

GARY R. HERBERT Governor

SPENCER J. COX Lieutenant Governor

# Department of Environmental Quality

Alan Matheson Executive Director

DIVISION OF WASTE MANAGEMENT AND RADIATION CONTROL Scott T. Anderson Director

August 22, 2016

Stirling Neeley, Branch General Manager Safety-Kleen Systems, Inc. 1066 South Pioneer Road Salt Lake City, UT 84104

RE: Draft Hazardous Waste Permit

UTD980957088

Dear Mr. Neeley:

The Division of Waste Management and Radiation Control has completed its review of the Safety-Kleen Systems, Inc. permit renewal application. A draft permit has been prepared for the Pioneer Road facility. A copy of the draft permit with the proposed changes highlighted is enclosed. Also enclosed is a copy of the draft permit fact sheet.

The public comment period for the draft permit began on August 11, 2016 and will end on September 26, 2016 with a public hearing scheduled for September 13, 2016. Further details about the public participation process and the changes made in the draft permit are outlined in the fact sheet.

If you have any questions, please call Boyd Swenson at (801) 536-0232.

Sincerely,

Scott T. Anderson, Director

Division of Waste Management and Radiation Control

STA/BAS/kl

Enclosures: Draft Permit, Fact Sheet

c: Gary Edwards, MS, Health Officer, Salt Lake County Health Dept.

Royal DeLegge, MPA, EHS, Environmental Health Director, Salt Lake County Health Dept.

David Duster, U.S.EPA, Region VIII, ENF-R

Nick Culian, Safety-Kleen

DSHW-2016-012101

#### **ATTACHMENT 1**

#### WASTE ANALYSIS PLAN

#### 1.A. WASTE TYPES

1.A.I. The following types of hazardous waste have been identified as candidates for storage at the Facility.

# 1.A.I.a. Spent Petroleum and Aqueous Parts Washer Solvent

1.A.I.a.i. Chemically, the petroleum solvent primarily consists of petroleum hydrocarbon fractions with boiling points between 310°F and 400°F. The flash point of the petroleum solvents ranges from 105°F (ignitable) to 212°F. Impurities, such as light aromatic hydrocarbons and chlorinated hydrocarbons, usually constitute less than one percent of the total volume. The aqueous parts washer solvent is primarily an aqueous solution with a small amount of organic additives (alcohols).

Spent parts washer solvent consists primarily of parts washer solvent, solids, oil, and grease picked up in the various degreasing operations. Water content may range from 0 percent to as much as 50 percent. The oily bottoms may range from 2 percent to 10 percent by volume in the used solvent. The substances that comprise the used parts washer solvent are compatible and are suitable for bulking. The spent parts washer solvent is transported in accordance with the generator's hazardous waste determination pursuant to R315 5R315-262. Hazardous characteristics of the spent parts washer solvents can vary and are primarily associated with constituents introduced by the customer's processes. Chemically, the composition of the solvent fraction in the spent parts washer solvent is essentially the same as the clean solvent.

1.A.I.a.ii. Containers of spent petroleum based parts washer solvent that are returned from customers are poured into a drum washer/dumpster at the return/fill station, which is piped into the aboveground waste solvent storage tank located in the tank farm. As generated, spent petroleum based parts washer solvent may exhibit the characteristic of ignitability. Spent petroleum based parts washer solvents may also be considered characteristic waste by the toxicity characteristic leaching procedure (TCLP) and may carry the waste codes identified in Table 1-ATTACHMENT 1.

The spent aqueous parts washer solvent is transported from customers in containers and may be accumulated in the aboveground waste solvent storage tank via the return/fill station. The spent aqueous parts washer solvent may be considered characteristic waste by TCLP and may carry the waste codes referred to in Table 1-ATTACHMENT 1.

#### 1.A.I.b. **Spent Immersion Cleaner**

1.A.I.b.i.

Safety-Kleen leases units containing "immersion cleaner." This product is a petroleum-based solvent. Parts are immersed and agitated in equipment designed to minimize physical labor time. Spent immersion cleaner received by the facility from customers, is basically unchanged from its clean state, except oil, grease, and other solids may be picked up during the various degreasing operations. The spent solvent is nonflammable. It is regarded as hazardous because of the presence of various contaminants. The used immersion cleaner remains in the same container from the time it is collected from the customer until it is shipped to a Safety-Kleen recycle facility or other permitted facility to manage this waste stream. The used immersion cleaner may exhibit toxic characteristics by TCLP and may carry the waste codes referred to in Table 1-ATTACHMENT 1.

#### 1.A.I.c. Spent Parts Washer Solvent Tank Sludge

1.A.I.c.i.

Tank bottom sludge settles from spent parts washer solvent in the aboveground storage tank. The sludge is the residual left in the tank and may contain soils, oil and grease, and water picked up in degreasing operations, together with solvent. Analyses have shown that the sludge is an ignitable waste and may also be considered hazardous with respect to TCLP standards. The sludge is removed from the aboveground tank periodically and shipped to a Safety-Kleen facility or other permitted facility for reclamation.

#### 1.A.I.d. Spent Washer Solvent Bottom Sludge

1.A.I.d.i.

Parts Washer Solvent Bottoms Sludge is either accumulated in the wet dumpster/drum washer or brought into the service center in drums from customers in drums. Filters from parts washers utilizing parts washer solvents may also be added. The nature of this waste is similar to the used parts washer solvent tank bottom sludge, except there may be some metal parts from the cleaning operation. It is typically an ignitable waste and often is a characteristic waste using TCLP standards. The parts washer solvent bottoms sludge in the dumpsters is cleaned out frequently. The waste is containerized and stored as a Branch-generated waste in a permitted waste storage area for later shipment to a Safety-Kleen recycle facility or other permitted facility for reclamation or disposal.

#### 1.A.I.e. **Dry Cleaning Wastes**

1.A.I.e.i.

Solvents used in dry cleaning operations include tetrachloroethylene (perchloroethylene), mineral spirits, 1,1,1-trichloroethane and 1,1,2-Trichloro-1,2,2-trifluoroethanehalogenated and mineral spirits based solvents. Waste generated from dry cleaning operations may contain various concentrations of these solvents and are in the following forms:

1.A.I.e.i(A).

Filter Cartridges: In addition to the filter materials of construction consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease, and undissolved elements such as lint and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight.

- 1.A.I.e.i(B). Powder Residue: At some dry cleaning facilities, a mixture of powdered materials is used as the filter medium for the dry cleaning solvent, in lieu of a cartridge filter. This filter medium normally consists of diatomaceous earth and carbon. In addition to lint, soil, oil, and grease retained by this medium, between 40 and 50 percent by weight of the "powder residue" may be absorbed solvent.
- 1.A.I.e.i(C). Still Residue and Separator Water: After filtration at the generator, the dry cleaning solvent is distilled to remove the dissolved materials from the used solvent. The dissolved materials (still residues) are in liquid form and consist primarily of detergent, oil and grease, vinyl acetate (a sizing compound), water and 20 to 30 percent solvent. In some cases, the dry cleaner will separate the water condensate from the still residue. Water condensate removed from the processor may contain dry cleaning solvent, oil, grease and vinyl acetate.
- 1.A.I.e.ii. Approximately 80 percent of the A common dry cleaning solvent <u>currently</u> in use is perchloroethylene (F002 and a characteristic waste by TCLP), and <u>it</u> may carry the waste codes referred to in Table 1-ATTACHMENT 1. Approximately 17 percent of the Other dry cleaning solvents is in use may include mineral spirits, and the remaining 3 percent is 1,1,1-trichloroethane or 1,1,2-Trichloro-1,2,2-trifluoroethane. The mineral spirits, 1,1,1-trichloroethane and 1,1,2-Trichloro-1,2,2-trifluoroethane are non-perchloroethylene based dry-Dry cleaning wastes and are typically managed as transfer wastes.

# 1.A.I.f. Paint Wastes

- 1.A.I.f.i. Paint wastes consist of paints, lacquer thinners, and paint/thinner contaminated materials. The waste is collected in containers at the customer's place of business and stored in Safety-Kleen's permitted metal shelter container storage area or managed as a transfer waste. The paint wastes that are not managed as transfer wastes, are then re-manifested and periodically sent to a Safety-Kleen recycle center or other permitted facility.
- 1.A.I.f.ii. Paint wastes include such constituents as acetone, isopropyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, toluene, xylenes, and acetate compounds. This waste stream may also be a characteristic waste by TCLP, and may carry the waste codes referred to in Table 1-ATTACHMENT 1.

# 1.A.I.g. **Imaging/Photochemical Waste**

1.A.I.g.i. Imaging waste consists typically of an aqueous solution used to etch photo film during processing. This material is characteristic by TCLP for silver (D011) and may be managed as a transfer waste.

# 1.B. WASTE ANALYSIS PLAN

1.B.I. Safety-Kleen provides solvent distribution, collection, and reclamation services to companies that are primarily engaged in automobile repair, industrial maintenance, dry cleaning, and imaging. When the cleaning fluids become dirty

and can no longer be used effectively, Safety-Kleen picks up the dirty fluids and
replaces them with clean, recycled fluids. The spent fluids are returned to the
facility where they are stored temporarily before they are transported to one of
Safety-Kleen's recycle centers or other appropriate permitted off-site facilities.
In addition to solvents used in the industrial maintenance and repair industry,
Safety-Kleen also collects dry cleaning, paint-related, and photochemical/imaging
wastes that may managed as transfer wastesfor temporary storage at the facility.
Safety-Kleen's customers typically are small quantity generators who operate
businesses that generate only a few hazardous waste streams. These factors help
ensure that Safety-Kleen will receive a highly predictable and homogeneous
waste stream.

- 1.B.II. Spent solvents are the primary feedstocks for the generation of some of the Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. Safety-Kleen controls the use and management of its solvents by:
- 1.B.II.a. Placing waste only in containers compatible with those wastes and segregating containers according to DOT and fire code requirements;
- 1.B.II.b. Determining the customer's type of business (i.e., SIC code) and the purpose for which the machine will be used;
- 1.B.II.c. Providing customers with information on how to use leased Safety-Kleen equipment, where applicable;
- 1.B.II.d. Training employees to inspect wastes and determine whether they are acceptable for storage at the branch;
- 1.B.II.e. Indicating on the service document, every time waste is collected, that the solvent has been evaluated and meets Safety-Kleen's acceptance criteria;
- 1.B.II.f. Marking each container with the customer's name, address, and EPA I.D. number (if required). This information remains on containerized waste until it is accepted at the Branch;
- 1.B.II.g. Keeping a record of each incoming and outgoing shipment in the operating log at the facility;
- 1.B.II.h. Demonstrating the chemical and physical homogeneity of the wastes by sampling and analyzing a representative portion of generator waste streams on an ongoing annual basis at the national level; and
- 1.B.II.i. Performing routine analysis of the wastes received at the reclamation or disposal facility.

- 1.B.III. The materials collected by the facility are often collected from a company with a single waste generation process. The composition and quality of these materials are known and Safety-Kleen's operating experience has shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect certain materials before returning them to the facility. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.
- 1.B.IV. Safety-Kleen shall not accept any suspected nonconforming material until a full analysis has been-doneperformed, otherwise the material shall be rejected. Procedures to verify waste characteristics shall occur at several checkpoints in the management of the waste.
- 1.B.V. Safety-Kleen shall require each customer to sign a service document containing the following information:
- 1.B.V.a. The name, address, and EPA I.D. number of the facility to which the waste is being shipped;
- 1.B.V.b. The customer's name, address, and EPA I.D. number (if required); and
- 1.B.V.c. The description and amount of waste generated.
- 1.B.VI. Each incoming and outgoing shipment shall be recorded in the facility's operating log. In addition, each sales representative shall review the acceptance criteria each time a waste is picked up. In accordance with Safety-Kleen procedure, all generators shall sign a statement with each shipment that indicating that no material has been added to the closed-loop products supplied by Safety-Kleen. Finally, selected environmental reviews may be utilized to guard against the addition of other wastes into the generator's waste.

#### 1.C. QUALITATIVE WASTE ANALYSES

- 1.C.I. Prior to acceptance, a Safety-Kleen representative shall visually inspect each container of waste at the customer's location. This inspection shall include an evaluation of the waste volume, appearance, and consistency. Safety-Kleen personnel are familiar with the characteristics of all wastes managed at the Branch. Safety-Kleen has established specific acceptance criteria for wastes managed at their facilities based on known characteristics. These criteria, described in Condition 1.D. below, shall be used by Safety-Kleen personnel to aid in their visual inspections. These acceptance criteria enable Safety-Kleen to help ensure that the wastes being collected are acceptable and do not contain unacceptable contaminants.
- 1.C.II. If a particular container of waste does not meet the established acceptance criteria, the Safety-Kleen service representative shall reject the container at the customer's place of business. At the customer's request, a sample may be collected and analyzed by Safety-Kleen to determine whether the Branch can manage it.

Depending on the source, the waste shall be analyzed for parameters related to the suspected source/type of waste as identified in Table 2-ATTACHMENT 1. Alternately, the customer may choose to dispose of the material by using another permitted (non-Safety-Kleen) facility.

1.C.III.

If a waste is to be sampled for further analysis, the service representative shall take a <u>representative</u> sample of the waste and then seal the original container and label it as hazardous waste. The original container shall be left with the customer pending the results of the laboratory tests. The laboratory testing shall involve analyzing the suspect waste for compounds/characteristics related to the suspected source of the contamination (e.g., volatile organics, halogenated organics, PCBs, etc.).

1.C.IV.

If the laboratory analysis reveals that the sampled waste is not contaminated and is otherwise acceptable for management at the facility, Safety-Kleen will accept the waste from the customer. If the laboratory confirms that the waste is contaminated, the customer will be given a choice as to whether they will dispose of the waste themselves or will require Safety-Kleen's assistance.

# 1.D. <u>WASTE-SPECIFIC CRITERIA</u>

#### 1.D.I. Spent Parts Washer Solvent

1.D.I.a.

Volume and color are the primary criteria for determining, by visual inspection, whether spent parts washer solvent has been contaminated. Safety-Kleen places clean parts washer solvent in various sized containers, each having a known volume based upon the service provided to the customer. When the waste is picked up, the container should not hold more than the volume originally delivered. If the volume of waste in a given container exceeds the specified level, the Safety-Kleen service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.I.b.

Spent parts washer solvent shall be visually inspected for color. Clean parts washer solvent has a known color, typically a green tint or clear. Unused aqueous parts cleaner is also clear. As the solvent is used, it changes color. The specific color change is dependent upon the type of equipment being cleaned. For example, solvent used at automotive shops typically changes to brown or black, while solvent used by silk screeners will change according to the color of the inks (red, blue, pink, green, etc.). Aqueous solvent used at transmission shops changes from a clear to a red color. If the spent solvent color does not appear to be consistent with cleaning process being used, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

#### 1.D.II. Immersion Cleaner

1.D.II.a.

The criteria for the inspection of spent immersion cleaner are volume and color. Clean immersion cleaner is delivered to the customer in containers, with each container holding a known volume of immersion cleaner, typically six gallons.

Spent immersion cleaner is picked up from the customer in the same containers. If no additional material has been added to the spent immersion cleaner, the containers should contain no more the original volume of immersion cleaner. If a container contains more than the original volume, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.II.b. Clean immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. If the spent immersion cleaner does not appear to be amber, brown, or black, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

# 1.D.III. Spent Dry Cleaning Filter Cartridges

1.D.III.a. Spent filter cartridges shall be placed in containers that hold one to three cartridges. Trained service representatives visually inspect and confirm that the items in the containers are spent dry cleaning filter cartridges. The containers may also contain approximately one to two inches of liquid that should be either clear or have a light brownish tint. If the amount of the liquid is greater than approximately two inches or if the liquid is a color other than clear to light brown, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

#### 1.D.IV. **Dry Cleaning Powder Residue**

- 1.D.IV.a. The criteria for the acceptance of dry cleaning powder residue are consistency and color. A container of powder residue should not contain more than one inch of liquid. The waste should be slightly wet, with the consistency of a paste. If there is too much liquid in the container, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.
- 1.D.IV.b. The powder residue shall be inspected for a white to grayish-black color. If the residue is not white to grayish-black in color, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

#### 1.D.V. **Dry Cleaning Still Residues**

- 1.D.V.a. The criteria for the acceptance of dry cleaning still residues are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is non-viscous/too thin, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.
- 1.D.V.b. In addition to the consistency, the still residue waste shall be inspected for a dark brown or black color. If the waste is not dark brown or black, the service

representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

#### 1.D.VI. Gun Cleaner Paint Waste

1.D.VI.a.

The significant criterion for determining whether gun cleaner paint waste is accepted is volume. The solvent is provided to customers in two containers with a set volume based upon the service type. The paint gun-cleaning machine operates as a closed system consisting of container of fresh lacquer thinner and a container for spent lacquer thinner. The closed system is designed such so that there should never be a combined volume of more than the set volume of lacquer thinner in the two containers. At the time of customer waste pickup, if there is more waste in the two containers than the original volume of lacquer thinner provided to the customer, the service representative shall reject the waste in accordance with Condition 1.C.II of this attachment.

#### 1.D.VII. Paint Waste

1.D.VII.a.

The criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative shall insert a three-foot-long glass tube into the container. The tube should glide easily down to the bottom of the container. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative shall reject the waste. The contents of the glass tube shall also be visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the three-foot tube (the water and paint will separate in the tube and thus can be measured), the waste shall be rejected in accordance with Condition 1.C.II of this attachment.

#### 1.D.VIII. **Imaging Waste**

1.D.VIII.a.

When a customer is initially signed up for Safety-Kleen's imaging service, their waste is analyzed for silver content using a Colorimeter or other device to measure silver content. A visual examination is made of the photo solution each time the waste is picked up. The imaging waste typically has a light to dark amber color and an aqueous consistency. At the time of pickup, if the <u>sSafety-Kleen</u> representative observes that the waste is not a light to dark amber in color and aqueous in consistency, the waste shall be rejected in accordance with Condition 1.C.II of this attachment.

#### 1.E. WASTE ANALYSES AT THE RECYCLE FACILITY

1.E.I.

Wastes shipped from the <u>facility branch</u> to a Safety-Kleen recycle facility are sampled and analyzed upon receipt in accordance with the waste analysis plan for the recycle facility. Analyses performed at the Safety-Kleen recycle facilities are undertaken to safeguard the recycling process and to assure product quality. Samples of bulk loads and composites of drum loads are analyzed for waste

specific parameters including flash point, TCLP (except herbicides and pesticides), and volatile organics. Results of analyses performed at the Safety-Kleen recycle center or other laboratory of waste shipments from the facility shall be obtained by Permittee within 30 days of receipt of the waste at the recycle center and shall be maintained in the facility operating record.

#### 1.F. WASTE PROFILING

- 1.F.I. The Permittee shall establish a profile for each waste stream prior to initial acceptance of the waste stream from a generator. The waste profile includes the information necessary to properly manage the waste stream and establishes a baseline of information for use in determining acceptability of subsequent shipments of the waste stream.
- 1.F.II. The Permittee shall use analytical testing, generator waste characterization information, and process knowledge to establish each waste profile. At a minimum, the Permittee shall conduct the analyses or obtain analytical results for the tests identified in Table 2-ATTACHMENT 1 to establish each waste profile. The information used to establish each waste profile shall be maintained in the facility operating record.
- 1.F.III. At the time of waste pickup, each generator shall certify in writing that the waste being collected matches the established profile.

# 1.G. REQUIRED RECORDS AND REPORTING

- 1.G.I. Waste Manifests
- 1.G.I.a. Appropriate shipping papers/manifests are used, based on the monthly quantity of hazardous waste generated by the customer. Safety-Kleen services all three categories of generators in Utah — conditionally exempt small quantity generators (CESQGs), small quantity generators (SQGs), and large quantity generators (LQGs). CESQGs' spent solvent is removed via a service document and no manifest or Land Disposal Restrictions (LDR) form/notification is required. Appropriate records are kept at the Branch as to the date of waste pickup, quantity, and other data on the service document. SQGs' spent solvent may be shipped under a tolling agreement, i.e., a contractual agreement between the SQG and a recycler where the recycler reclaims the waste and returns regenerated product to the SQG, in which case a manifest is not required provided the requirements of R315-5-2.20(e) R315-262-20(e) are met. An LDR form/notification shall be completed per the requirements of R315-13-1-R315-268 for each SQG. LQGs' spent solvent shall be manifested (if hazardous) and an LDR form/notification completed per the requirements of R315-13-1R315-268.
- 1.G.I.b. Spent solvent (from each Safety-Kleen customer, regardless of generator status) shall be brought back to the Branch and dumped in the return/fill station and pumped to the waste solvent tank. The waste solvent tank contains the spent solvent of many customers and is hazardous waste. The contents are regularly

sent via truck tanker to a Safety-Kleen recycle center or other permitted facility. These loads shall be manifested. An LDR form/notification shall be completed per the requirements of R315-13-1R315-268.

1.G.I.c. Shipments of parts washer solvent bottoms sludge shall also be manifested as indicated above. Required records shall be kept at the Branch and the recycle center for five years.

# 1.H. <u>LAND DISPOSAL RESTRICTION REQUIREMENTS</u>

1.H.I. Safety-Kleen Pioneer Road shall comply with the applicable land disposal restriction requirements in R315-13R315-268. Incoming loads lacking the proper LDR notification shall not be accepted. Outbound shipments shall include the proper LDR notification.

#### TABLE 1-ATTACHMENT 1

# PERMITTED WASTES SAFETY-KLEEN SYSTEMS, INC. SALT LAKE CITY, UTAH

Waste Type	Process Code(s)	Estimated Annual Amounts (thousands of gallons)	Potential Waste Codes
Spent Parts Washer Solvent <sup>1,2</sup>	S01 S02	336 336	D001 and D-Codes Listed in Note Below
Spent Aqueous Parts Washer Solvent <sup>1,2</sup>	S01 S02	Included Above	D-Codes Listed in Note Below
Spent Parts Washer Bottom Sludge <sup>1</sup>	S01	Included Above	D001 and D-Codes Listed in Note Below
Spent Parts Washer Bottom Sludge from Tank <sup>2</sup>	S02	Included Above	D001 and D-Codes Listed in Note Below
Spent Immersion Cleaner <sup>1</sup>	S01	14	D-Codes Listed in Note Below
Dry Cleaning Waste <sup>1</sup>	S01	97	D001, F002 and D-Codes Listed in Note Below
Paint Waste <sup>1</sup>	S01	19	D001, F003, F005 and D-Codes Listed in Note Below
Imaging/Photochemical Waste <sup>1</sup>	S01	20	D011

#### **NOTES:**

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

<sup>&</sup>lt;sup>1</sup> This waste may be stored in containers at the facility.

 $<sup>^{2}\,\,</sup>$  This waste may be stored in the hazardous waste storage tank at the facility.

#### **TABLE 2-ATTACHMENT 1**

# Waste Specific Analytical Requirements Safety-Kleen Systems, Inc. Salt Lake City Service Center<sup>1</sup>

Waste Stream	<u>Tests</u>	Methods (SW-846) <sup>2</sup>
<ol> <li>Spent Parts Washer Solvent Sample collected from tank or container<sup>3</sup></li> </ol>	Flash Point TCLP (organics and inorganics <sup>4</sup> ) Appearance and Specific Gravity <sup>5</sup>	1010 1311
2. Spent Parts Washer Tank Bottom Sample collected from tank	Flash Point TCLP (organics and inorganics) Appearance	1010 1311
3. Spent Parts Washer Dumpster Sludge Random Grab Sample	Flash Point TCLP (organics and inorganics) Appearance	1010 1311
4. Spent Immersion Cleaner Random Grab Sample	Flash Point TCLP (organics and inorganics) Appearance and Specific Gravity	1010 1311
5. Dry Cleaning (Filter Cartridges, Powder Residue, and Still Bottoms)	Flash Point TCLP (organics and inorganics) Appearance Volatile Organics (F-Wastes)	1010 1311 8260
6. Paint Waste Random Grab Sample	Flash Point TCLP (organics and inorganics) Appearance Volatile Organics (F-Wastes)	1010 1311 8260
7. Paint Spray Gun Cleaner Random Grab Sample	Flash Point TCLP (organics and inorganics) Appearance Volatile Organics (F-Wastes)	1010 1311 8260
8. Imaging/Photochemicals Random Grab Sample	TCLP (organics and inorganics) Appearance	1311

#### Notes:

- 1 All certifiable tests conducted by Utah Certified Laboratory
- 2 Method Detection Limits must comply with SW-846 standards
- 3 Sampling criteria applicable to Service Center quantitative analysis
- 4 TCLP organics = volatile and semi-volatile constituents
- 5 Appearance and Specific Gravity may also be performed by qualified Safety-Kleen Service Center representatives

#### **ATTACHMENT 2**

#### **CONTINGENCY PLAN**

# 2.A. <u>PURPOSE</u>

- 2.A.I. The Contingency Plan describes the actions to be taken by each employee in the event of a spill, fire or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or ground water.
- 2.A.II. The Contingency Plan shall be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or materials that could threaten human health or the environment.

# 2.B. <u>EMERGENCY COORDINATOR RESPONSIBILITIES</u>

- 2.B.I. The Emergency Coordinator or alternate is responsible for implementing the Contingency Plan during an emergency; however, all employees shall be familiar with the procedures in this plan so that they know what to do during an emergency situation. Employees will be trained on the Contingency Plan as described in the ATTACHMENT 4 of this Permit.
- 2.B.II. The Emergency Coordinator and alternates are familiar with all aspects of this Contingency Plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. The Emergency Coordinator and alternates have the authority to commit the resources necessary to carry out the Contingency Plan.
- 2.B.III. Table 1-ATTACHMENT 2 contains the names and information of those persons qualified to act as Emergency Coordinators. This list will be updated, as necessary. At all times, at least one of the employees designated as the Emergency Coordinator will be at the facility or on call to respond to an emergency situation at the facility.

# 2.C. <u>RESPONSIBILITIES DURING AN EMERGENCY</u>

- 2.C.I. The person who discovers the emergency situation shall report the situation to the Emergency Coordinator.
- 2.C.II. Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or alternate when the Emergency Coordinator is not available) shall immediately:

- 2.C.II.a. Activate the internal facility communication system to notify all facility personnel;
- 2.C.II.b. Notify Safety-Kleen's Incident Notification System using the 24-hour telephone number 1-800-468-1760; and
- 2.C.II.c. Notify appropriate state or local agencies with designated response roles, if necessary.
- 2.C.III. Whenever there is a release, fire, or explosion, the Emergency Coordinator shall immediately try to identify the character, exact source, amount, and extent of any contamination. This can be accomplished by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.
- 2.C.IV. During an emergency, the Emergency Coordinator shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion such as toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off.
- 2.C.V. During an emergency, the Emergency Coordinator shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

# 2.D. REMEDIAL ACTION RESPONSIBILITIES

- 2.D.I. If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the Emergency Coordinator shall contact the Safety-Kleen Incident Notification System to report the incident. Treatment, storage and/or disposal of recovered waste, contaminated soil, or contaminated surface water from a spill or fire will be arranged by Safety-Kleen and carried out as expeditiously as possible.
- 2.D.II. The Emergency Coordinator shall ensure that, in the affected area(s) of the facility:
- 2.D.II.a. No substances that may be incompatible with the released material are brought on site until cleanup procedures are completed; and
- 2.D.II.b. All emergency equipment listed in the Contingency Plan is cleaned and deemed fit for its intended use or replaced before operations are resumed.

2.E.	REPORTING RESPONSIBILITIES
2.E.I.	The Emergency Coordinator shall determine whether the facility has had a release that could threaten human health or the environment outside the facility.
2.E.II.	If the Emergency Coordinator's assessment indicates that evacuation of local areas may be advisable, the Emergency Coordinator shall immediately notify appropriate authorities, the Safety-Kleen Incident Notification System and the Director and provide the following information:
2.E.II.a.	Name and telephone number of notifier;
2.E.II.b.	Name and address of facility;
2.E.II.c.	Time and type of incident (e.g., release, fire);
2.E.II.d.	Name and quantity of material(s) involved, to the extent known;
2.E.II.e.	The extent of injuries, if any; and
2.E.II.f.	The possible hazards to human health, or the environment outside the facility.
2.E.III.	Safety-Kleen shall notify the appropriate state and local authorities that the facility is in compliance with R315-8-4.7(h) R315-264-56(h) before operations are resumed in the affected area(s) of the facility.
2.E.IV.	The Emergency Coordinator shall record in the facility operating record the time, date, and details of any incident that requires the implementation of the Contingency Plan. Within 15 days of the incident, Safety-Kleen shall submit a written report on the incident to the Director. The report shall include:
2.E.IV.a.	Name, address, and telephone number of the owner or operator;
2.E.IV.b.	Name, address, and telephone number of the facility;
2.E.IV.c.	Date, time, and type of incident (e.g., fire, explosion);
2.E.IV.d.	Name and quantity of material(s) involved;
2.E.IV.e.	The extent of injuries, if any;
2.E.IV.f.	An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
2.E.IV.g.	Estimated quantity and disposition of recovered material that resulted from the incident.

2.E.V. During an emergency, the following government agencies and local authorities may be contacted as appropriate:

Agency/Authority	Rationale
Police Department	Notify if there is imminent danger to
	human health
Fire Department	Notify if there is a fire, uncontrolled
	spill, or other imminent danger
Hospital	Notify if there are injuries
Director	Report releases and fires
Qualified Emergency Response	Call to assist with remedial action after
Contractor	a release

2.E.VI.

Arrangements have been made to familiarize the police department, fire department, and local emergency response teams with the layout of the facility, the properties and hazards of materials handled at the facility, the locations where facility personnel normally work, entrances to the facility, and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. Copies of the letters to the local police department, fire department, and hospital are on file at the facility and records of updates shall be kept in the facility operating record. Material Safety Data Sheets (MSDSs) for products commonly stored on site shall be made available to all employees at the facility and shall be distributed to those entities with which arrangements have been made.

# 2.F. <u>SPECIFIC EMERGENCY RESPONSE PROCEDURES</u>

2.F.I. Response actions to be taken in specific emergency situations are described in the sections that follow. Spilled waste shall be identified by observation (location and type of container) and the markings on container labels.

#### 2.F.I.a. MINOR SPILLS

2.F.I.a.i. If a spill should occur while pouring waste solvent into a dumpster or while filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, the spill shall be collected with absorbent material. Should the spill occur outside the containment, remedial actions depend on whether the spill occurs on a paved or unpaved area:

2.F.I.a.i(A). If a solvent spills on a paved area, it shall be collected with absorbent sheets or absorbent material. The absorbents shall be collected, drummed and shipped to a processing/disposal facility for proper disposal.

2.F.I.a.i(B).

If a solvent spills on an unpaved area, any free liquid shall be collected with absorbent material. The absorbent material and any contaminated soil shall be collected, drummed and shipped to a processing <u>for</u> disposal facility for proper disposal.

2.F.I.a.ii.

If a spill occurs while handling containers outside of the warehouse, the applicable response actions described in Conditions 2.F.I.a.i(A). and 2.F.I.a.i(B). above shall be followed. Spills inside the warehouse and the container storage areas are kept from contaminating the environment by concrete or steel floors and the secondary containment. In the event of a spill indoors, the doors and windows shall be opened to improve the ventilation in the confined area. If ignitable material is spilled in a non-explosion rated area or is flowing into such, workers in the area shall ensure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. Then, following the instructions from the appropriate Material Safety Data Sheet, workers shall enter the area wearing appropriate personnel protection such as rubber gloves, aprons, safety glasses, and a respirator, collect the liquid, containerize it and return it to storage.

2.F.I.a.iii.

All sumps are emptied and cleaned using either absorbents and a wet/dry vacuum cleaner, or both. Liquid in the sumps shall be removed upon detection. The sumps are closed and no piping is associated with them. All material collected from spill cleanups shall be treated as hazardous waste.

2.F.I.a.iv.

Clean-ups are considered complete only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills shall be reported to the Safety-Kleen Incident Notification System and if necessary, to the Director as required under R315-9R315-263-30 through 33.

2.F.I.b.

MAJOR SPILLS

2.F.I.b.i.

Any spill that cannot be completely remediated using the methods described in Condition 2.F.I.a., is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material that escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems, and storm sewer systems. Emergency response to this type of spill shall include the following as applicable:

- 2.F.I.b.i(A).
- Assist any injured people;
- 2.F.I.b.i(B).
- Stop the flow of waste/solvent, if possible;
- 2.F.I.b.i(C).
- Retain, contain or slow the flow of the released material, if possible;

- 2.F.I.b.i(D). If the released material escapes containment efforts, immediately call the local Fire Department, and report to the Emergency Coordinator and the Incident Notification System; and
- 2.F.I.b.i(E). Immediately recover the spilled material to reduce property and environmental damage. Start recovery operations immediately.
- 2.F.I.b.ii. If there is an imminent or actual emergency situation, the Emergency Coordinator shall immediately contact emergency response authorities. The Emergency Coordinator shall report any incident as soon as possible to the Safety-Kleen Incident Notification System using the 24-hour telephone number, and request further assistance if necessary. The Emergency Coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center and the Director. Otherwise, the Safety-Kleen Incident Notification System will contact the proper authorities. Emergency response agencies, qualified emergency response contractor(s), Safety-Kleen's Incident Notification System, and spill response agencies including the Director, have telephone numbers that are posted by at least one phone at the facility.
- 2.F.I.b.iii. The person reporting a spill shall be prepared to give his name, position, company name, address and telephone number. The person reporting shall also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed.
- 2.F.I.b.iv. All spill incidents shall be recorded by Safety-Kleen in the facility operating record. Incident reports shall at a minimum include the following information:
- 2.F.I.b.iv(A). The location of the spill;
- 2.F.I.b.iv(B). The name of the person reporting the spill;
- 2.F.I.b.iv(C). Date, time, and type of incident (e.g., fire, explosion);
- 2.F.I.b.iv(D). Name and quantity of material(s) involved;
- 2.F.I.b.iv(E). The extent of injuries, if any;
- 2.F.I.b.iv(F). An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- 2.F.I.b.iv(G). A record of agencies and departments notified.

#### 2.G. FIRE CONTROL PROCEDURES

- 2.G.I. If a fire occurs, trained personnel may attempt to extinguish the fire but only if they believe that they can do so without endangering themselves. Trained personnel shall assess the situation then act quickly with a fire extinguisher to put out the fire before it spreads. If it cannot be extinguished immediately, the facility shall be evacuated and the fire department shall be notified.
- 2.G.II. Vapors of the petroleum based solvents exposed to a spark or open flame can flash at temperatures over 105°F. Petroleum based solvent can generate carbon monoxide and other poisonous gases. If a fire affects the storage tanks or container storage areas, then:
- 2.G.II.a. Isolate the hazard area and deny entry to unauthorized personnel;
- 2.G.II.b. Stay upwind, keep out of low areas;
- 2.G.II.c. Ventilate closed areas before entering them;
- 2.G.II.d. Wear positive pressure breathing apparatus and protective clothing: and
- 2.G.II.e. Evacuate a 600-foot radius area endangered by the gas.
- 2.G.III. A petroleum\_-based solvent fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.
- 2.G.IV. Chlorinated solvents (immersion cleaner and dry cleaning wastes) are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (about 1200°F). The potential for the materials reaching a decomposition state is minimal; however, personnel and local authorities shall be made aware of the proper response, should a fire affect the drum storage areas including:
- 2.G.IV.a. Isolate the hazard area and deny entry to unauthorized personnel;
- 2.G.IV.b. Stay upwind, keep out of low areas;
- 2.G.IV.c. Ventilate closed spaces before entering them;
- 2.G.IV.d. Wear positive pressure breathing apparatus and protective clothing; and
- 2.G.IV.e. Evacuate a 600-foot radius area endangered by the gas, or larger area if necessary, based on an assessment of the potential hazard.

- 2.G.V. A fire in the drum storage area can best be extinguished by foam, water fog, or water spray.
- 2.G.VI. Paint wastes can generate carbon monoxide and other poisonous gases.

  Therefore, it is important to wear positive pressure breathing apparatus and full protective clothing in the affected area. If a fire in or near the metal shelter container storage area occurs:
- 2.G.VI.a. Isolate the hazard area and deny entry to unauthorized personnel;
- 2.G.VI.b. Stay upwind; keep out of low areas; and
- 2.G.VI.c. Wear positive pressure breathing apparatus and protective clothing.

# 2.H. <u>FACILITY EVACUATION</u>

- 2.H.I. Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes as required by ATTACHMENT 4.
- 2.H.II. When an uncontrolled fire or release has occurred, or the Emergency Coordinator deems necessary, all personnel are to evacuate the facility according to the Evacuation Plan, Appendix A-ATTACHMENT 2 and assemble across Pioneer Road to assure that all personnel are accounted for and out of the hazardous area. An oral cry and the intercom will be used to alert employees to evacuate. Employees are trained for evacuation of the facility. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

# 2.I. <u>ARRANGEMENTS WITH EMERGENCY RESPONSE CONTRACTORS</u>

2.I.I. Safety-Kleen keeps at least one emergency response company on retainer to provide remedial services listed above. Emergency response contractor(s) will be selected based on their ability to respond to an incident at the facility, remediate an incident involving materials handled by the facility, and their ability to meet Safety-Kleen liability and performance standards. These contractors will be contacted to provide emergency assistance during a release and cleanup.

# 2.J. <u>EMERGENCY EQUIPMENT</u>

2.J.I. Safety-Kleen shall maintain the emergency equipment described in Table 1-ATTACHMENT 3.

#### 2.K. AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

2.K.I.	An updated copy of this plan shall be kept at the service center and it shall be updated as necessary throughout the operating life of the service center. Copies of this plan and all revisions shall be provided to local authorities and organizations that may be called upon to provide emergency services. In addition, this plan, and all revisions to the plan, shall be made readily available to employees working at the service center.
2.K.II.	The plan shall be reviewed and updated, if necessary, whenever:
2.K.II.a.	The service center permit is modified in accordance with Condition I.D. to allow new processes or wastes to be stored or treated, or applicable regulations are revised;
2.K.II.b.	The list or location of emergency equipment changes;
2.K.II.c.	The service center changes in its design, construction, operation, maintenance, or other circumstances in a way that:
2.K.II.c.i.	Increases the potential for fires, explosions, or releases of hazardous constituents; or
2.K.II.c.ii.	Changes the response necessary in an emergency.
2.K.II.d.	The names, addresses, or phone numbers of Emergency Coordinators change;
2.K.II.e.	Employees assigned to emergency response tasks change; or
2.K.II.f.	The plan fails when implemented in an emergency.
2.K.III.	The Director shall be notified within seven days, in accordance with Condition

I.D., of any change in Emergency Coordinator.

# CONTINGENCY PLAN - ATTACHMENT 2 TABLE 1

#### **EMERGENCY INFORMATION**

Safety-Kleen Systems, Inc. 1066 South Pioneer Road Salt Lake City, UT 84104 Office: (801) 975-0742

# A. Emergency Coordinators

Name:	Home Address:	Telephone:		
Facility Emergency Coordinator				
Stirling Neeley	8 West 1375 North	Home: (972) 658-9326		
	Layton, UT 84041	Office: (801) 975-0742		
Alternate Emergency Coordinator				
Chris Hewitt	6150 W. Miners Mesa Drive	Home: (801) 330-3386		
	West Jordan, UT 84081	Office: (801) 975-0742		
Robert Wayman	4551 South Driftwood Drive	Home: (801) 560-9287		
	Taylorsville, UT 84123	Office: (801) 975-0742		

# B. Emergency Notification Entity Telephone Number

Lines	ency Numeration Entity	receptione rumber
Interna	<ul> <li>Safety-Kleen Incident Notification System</li> <li>24-Hour Emergency Number:</li> </ul>	(800) 468-1760
Externa	al –	
a.	National Response Center 24-Hour Emergency Number:	(800) 424-8802
b.	Utah Department of Environmental Quality - 24-Hour Environmental Response Emergency Line:	(801) 536-4123
c.	Utah Department of Environmental Quality - Business Hours:	(801) 536-0200
d.	General Emergency:	911
e.	Salt Lake City, UT Police Department:	(801) 799-3000
f.	Salt Lake City, UT Fire Department:	(801) 363-4401
g.	Pioneer Valley Hospital:	(801) 964-3100
h.	Emergency Response Contractor:	(800) 468-1760

# ATTACHMENT 2 – CONTINGENCY PLAN APPENDIX A EVACUATION PLAN

Insert - Site Plan Showing Evacuation Routes, Drawing Number 716601-QJPB003, Rev C

#### **ATTACHMENT 3**

#### PREPAREDNESS AND PREVENTION PLAN

# 3.A. <u>SECURITY MEASURES</u>

- 3.A.I. The Facility provides security with a variety of equipment. The Facility is secured with a six-foot high chain link fence topped by barbed wire. All access gates are locked when the Facility is unoccupied and warning signs stating "Danger Unauthorized Personnel Keep Out", are visible from twenty-five feet, and are posted at the entrances. Outdoor lighting is provided during low-light hours of the day. The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas.
- 3.A.II. The pumps for the tank system shall not be activated unless waste material is being added to the tank by the Facility. The pump controls for the waste tank are located inside the warehouse to prevent unauthorized material being placed in the tank and as a deterrent to vandalism during non-business hours.
- 3.A.III. The doors to the metal shelter container storage area shall be closed and locked unless containers are being added to or removed from the storage area. A warning sign shall be posted on the metal shelter container storage area.

# 3.B. FACILITY DESIGN

3.B.I. The Facility is designed and operated to minimize the possibility of spills or fires and to minimize the effects of any accidents that may occur. Specifications and descriptions for the container storage areas, tank, secondary containment and other equipment are included in ATTACHMENTS 7 and 8.

# 3.C. PLANT OPERATIONS

- 3.C.I. Employees shall perform their duties in the safest, most efficient manner possible and the service center shall be equipped to facilitate these activities. Drums shall be moved using a handcart and pallets using a forklift or pallet jack. Upon arrival at the service center, containers of waste shall be added to the storage tank or placed in a container storage area. Open drums of solvent shall not be left unattended. Occasionally, waste may be left on a truck overnight. If this occurs, the Facility representative, prior to leaving the service center, shall note it on the Facility inspection record. The waste shall be removed from the truck before the end of the next business day.
- 3.C.II. Potential Minor Spill Sources
- 3.C.II.a. The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

- 3.C.II.a.i. Pouring of drummed solvent into the wet dumpster/drumwasher -- As the drums are poured into the dumpster, solvent may splash out. Employee training emphasizes the importance of using care in emptying the drums. The return and fill station is underlain by a concrete slab and curb. This design should contain this type of spill.
- 3.C.II.a.ii. Filling of drums with solvent product -- A low-pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with solvent. Leaking fittings, a damaged hose or human error could lead to the discharge of solvent outside of the drum. Emergency shut-off valves are available, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.
- 3.C.II.a.iii. Moving of containers -- When a container is moved, a potential exists for it to tip over due to human error. To minimize the potential for spillage of solvent, all containers are maintained in an upright position and remain tightly covered while in storage or in transit.
- 3.C.II.a.iv. Delivery truck transfers -- Cargo shall be secured in the route vehicle with straps before transport. Individual containers can tip over or be dropped when being moved on or off a delivery truck, so transfers shall be made using a handcart and a hoist, if necessary. If a spill does occur, the amount of solvent in the containers is a quantity that can be collected with absorbent material. Any contaminated soil that results from a spill shall be removed manually, drummed and shipped to a disposal facility for proper disposal.
- 3.C.III. Potential Major Spill Sources
- 3.C.III.a. The following activities have the potential for a major (one for which remedial action shall require assistance) pollution incident:
- 3.C.III.a.i. Overfilling of storage tanks -- The storage tanks can be overfilled with a resulting discharge of solvent. A high level alarm and checks of tank volumes each business day should prevent this type of incident.
- 3.C.III.a.ii. Leaking pipelines -- The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and of the solvent inventory should detect any leaks.
- 3.C.IV. Potential Fire Sources
- 3.C.IV.a. The following is a list of fire prevention and minimization measures:
- 3.C.IV.a.i. All wastes and clean solvents shall be kept away from ignition sources -Personnel shall confine smoking and open flames to remote areas, separate from
  any solvent (e.g., the office or locker room). The solvent handling area, metal
  shelter container storage area and the aboveground storage tanks are separated

from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

3.C.IV.a.ii. Ignitable wastes shall be handled so that they do not:

3.C.IV.a.ii(A). Become subject to extreme heat or pressure, fire or explosion, or a violent reaction -- Solvent waste and paint wastes shall be stored in a tank or in drums, none of which shall be near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are protected with a pressure relief device and the drums stored in the warehouse shall be kept at room temperature to minimize the potential for pressure build up. Spark-proof clean up equipment shall be utilized to prevent a fire and/or explosion.

3.C.IV.a.ii(B). Produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health -- The vapor pressure of Safety-Kleen's petroleum-based solvent is low (2 mm Hg) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases should not form in quantities sufficient to threaten human health since strong oxidizers shall be kept segregated in accordance with Uniform Fire Code guidelines in the permitted storage areas at the Facility.

3.C.IV.a.ii(C). produce uncontrolled flammable fumes or gases in quantities sufficient to pose a risk of fire or explosion.

3.C.IV.a.ii(D). damage the structural integrity of the device or Facility.

3.C.IV.a.iii. A minimum of two feet for aisle space shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the Facility operation in an emergency.

3.C.IV.a.iv. "No Smoking" signs shall be posted in areas where solvents are handled or stored.

3.C.IV.a.v. Fire extinguishers and the fire suppression system shall be checked once per week and tested by a fire extinguisher maintenance company once per year.

#### 3.D. EXTERNAL FACTORS

3.D.I. The design of the installation is such that a harmful spill caused by external factors is unlikely to occur. The storage tanks are inaccessible to non-Facility personnel and the pump switches are located inside of the building. Also, the container storage areas are in buildings that are inaccessible to unauthorized personnel.

3.D.I.a. Vandalism -- Only extreme vandalism would have the possibility to result in a solvent spill or fire. Responses to spills and fires are described in the Contingency Plan.

3.D.I.b. Power failure -- A power failure is not likely to result in a spill or fire.

- 3.D.I.c. Flooding -- The site elevation is above the projected 100-year flood plain, therefore a 100-year flood is not likely to affect the service center.
- 3.D.I.d. Storms or Cold Weather -- The solvent return and fill station is roofed to eliminate the possibility of rain or snow from entering the dumpsters. No opportunity is foreseen to affect the service center with snow, cold weather or storm water.

# 3.E. <u>EQUIPMENT</u>

- 3.E.I. Internal Communications
- 3.E.I.a. Because the Facility is small, internal communications within the facility are by voice, intercom or telephone. Telephones are located in the office, return and fill station, and at the safety station near the metal shelter for paint waste storage.
- 3.E.II. External Communications
- 3.E.II.a. Telephones will be used to report a spill or a fire and to summon assistance from local and state emergency response agencies.
- 3.E.III. Emergency Equipment
- 3.E.III.a. The minimum required emergency equipment for a Safety-Kleen Service Center is identified in Table 1-ATTACHMENT 3. The locations of the emergency equipment at the Pioneer Road facility are identified in Drawings 716601-QJPB002, Rev D and 716601-QJPB700, Rev G which are included as part of this Attachment.
- 3.E.III.b. The metal storage shelter includes a dry chemical fire suppression system and a fire hydrant is located within 185 feet of the southeast corner of the facility having a maximum flow of 5,900 gallons per minute.

# **TABLE 1-ATTACHMENT 3**

# **EMERGENCY EQUIPMENT**

<u>QUANITY</u>	TYPE OF EQUIPMENT
1	30 gallon drum of sand
1	55 gallon trash bin for spill containment
1	Safety Cabinet that contains: <ul> <li>a. 2 respirators</li> <li>b. 2 tyvek suits</li> <li>c. 2_rubber aprons</li> <li>d. 2 pair of gloves</li> <li>e. 2 face shields</li> </ul>
1	Eyewash Center (The central eyewash station is located inside the warehouse near the south exit. Heated portable stations are located west of the storage tanks).
1	Emergency wool blanket
2	Square point shovels
1	Squeege
1	First aid kit
2	Double pail buckets for decontamination
1	Safety Communication Center  a. <u>MSDS-SDS</u> binder  b. Pamphlets- the <u>MSDSSDS</u>
2	10-pound ABC fire extinguishers

Insert Drawings 716601-QJPB002, Rev D and 716601-QJPB700, Rev G

#### **ATTACHMENT 4**

#### PERSONNEL TRAINING

#### 4.A. OUTLINE OF TRAINING PROGRAM

4.A.I. Safety-Kleen shall provide training to all employees within the first six months of the employee's hire date with an annual review thereafter. Each employee involved in hazardous waste management shall be trained to operate and maintain the facility safely, and to understand hazards unique to his/her job assignment. The training given to each employee shall be reflective of his or her job duties and other responsibilities at the facility, and may include classroom, on-the-job and independent study modules.

#### 4.B. DESCRIPTION OF THE TRAINING PROGRAM

4.B.I. The Branch Manager conducts the required personnel training or may designate a qualified alternatePersonnel training is provided through multiple sources, examples include: Branch Manager, Online Learning, Health & Safety and Environmental Managers, and the Safety-Kleen Training Department. Training for the Branch Manager comes from both Safety Kleen Environmental Health & Safety and regional environmental engineers. The training is sufficient to allow the Branch Manager to then train facility employees. Records of required personnel training shall be maintained at the facility and/or electronically in a format viewable at the facility. An example outline of the introductory and continuing training for facility employees is contained in Table 1-ATTACHMENT 4- and is the minimum required introductory and continuing training for facility employees. An example outline of the training for Branch Managers is included in Table 2-ATTACHMENT 4- and is the minimum required training for the facility Branch Manager. Appendix A ATTACHMENT 4 identifies the job titles and associated job descriptions found at the facility.

#### 4.C. INTRODUCTORY TRAINING

- 4.C.I. Introductory training shall be provided for all employees at the facility. The training shall include, as applicable, the topics described in R315-8-2.7(a)(3)R315-264-16(a)(3), and the following topics relevant to each employee's duties or responsibilities at the facility, and any specific training for their job position as described in Condition 4.F. of this attachment.
- 4.C.I.a. The Waste Analysis Plan, ATTACHMENT 1.
- 4.C.I.b. The Contingency Plan, ATTACHMENT 2.
- 4.C.II. Introductory training shall be completed within six months after the date of employment or assignment to the facility, or starting a new position at the facility.

Employees shall not work in an unsupervised position related to hazardous waste management until the introductory training requirements described in this section have been completed.

#### 4.D. CONTINUING TRAINING

4.D.I. Employees at the facility shall receive refresher training annually to review the topics described in Condition 4.C. of this Attachment. Annual refresher training shall be taken in the same calendar quarter of the years following completion of the initial training, i.e., if the initial training was completed January 15<sup>th</sup>, then the refresher training shall be completed by the end of the first quarter in the next and subsequent calendar years. The annual training shall also include updates on environmental regulations, an in-depth review of the Contingency Plan, and a review of RCRA inspection criteria.

#### 4.E. TRAINING PROGRAM MANAGER QUALIFICATIONS

- 4.E.I. The training program shall be directed by an individual trained in hazardous waste management procedures. Qualified personnel shall provide training for employees. The following describes the specific qualifications for the training program manager and on-the-job instructors.
- 4.E.I.a. Training Program Manager
- 4.E.I.a.i. The Branch Manager or designee shall be responsible for managing the training program at the facility. The Branch Manager or designee shall possess experience or education in hazardous waste management, as well as the experience and qualifications necessary to train employees on the facility-specific operational issues.
- 4.E.I.b. On-the-Job Instructors
- 4.E.I.b.i. The Branch Manager or designee shall perform on-the-job training for employees. In either case, the instructor shall be skilled in the current methods of facility operation and duties of the job.

#### 4.F. TRAINING APPLICABLE TO JOB TASKS

- 4.F.I. The training program is designed to familiarize employees with the emergency procedures and equipment, environmental regulations, and record keeping procedures relevant to the jobs they perform. The program shall ensure that all facility personnel will be able to respond appropriately to an emergency at the facility. Job duties and specific training applicable to each job title at the facility are described below.
- 4.F.I.a. BRANCH MANAGER

4.F.I.a.i.

The branch manager Branch Manager at the facility shall be responsible for the compliance, operation, and maintenance of the facility along with directing sales activities. This position shall be responsible for assuring that the facility operates within the requirements of the permit and applicable regulations and shall be responsible for acting as the emergency coordinator during implementation of the contingency plan. He/she conducts required personnel training or may designate a qualified alternate. The Branch Manager will possess the training described in Table 2-ATTACHMENT 4.

#### 4.F.I.b. SALES AND SERVICE STAFF

4.F.I.b.i.

Safety-Kleen sales and service personnel pick-up wastes from Safety-Kleen customers (as well as sales related duties) and are responsible for assuring that waste is picked up in compliance with the Waste Analysis Plan, ATTACHMENT 1 of this Permit. Sales and service personnel who are involved with sampling and analysis activities required under the Waste Analysis Plan shall be properly trained in performance of these duties. Specific training for sales and service personnel shall include at a minimum:

4.F.I.b.i(A).

Applicable occupational health and safety requirements for workers at hazardous waste treatment, storage, and disposal facilities, including use of personal protective equipment;

4.F.I.b.i(B). Sampling protocol;

4.F.I.b.i(C). Methods for performing required testing (where applicable for on-site personnel); and

4.F.I.b.i(D). Record keeping requirements for activities required under this permit.

4.F.I.b.ii.

Sales and service personnel shall also be trained in manifests, facility inspection records, and training records. Sales or service personnel may also be trained to conduct the facility inspections or act as an emergency coordinator during implementation of the Contingency Plan.

#### 4.F.I.c. WAREHOUSE EMPLOYEES

4.F.I.c.i.

The facility warehouse employees (e.g., Lead Material Handler/Material Handlers) are responsible for loading and unloading waste off the trucks, bulking waste when applicable, and maintaining the container storage areas (as well as the other facility maintenance duties) in accordance with the permit and applicable regulations.

4.F.I.c.ii.

Warehouse employees shall be trained to maintain the service center and assist the other branch employees in their tasks. A warehouse employee may also be trained to conduct the facility inspections or act as an emergency coordinator during implementation of the Contingency Plan. Specific training for the warehouse

employees shall include at a minimum:

- 4.F.I.c.ii(A). Applicable occupational health and safety requirements for workers at hazardous waste treatment, storage, and disposal facilities, including use of personal protective equipment;
- 4.F.I.c.ii(B). Methods for performing required testing or acceptance of wastes as described in the Waste Analysis Plan, ATTACHMENT 1; and
- 4.F.I.c.ii(C). Record keeping requirements for activities required under this permit.

#### 4.F.I.d. ADMINISTRATIVE EMPLOYEES

4.F.I.d.i. The facility's administrative staff, (e.g., Lead Administrative Assistant/Branch Secretaries Senior Branch Administrator/Branch Administrator) are responsible for providing support to the Branch Manager and the sales Sales and service Service representatives Representatives in their daily tasks. Administrative employees are also responsible for maintaining the facility files and other office duties as required. Administrative employees shall be trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they shall check it for accuracy and completeness and then process or file it as required. Additional training shall be overseen by the Branch Manager and shall be completed within six months of hiring.

#### 4.G. TRAINING RECORDS

4.G.I. Training for facility personnel shall be documented in the facility operating record as hardcopy records or retrievable electronic files. Training records on current personnel shall be kept until closure of the facility; training records on former employees shall be kept for at least three years from the date the employee last worked at the facility. An up-to-date written-organization chart identifying all facility employees and their current job titles shall be maintained on-site at the facility or in a retrievable format for review.

#### **TABLE 1-ATTACHMENT 4**

# EXAMPLE INTRODUCTORY AND ANNUAL TRAINING TOPICS FOR FACILITY EMPLOYEES

- A. Hazard Communication-Safety Training Environmental Regulation Update
- B. Hazard Communication Understanding the MSDSPart A and Part B Permit Requirements
- C. Waste Analysis Plan-

Includes a review of the Part B permit; Sampling and analysis procedures including specific gravity (except for branch Branchsecretaries Administrators); and record keeping.

D. Preparedness and Prevention and Contingency Plan-

This includes emergency procedures contained in the Part B permit, including:

- 1. Procedures for use, inspection, repair and replacement of facility emergency response equipment shall be reviewed.
- 2. Communications and alarm systems.
- Response to fires and explosions.
- 4. Response to groundwater contamination incidents.
- Shutdown procedures for facility operations.
- E. Preventing Injuries and Illness Contingency Plan and Emergency Procedures
- F. Hazards Associated with Handling Hazardous Materials Annual Review of Training

Respirator Fit Test for those employees requiring respirator use

- G. Chemistry of Safety Kleen Products Facility Inspections
- H. Hazardous Materials Regulations Manifesting Requirements
- I. Manifesting Spill Reporting (Includes a Review of SPCC Plan)
  - J. Spill Simulations and Spill Reports Waste Minimization
  - K. Storm Water Pollution Prevention Plan

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# TABLE 2-ATTACHMENT 4 EXAMPLE TRAINING PLAN OUTLINE - BRANCH MANAGER

#### **Branch Manager Training:**

Classroom training for the Branch Manager includes the following:

A review of the Part B permit and Utah Hazardous Waste Regulations including:

Part A Application

Waste Analysis Plan (includes training in specific gravity sampling and analytical methods)

Preparedness and Prevention Plan

Inspection Plan, including identification of malfunctions, deteriorations, or other problems at the site

Closure Plan and Financial Assurance Requirements

Training Plan

Reviewing of warehouse and secretary responsibilities Orientation and training of branch personnel

Contingency Plan training, including:

Spill simulation, response, and spill reporting

Fire and explosion procedures

Shutdown of operations

Local emergency information

Local authority information

Emergency equipment, including

Use

Inspection

Repair

Replacement

Operating Procedures, including

Tank and Container Management procedures

Solvent scheduling

Inventorying

Health and Safety, including

OSHA training and reporting

Manifesting procedures and Land Ban Notifications, including

Tranship labeling

Transportation licensing



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List of Salt Lake City, Utah Service Center Employee Positions
Branch General Manager
Branch Secretary
Lead Administrative Assistant
Customer Service Technician
Sr Customer Service Rep
Customer Service Representative Vac
Customer Service Representative, Oil
Lead Material Handler
Material Handler

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	Branch Secretary job description
	-Lead Administrative Assistant job
description	·
	Customer Service Mgr job description
	Market Sales Specialist Hunter job
description	
	Major Account Specialist job description
	Customer Service Technician job
description	·
	Customer Service Rep job description
	Sr Customer Service Rep job description
	Customer Service Representative Vac job
description	
	-Customer Service Representative, Oil job
description	1 , 3
	Lead Material Handler job description
	Material Handler job description

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#### **ATTACHMENT 5**

#### INSPECTIONS

# 5.A. <u>INSPECTION PROCEDURES</u>

- 5.A.I. The inspections outlined in this Attachment are the minimum required. All inspections required by this permit shall be documented on forms and maintained as part of the facility operating record in electronic or hardcopy format. Copies of the Example inspection forms, showing the minimum inspection requirements, are found in Appendix A-ATTACHMENT 5.
- 5.A.II. The Branch Manager or designee (the inspector) shall be responsible for carrying out and documenting the facility inspections each business day. The inspector shall note any identified ruptures, spills, or repairs that are needed and note remedy actions. If the inspector cannot carry out the repairs, the inspector shall work with an engineering project manager at Safety-Kleen's corporate headquarters to complete the repairs. Completion of repairs shall be noted on the Facility inspection record.
- 5.A.III. Facility inspections shall include the following:
- 5.A.III.a. Tank inspections -- Tanks holding the clean solvent and the tank holding the spent solvent shall be inspected at least once each business day. The inspections shall include checks of the high level alarm and of the volume of solvent held in the tank. Sudden deviations in the solvent volumes shall be immediately investigated and the cause determined. If necessary, repairs shall be initiated immediately. Pick-ups of spent solvent shall be scheduled on a regular basis. The spent solvent quantity shall not exceed the permitted tank volume at any time. The tanks are equipped with high-level audiovisual alarms and manual shut-off valves.
- 5.A.III.b. The secondary containment for the tanks shall be inspected each business day for cracks or other deterioration. Any damage to the tanks (such as rust or loose fixtures) or the secondary containment shall be noted and repairs initiated.
- 5.A.III.c. Air emission inspections shall be conducted on the waste tank and ancillary equipment in accordance with Condition 5.B. of this attachment.
- 5.A.III.d. Air emission inspections shall be conducted on the containers and tank system in accordance with Condition 5.C. of this attachment.
- 5.A.III.e. Solvent dispensing equipment -- The solvent dispensing hose, connections and valves shall be inspected for damage (such as cracks or leaks) and proper functioning. Any solvent left in the hoses shall be drained after use. The pumps, pipes and fittings shall be checked for damage and proper functioning. Any damage to the solvent dispensing equipment shall be noted and repaired.

- 5.A.III.f. Container storage areas -- Container storage areas shall be inspected for the number and condition of the drums stored. The total volume of the materials held in the container storage areas shall not exceed 4,500 gallons for the warehouse container storage area and 3,300 gallons for the metal shelter container storage area. Any leaking or suspect drum shall be placed in a salvage drum of adequate integrity. Drums shall be inspected to determine if they are properly labeled and marked in accordance with U.S. DOT\_requirements and R315 of the rules. The secondary containment system, condition of the pad and sumps shall be inspected for deterioration or failure. If cracks or leaks are detected, they shall be repaired immediately.
- 5.A.III.g. Route vehicles -- Each route vehicle shall be inspected to ensure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment shall be inspected to determine if sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses are in the vehicle. Any missing equipment shall be replaced before the vehicle is used.
- 5.A.III.h. Dumpster/drum washers -- The dumpsters/drum washers at the return and fill station shall be inspected for leaks and sediment build-up. Any leaks shall be noted and repaired immediately and excess sediment shall be removed from the dumpster.
- 5.A.III.i. Safety equipment -- The fire extinguishers shall be checked weekly to ensure that the units are charged and accessible, and shall be inspected annually. The fire suppression system shall be checked weekly to ensure that the unit is charged and shall be inspected annually. In addition, proper operation of the eyewash shall be confirmed and the first aid kit and sorbents shall be inspected for adequate content and accessibility each week. The identity and location of the emergency equipment required at the facility is included in ATTACHMENT 3, Preparedness and Prevention.
- 5. A.III.j. Security -- The operation of each gate and lock shall be inspected weekly. In addition, the fence and danger signs shall be inspected for deterioration on a weekly basis.

# 5.B. <u>SUBPART BB INSPECTION PROCEDURES FOR TANK/DRUM</u> <u>WASHER SYSTEM</u>

- 5.B.I. These inspection procedures identify leaks from pumps, valves, flanges and other equipment associated with the return and fill station/drum washer and tank system and demonstrate compliance with the inspection requirements of R315-8-18R315-264-1050 through 1065. The organic liquid in these systems meets the definition of "in heavy liquid service" as defined in R315-8-18R315-264-1050 through 1065 (specifically R315-264-1051).
- 5.B.II. Pumps/Valves/Flanges/Other Equipment

5.B.II.a.	Each pump, valve, flange and other equipment as defined in R315-8-18 R315-264-1050 through 1065 (specifically 40 CFR 264.1051R315-264-1051) shall be marked with a unique ID as indicated on Drawing 7113-5600-350, Rev F in ATTACHMENT 7. All piping under the return and fill dock is subject to Subpart BB except for the product piping that is painted green and orange.
5.B.II.b.	Each pump, valve, flange and other equipment regulated by Subpart BB shall be inspected each operational day for any evidence of leakage, which is indicated by any visual sign of liquids leaking/dripping from the equipment.
5.B.II.c.	Evidence of leakage and means determined shall be noted on the inspection log.
5.B.II.d.	When a leak is detected, it shall be repaired as soon as practical, but not later than 15 calendar days after being detected, except as provided in 40 CFR 264.1059R315-264-1059.
5.B.II.e.	Should a leak be detected, a first attempt at repair (e.g., tightening the packing gland) shall be made no later than five calendar days after the leak is detected.
5.B.II.f.	Equipment discovered to be leaking shall be identified with a weatherproof tag containing the following information:
5.B.II.f.i.	Equipment I.D number; and
5.B.II.f.ii.	Date leak found.
5.B.II.g.	A tag indicating a leak may be removed after effective repairs are made.
5.B.III.	Results of Subpart BB inspections shall be recorded in the facility operating record in electronic or hardcopy format. Example inspection forms are found in Appendix A-Attachment 5on the Inspection Log Sheet for Daily Subpart BB Inspection of Storage Tank System.
5.B.IV.	Corrective action for each Subpart BB leak shall be recorded <u>in the facility</u> operating record in electronic or hardcopy formaton the Inspection Log Sheet for Daily Subpart BB Inspection of Storage Tank System.
5.C.	SUBPART CC INSPECTION PROCEDURES FOR CONTAINERS AND TANK SYSTEM
5.C.I.	The Permittee shall inspect containers subject to Level 1 controls and their covers and closure devices as follows:
5.C.I.a.	In the case when a hazardous waste is already in the container at the time the Permittee first accepts possession of the container at the facility and the container is not emptied within 24 hours after the container is accepted at the facility, the

Permittee shall visually inspect the container and its cover and closure devices to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall make first attempts at repair no later than 24 hours after detection and the repair shall be completed as soon as possible, but not later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

5.C.I.b.

In the case when a container used for managing hazardous waste remains at the facility for a period of 1 year or more, the Permittee shall visually inspect the container and its cover and closure devices initially and thereafter, at least every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall make first attempts at repair no later than 24 hours after detection and the repair shall be completed as soon as possible, but not later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

- 5.C.II.
- The Permittee shall inspect containers subject to Level 2 controls and their covers and closure devices in accordance with R315-8-22-R315-264-1080 through 1090 (specifically-40 CFR 264.1086(d)(4)R315-264-1086(d)(4)).
- 5.C.III.
- The Permittee shall inspect the tank system air emission control equipment in accordance with the following requirements:
- 5.C.III.a.
- The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices.
- 5.C.III.b.
- The Permittee shall perform an inspection of the fixed roof and its closure devices at least once every year except as allowed below:
- 5.C.III.b.i.
- Following the initial inspection of the cover, subsequent inspection may be performed at intervals longer than one year under the following conditions:
- 5.C.III.b.i(A).
- In the case when inspecting the cover would expose a worker to dangerous, hazardous, or other unsafe conditions then the Permittee may designate a cover as an "unsafe to inspect cover" and comply with the following requirements:

- 5.C.III.b.i(A)1. Prepare a written explanation for the cover stating the reasons why the cover is unsafe to visually inspect, if required.
- 5.C.III.b.i(A)2. Develop and implement a written plan and schedule to inspect the cover as frequently as practicable during those times when a worker can safely access the cover.
- 5.C.III.c. In the event a defect in the fixed roof or its closure devices is detected, the Permittee shall repair the defect in accordance with the following schedule: The Permittee shall make first efforts at repair of the defect no later than five calendar days after detection, and the repair shall be completed as soon as possible but no later than 45 calendar days after detection unless the Permittee determines that repair of the defect requires emptying or temporary removal from service of the tank and no alternative tank capacity is available at the site to accept the hazardous waste normally managed in the tank. In this case, the Permittee shall repair the defect at the earliest available time when transfer of waste to the tank could be suspended and the tank emptied or removed from service. Repair of the defect shall be completed before the transfer of waste to the tank resumes.

# APPENDIX A – ATTACHMENT 5 INSPECTION FORMS

Insert - Inspection Log Sheet for Daily Inspection of Storage Tank System (3 pages)

- Inspection Log Sheet for daily inspection of Container Storage Area (1 page)
- Inspection Log Sheet for weekly inspection of Safety and Emergency Equipment, Security Devices and Miscellaneous Equipment (1 page)

## INSPECTION LOG SHEET FOR:

# Daily Inspection of CONTAINER STORAGE AREA

(A separate log must be completed for each storage area.)

PERMITTED STORAGE V	OLUME										
INSPECTOR'S NAME/TIT	LE										
		ł	NSPEC	TOR'S S	IGNATU	RE:	<u> </u>				
MONDAY	TUESDAY		1	VEDNES	DAY		THURS	DAY		FRIDA	Y
				/	J			J			/
TIME		<del></del>			<del>.</del>			<del></del>	_		<del></del>
CONTAINERS		МС	ON.	Т	UES.	W	ED.	TH	URS.	F	RI.
Total Volume* of	** waste:						<del></del>			1	
Total Volume of	** waste:									+	<del></del>
Total Volume of	** waste:					1					
Total Volume of	· L_										
Total Volume of	:[										
OTAL VOLUME (IN GALL	ONS):										
If 'N', circle appropriat other:Condition of Containers:  If 'N', circle appropriat other:	e problem: missing	A or loos	N	А	N	А	N	Α	N ks, distor	A tion,	N
tacking/Placement/Aisle S If 'N', circle appropriat pallets, other:	e problem: different	from Pa	art B Flo	A oor Plan,	N container	A s not on p	N allets, ur	A nstable sta	N acks, bro	A ken or dan	N naged
CONTAINMENT	-									· <del>-</del> •	
Curbing, Floor and Sump(s):		Α	N	Α	N	Α	N	Α	N	Α	N
Any material which spills, le f it being discovered.)  If 'N', circle appropriate other:	e problem: ponding	/wet sp							ely remov	ved within	24 hou
oading/Unloading Area:		Α	N	Α	N	Α	N	Α	N	Α	N
If 'N', circle appropriate	e problem: cracks, o	deterior	ation, po	onding/we							
				·					<u> </u>	ABLE":	

<sup>(</sup>IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE' NOT ACCEPTABLE' ROW) FORM 1100-08-04

# INSPECTION LOG SHEET FOR:

Weekly Inspection of SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES AND MISCELLANEOUS EQUIPMENT

NSPECTOR'S NAME/T	t	NSPECTOR'S SIGNATUR	RE:	
(SIGN ON THE DAY	INSPECTION IS PERF	ORMED; PERFORM INSP	ECTION ON THE SAME I	DAY EVERY WEEK.)
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
/ / DATE: (M / D / Y )				//
TIME				
AFETY AND EMERGE ire Extinguishers:		e inspection, inadequately	A* N charged, inaccessible, oth	ner:
ire Suppression system If 'n', circle appr		e inspection, inadequately	A N charged, other:	
yewash and Shower If 'n', circle appr malfunctioning o	opriate problem: disconi drain, leaking, other:	nected or malfunctioning va	A N alves, inadequate pressure	e, inaccessible,
irst Aid Kit: If 'N', circle appi	ropriate problem: inadeq	uate inventory, other:	A N	
pill Cleanup Equipmen If 'N', circle appr mops, empty dr	opriate problem: inadeq	uate supply of sorbent, tow	A N vels and/or clay, inadequa	te supply of shovels,
respirators, eme	ropriate problem: inadeq ergency respirators, eme	uate supply of malfunction rgency respirator is missing ment, other:	g components, items requ	gloves. Glasses, iring security or clean
communication Devices If 'N', circle appr intercom, emerg	opriate problem: inadeq	uate supply of telephones, rk, telephones are not loca	A N malfunctioning telephone ated where needed, other:	(s), malfunctioning
ECURITY DEVICES ates and Locks:		յ, corrosion, lack of warning	A N	
ence: A N  If 'N', circle appr  IISCELLANEOUS EQU		ties, corrosion, holes, disto	ortion, other:	
ry Dumpster:		orrosion, split seams, deteri	A N oration, excess debris, liqu	uids in unit, other:
BSERVATIONS, COMME	ENTS, DATE AND NATUR	E OF REPAIRS OF ANY ITE	MS INDICATED AS "NOT AC	CCEPTABLE":
		\		· · · · · · · · · · · · · · · · · · ·

<sup>(</sup>IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE'NOT ACCEPTABLE' ROW)

# Safety-Kleen Pioneer Road Draft Permit Renewal Fact Sheet

The Safety-Kleen Systems, Inc., Pioneer Road facility has submitted an application to the Utah Division of Waste Management and Radiation Control to renew its State of Utah hazardous waste permit. The current state hazardous waste permit for the Safety-Kleen Pioneer Road facility was issued July 15, 2015.

The Director of the Division of Waste Management and Radiation Control has reviewed the permit renewal application, and determined that the permit renewal application is complete and contains sufficient information to issue a draft permit. A draft permit for the Safety-Kleen Pioneer Road facility has been issued and is available for review during the public comment period. The public comment period on the decision to issue a draft state hazardous waste permit to the Safety-Kleen Pioneer Road facility begins on Thursday, August 11, 2016, and will end on Monday, September 26, 2016, at 5:00 p.m.

A public hearing to receive comment on the draft decision to reissue a state hazardous waste permit to the Safety-Kleen Pioneer Road facility has been scheduled for Tuesday, September 13, 2016, at 6:00 p.m. in the Boardroom, Room 1015 of the Multi Agency State Office Building, 195 North 1950 West, Salt Lake City, Utah, 84116.

The draft permit can be viewed at:

Division of Waste Management and Radiation Control Multi Agency State Office Building 195 North 1950 West, 2nd Floor Salt Lake City, Utah 84116

For the public's convenience, an unofficial copy of the draft permit is available on the Internet at http://www.deq.utah.gov/NewsNotices/notices/waste/index.htm#phacp

Written comments will be accepted if received by 5:00 p.m. on September 26, 2016, and should be submitted to the address below. Comments can also be hand delivered to the Division address above and must be received by 5:00 p.m. on September 26, 2016.

Scott T. Anderson, Director Division of Waste Management and Radiation Control Department of Environmental Quality P.O. Box 144880 Salt Lake City, Utah 84114-4880

Comments can also be sent by electronic mail to: <a href="mailto:dwmrcpublic@utah.gov">dwmrcpublic@utah.gov</a>. Comments sent in electronic format should be identified by putting the following in the subject line: Public

Comment on Safety-Kleen Draft Permit Renewal. All documents included in comments should be submitted as ASCII (text) files or in pdf format.

Following the public comment period on the draft Safety-Kleen Pioneer Road permit, all public comments will be evaluated and where appropriate will be included in the final decision on whether to reissue the permit. A final permit determination will then be made and the corresponding action taken.

Under Utah Code Section 19-1-301.5 a person who wishes to challenge a Permit Order may only raise an issue or argument during an adjudicatory proceeding that was raised during the public comment period and was supported with sufficient information or documentation to enable the director to fully consider the substance and significance of the issue.

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The Safety-Kleen Pioneer Road facility provides solvent distribution, collection, and reclamation to companies primarily engaged in automobile repair and industrial maintenance services. The facility collects petroleum and aqueous solvents and paint wastes. All wastes brought into the facility are ultimately shipped off-site for recycling, treatment or disposal.

The Safety-Kleen facility, located at 1066 South Pioneer Road in Salt Lake City, has a state hazardous waste permit to store hazardous wastes in containers and in a 15,000-gallon storage tank.

Currently there are two permitted container storage areas at the facility. The warehouse storage area located inside the main warehouse building at the facility has a capacity of 4,500 gallons of containerized waste and is used to store spent parts washer solvent and spent immersion cleaner. Other materials, including non-hazardous wastes, universal wastes, 10-day transfer wastes and products may be stored in the warehouse storage area. The second container storage area is the metal paint waste storage building. This storage area is a separate building from the warehouse and is used to store paint wastes. It has a current capacity of 3,300 gallons and may also be used to store product.

Spent solvent from parts washers is typically accumulated in the facility waste solvent storage tank. Containers of parts washer solvent are emptied into one of two dumpster/drum washers in the return and fill station on the warehouse dock. A pump in the dumpster/drum washer pumps the solvent into the waste storage tank. On a regular basis, 6,000-7,000 gallons of waste solvent are pumped to a tanker and sent off-site for recycling. The waste tank is an above ground tank and has a current permitted capacity of 13,986 gallons

The draft permit consists of four modules and eight attachments. A summary of each module and attachment follows, with significant changes from the current permit noted.

**Module I, Standard Conditions:** Module I contains the standard permit conditions outlined in R315-270-30.

Module I includes a corrective action condition if such action is determined necessary in the future. The module also defines the terms used throughout the permit.

The draft permit updates the references to state hazardous waste rules and the updated name of the Division of Waste Management and Radiation Control.

**Module II, General Facility Conditions:** Module II contains the general facility conditions, including those relating to waste analysis, security, inspections, personnel training, preparedness and prevention, contingency plan, manifest system, record keeping, closure, liability and financial assurance and the land disposal restriction requirements.

Module II identifies the permitted wastes that may be managed at the facility as well as those wastes that are prohibited from being accepted and managed at the Safety-Kleen Pioneer Road facility.

The draft permit updates the references to state hazardous waste rules and eliminates the requirement to test parts washer solvent and immersion cleaner at the time of waste pickup. This requirement has been determined to be unnecessary and is not required under similar Safety-Kleen permits in other locations. Subsequent specific gravity testing requirements for incoming loads at the Safety-Kleen Pioneer Road facility were also eliminated.

The used oil portion of the closure cost estimate has been removed in the draft permit as this estimate and coverage is provided for elsewhere under separate approvals and the liability insurance provider has been updated in the draft permit to reflect the current coverage by Indian Harbor Insurance Company.

**Module III Storage and Treatment in Containers:** Module 3 contains the requirements relating to storage of wastes in containers at the Safety-Kleen Pioneer Road facility specifying the wastes that are acceptable and prohibited in the container storage areas.

Module III of the draft permit incorporates organic air emission standards for containers found in R315-264-1080 through 1091.

The draft permit updates references to the state hazardous waste rules.

**Module IV, Storage in Tanks:** Module IV specifies the requirements applicable to the hazardous waste storage tank system at the Safety-Kleen Pioneer Road facility.

Module IV of the draft permit incorporates applicable organic air emission standards from R315-8-22 and R315-8-18.

The draft permit updates reference to the state hazardous waste rules.

The draft permit incorporates new conditions in Module IV addressing air emissions from the dumpster/drum washer(s) that were not addressed previously in the permit.

**Attachment 1, Waste Analysis Plan:** The Waste Analysis Plan specifies the procedures to approve a waste stream for management at the Safety-Kleen Pioneer Road facility and outlines the minimum information collected and inspections/analysis performed on each load of incoming waste to ensure proper management/storage at the facility.

The draft permit updates references to the state hazardous waste rules.

**Attachment 2, Contingency Plan:** This attachment describes the actions to be taken by each employee in the event of a spill, fire, or other emergency. It includes the information necessary to address emergency situations efficiently and in a manner to prevent or minimize hazards to human health or the environment.

The draft permit updates references to the state hazardous waste rules.

**Attachment 3, Preparedness and Prevention Plan:** This attachment specifies the equipment and procedures in place to prevent and respond to emergencies at the Safety-Kleen Pioneer Road facility.

**Attachment 4, Personnel Training:** This attachment specifies the personnel training requirements for individuals working at the facility as the positions relate to hazardous waste management procedures.

The draft permit clarifies who provides the training at the facility and indicates that Table 1 and 2 provide the minimum required training for facility employees and the Branch Manager. The draft permit removes the requirement to complete continuing refresher training in the same calendar quarter as the original training and just leaves that requirement to complete continuing refresher training annually.

The draft permit removes Appendix A, Job Titles and Job Descriptions.

The draft permit clarifies that training records may be maintained in the facility operating record as hardcopy records or in a retrievable electronic file.

The draft permit updates references to the state hazardous waste rules.

**Attachment 5, Inspections:** This attachment specifies the inspections that will be conducted and the frequency for conducting these inspections to assure that malfunctions, deterioration, discharges, operator error, etc., at the facility do not lead to a release of hazardous waste

constituents to the environment or pose a threat to human health. R315-264 Subpart BB and CC inspection procedures have been incorporated into this attachment.

The draft permit clarifies that the example inspection forms in Attachment A are the minimum inspection requirement and that format of the forms can change. The facility inspection records can be maintained in the operating record as hardcopy files or electronic records.

The draft permit updates references to the state hazardous waste rules.

**Attachment 6, Closure Plan:** This attachment outlines the procedures that will be followed to close the Safety-Kleen Pioneer Road facility. The closure cost estimate, included as Appendix A to Attachment 6, has been recalculated in 2016 dollars and the reclamation cost estimate for the used oil facility has been deleted from this permit.

The draft permit updates references to the state hazardous waste rules.

**Attachment 7, Container Storage:** This attachment describes the two permitted container storage areas and includes drawings and construction details for each container storage area.

The draft permit updates references to the state hazardous waste rules.

**Attachment 8, Tank Storage:** This attachment describes the waste tank system at the Safety-Kleen Pioneer Road facility and includes drawings and construction details for the tank.

#### **ATTACHMENT 6**

#### **CLOSURE PLAN**

# 6.A. PURPOSE

6.A.I.

The Safety-Kleen Salt Lake City service center operates as a storage facility for hazardous wastes, and is required to close the hazardous waste management units in accordance with the closure requirements of R315-8-7R315-264-110 through 120. Closure of the hazardous waste management units at this facility will be carried out in accordance with the steps outlined in this plan. Safety-Kleen shall remove all hazardous wastes and residuals from the facility to a level that will be protective of human health and the environment.; therefore, upon completion of closure activities, the need for further maintenance and care will be minimized or eliminated. Appendix A of this attachment contains an estimated schedule and cost for the completion of final closure. The closure cost estimate is-was initially calculated in 2003 dollars and has been adjusted for inflation to make the estimate current as of 2016and includes both the hazardous waste management facility closure and reclamation of the used oil facility.

6.A.II.

The portions of the facility that are subject to closure include the spent solvent aboveground storage tank system, the warehouse container storage area, the return/fill station, and the metal shelter container storage area. This closure plan identifies the steps necessary to complete closure of each unit. Additionally, the closure plan includes provisions for potential re-use of the closed units onsite or offsite, if appropriate. Alternatively, the units may be dismantled and transported offsite for disposal or as scrap to an appropriate recycling facility.

#### 6.B. MANAGEMENT OF HAZARDOUS WASTE

6.B.I.

All wastes generated during closure activities shall be managed as hazardous waste until determined otherwise. The concrete secondary containment area for the hazardous waste storage tank, return and fill station, and the warehouse container storage area shall be decontaminated, as described in this plan. The hazardous waste storage tank, return and fill station, associated piping, and the metal shelter container storage area shall also be decontaminated as described in this plan. Hazardous waste that may be generated as part of the closure activities includes facility managed waste (i.e., solvents, sludges, paint waste and thinner, etc.) and wash/rinse water. Items will be considered decontaminated if the applicable performance standards specified in Table 1-ATTACHMENT 6 are met. Samples of final rinsate will be collected and analyzed as specified in Table 1-ATTACHMENT 6 to make this demonstration. Rinsates will either be managed as hazardous waste and transported under manifest to a permitted facility or will be held on the site pending analysis and characterization. All analysis will be performed by a Utah certified laboratory.

#### 6.C. ABOVEGROUND TANK AND ASSOCIATED PIPING

- 6.C.I. The aboveground storage tank is used for storage of spent parts cleaning solvents, which have been returned from customers. To safely clean and decommission the aboveground storage tank, the following activities shall be performed during partial or final closure (as appropriate):
- 6.C.I.a. Remove the remaining material from the aboveground waste solvent tank undergoing closure, and transfer the materials to a recycle center for reclamation or alternate facility for treatment;
- 6.C.I.b. Provide access to the tank;
- 6.C.I.c. Pressure wash (water/detergent solution) and triple rinse (water), scrape and squeegee the tank interior, removing all residual waste material and rinsate. The rinsate will-shall be sampled and analyzed in accordance with Table 1 of this attachment to demonstrate proper decontamination.
- 6.C.I.d. Disconnect and decontaminate applicable appurtenant piping and pumping equipment and clean the concrete secondary containment (if appropriate) around the tank undergoing closure. Appurtenant piping and equipment shall also be pressure washed with detergent-water solution and triple rinsed with water;
- 6.C.I.e. Visually inspect the tank, secondary containment, and appurtenant piping and equipment for evidence of staining and residue. If staining or residue is present, repeat steps outlined in Condition 6.C.I.c. of this attachment;
- 6.C.I.f. Reuse tank and appurtenant equipment onsite/<u>or</u> offsite or remove and dispose of as scrap metal. The closure cost estimate does not include credit for selling the tank or equipment. A certificate of destruction shall be included in the final closure certification; if the tank, piping and appurtenant equipment are disposed as scrap metal.
- 6.C.I.g. Decontaminate the diking and slab as indicated in this attachment at final closure; following partial or final closure, the tank may be reused in place in accordance with applicable regulations;
- 6.C.I.h. Backfill any excavations with clean fill materials; and
- 6.C.I.i. Transport and dispose of all waste material generated during the project. All associated cleaning equipment shall be thoroughly rinsed with a detergent solution and the rinsate shall be collected and disposed of in accordance with applicable regulations. Any hazardous wastes generated will be managed according to R315 of the Rules. The waste solvent tank shall either be decontaminated to the performance standards in Table 1–ATTACHMENT 6 or managed as hazardous waste.
- 6.C.II. The tank system secondary containment area shall be inspected during partial/final closure activities. If visual inspection during closure indicates an absence of waste-

related staining, cleaning of the secondary containment area may be deemed unnecessary. The secondary containment area shall be thoroughly cleaned (i.e., scrubbed, scraped, pressure washed and triple rinsed) if waste-related staining is observed during closure activities.

6.C.III. Tank Opening and Waste Removal

6.C.III.a. To safely open the tank and remove the waste material:

6.C.III.a.i. The contents of the tank shall be removed using a pump, vacuum pump unit, or similar equipment. The waste shall be transported in accordance with applicable regulations to a Safety-Kleen Recycle Center for reclamation or other appropriate reclamation or permitted treatment, storage and disposal (TSD) facility.

6.C.III.a.ii. To gain access to the waste solvent tank, the manway at the top of the tank shall be used. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care shall be exercised to minimize spark generation when working on the tank.

6.C.III.a.iii. Prior to entering the tank, personnel shall have full-face respiratory protection and protective clothing. Procedures for tank entry, purging, and venting a tank are described in various API standards and publications and in OSHA's "Permit Required Confined Spaces" (29 CFR Section 1910.146). The tank shall then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

6.C.IV. Removal of Residual Waste and Cleaning of Tank

6.C.IV.a. To safely remove the residual waste and clean the tank the following steps shall be taken:

6.C.IV.a.i. Before removing any residual waste from the tank, all piping and appurtenant equipment shall be flushed with a detergent water-solution and then triple-rinsed with water;

6.C.IV.a.ii. The method used to remove the residual waste material from the tank shall depended on the physical properties and quantity of material present. Prior to any person entering the tank, as much liquid and sediment as possible shall be removed;

6.C.IV.a.iii. Subsequent to vacuuming the majority of the material from the tank, it may be necessary to use a high-pressure wash system, and a detergent water-solution to rinse residual material from the walls, roof, and floor of the tank. A final water-rinse shall be used to flush the tank. The evacuated material and the rinse solution shall be shipped to an appropriate reclamation or permitted hazardous waste management facility (i.e., TSD, S-K recycle center). The quantity of wash/rinse water used shall be kept to a minimum in order to limit the amount of waste material generated. The water from the final rinse of the tank and the ancillary

equipment shall be analyzed in accordance with Table 1-ATTACHMENT 6 to demonstrate successful decontamination. In the event that analysis shows that the tank and/or the ancillary equipment fails the decontamination standards, decontamination steps shall be repeated as necessary or the tank, and/or-ancillary equipment, or both shall be managed as hazardous waste.

- 6.C.IV.a.iv. The waste solvent storage tank is considered a confined space (i.e., spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures. The procedures to be followed include:
- 6.C.IV.a.iv(A). The tank shall be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered;
- 6.C.IV.a.iv(B). Supply valves shall be closed and "tagged" and bleeder valves left open; or supply piping shall be disconnected;
- 6.C.IV.a.iv(C). Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Appurtenant power switches shall be tagged "Off";
- 6.C.IV.a.iv(D). On tanks where flammable vapors may be present, all sources of ignition shall be removed;
- 6.C.IV.a.iv(E). Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the tank, a test for combustible gases shall be taken. In all tankentering situations, an oxygen deficiency test shall also be performed prior to tank entry. The supervisor of the area in which the work is being done shall perform tests for combustible gas concentration and oxygen deficiency;
- 6.C.IV.a.iv(F). There shall be a set of wristlets or a rescue harness and sufficient rope at the job site to affect a rescue. Any other rescue equipment considered necessary by the supervisor shall also be on the job site;
- 6.C.IV.a.iv(G). Workers shall wear a rescue harness if entering the tank through a large enough opening to easily affect a rescue. If entering through a small opening, only wristlets may be used. In cases where there are agitator shafts, drums or other hazards in which the lifeline could be entangled and the supervisor in charge feels that wearing the lifeline may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated;
- 6.C.IV.a.iv(H). Appropriate personal protective equipment and supplied air breathing devices shall be used during tank entry. In cases of short-term entry for inspection or removal of objects, a self-contained breathing apparatus (SCBA) shall be used;
- 6.C.IV.a.iv(I). When a ladder is required to enter the tank, the ladder shall be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used;

- 6.C.IV.a.iv(J). Adequate illumination shall be provided and a flashlight or other battery-operated light shall also be on hand to provide illumination for a safe exit in the event of an electrical power failure;
- 6.C.IV.a.iv(K). All electrical equipment to be used inside the tank shall be in good repair and grounded;
- 6.C.IV.a.iv(L). Other people working in the immediate area shall be informed of the work being done, and they shall inform the watcher or supervisor immediately of any unusual occurrence that makes it necessary to evacuate the tank;
- 6.C.IV.a.iv(M). The Standby Observer System shall be implemented. It consists of the following:
- 6.C.IV.a.iv(M)(1). Workers inside a confined space shall be under the constant observation of a fully instructed standby observer;
- 6.C.IV.a.iv(M)(2). Before anyone enters the tank, the standby observer shall be instructed by the person in charge of the entry, that an entry authorization shall be obtained from the person in charge and whether a rescue harness or wristlets shall be used on the job;
- 6.C.IV.a.iv(M)(3). The standby observer shall also know the location of the nearest telephone (with emergency numbers posted), eyewash and/or shower, fire extinguisher and oxygen inhalator. For all "hot work" on the tank, the standby observer shall be instructed how to shut down the welding/burning equipment;
- 6.C.IV.a.iv(M)(4). As long as anyone is inside the vessel, the standby observer shall remain in continuous contact with the worker. HE/SHE IS NOT TO LEAVE THE JOB SITE EXCEPT TO REPORT AN EMERGENCY. He/she does not enter the tank until help is available;
- 6.C.IV.a.iv(M)(5). All welding and burning equipment shall be provided with a shutoff under the control of the standby observer; and the standby observer shall be shown how to shut off the equipment if it becomes necessary. Welding and burning equipment shall only be taken into a tank immediately prior to its use and shall be removed from the tank immediately after the job is finished; and
- 6.C.IV.a.iv(M)(6). For all "hot work" inside a tank, a properly executed permit shall be displayed at the job site and standard welding and burning safety precautions shall always be followed.
- 6.C.V. Following removal of the residual waste, the tank shall be pressure washed with detergent-water solution and triple rinsed with tap water. Washing/rinsing shall continue until the tank, associated piping and appurtenances appear visually clean. The final rinsate shall be sampled to determine the cleanliness of the tank. The final rinsate sample(s) shall be submitted to a qualified laboratory and analyzed as indicated in Table 1-ATTACHMENT 6. If the sample analytical results indicate the final rinsate meets the decontamination standards in Table 1, the tank system

shall be considered properly decontaminated and suitable for reuse or disposal as scrap metal.

6.C.VI. The residual waste materials and rinsate shall be collected and shipped to an

appropriate reclamation or permitted hazardous waste management facility (i.e.,

TSD, S-K recycle center).

6.C.VII. Removal or Re-use of the Tank

6.C.VII.a Following completion of closure activities, the closed tank may be reused onsite/ or

offsite or scrapped. If the tank and associated containment area undergoing closure will not be reused in the present location, the following procedures will be observed

to safely remove the tank:

6.C.VII.a.i. Disconnect all appurtenant piping;

6.C.VII.a.ii. Disconnect all appurtenant pumping equipment;

6.C.VII.a.iii. The tanks and piping shall be removed and recycled as scrap in accordance with

applicable rules. The contractor or scrap metal facility shall provide verification of

destruction;

6.C.VII.a.iv. The diking and slab shall be decontaminated and razed and disposed of at an

appropriate demolition debris or solid waste landfill. Following the razing of the

diking and slab, Raze the diking and slab and inspect the excavation; and

6.C.VII.a.v. Backfill the excavation with clean fill materials and grade to ground level.

6.C.VIII. Cleaning and Inspection of Secondary Containment Areas

6.C.VIII.a. The diked areas shall be dry swept prior to decontamination. All cracked areas

shall be sealed prior to commencement of cleaning to prevent migration of rinsate out of the containment area. The containment dike and floor area shall be pressure washed using a detergent-water solution and triple rinsed with water at final

closure. Following the final wash/rinse, the area shall be inspected to determine the effectiveness and completeness of decontamination. If necessary, the containment area shall be rewashed and/rinsed until visually clean. The final rinsate shall be sampled to determine the cleanliness of the secondary containment areas. The final rinsate sample(s) shall be submitted to a Utah-certified laboratory and analyzed as

indicated in Table 1-ATTACHMENT 6. If the sample analytical results indicate the final rinsate meets standards in Table 1, the secondary containment areas shall

will be considered properly decontaminated and suitable for reuse or scrapped.

6.C.VIII.b. If the tank is to be re-used onsite, the concrete slab and dike walls may also be left

in-place to function as secondary containment. An independent registered

Professional Engineer shall inspect the concrete secondary containment dike for the presence of unsealed cracks or gaps, etc. If the secondary containment passes the

inspection, soil sampling and analyses shall be considered unnecessary to complete

and document closure. If lapses of integrity are noted and determined to have the potential for wastes to migrate to underlying soils, soil samples shall be collected to evaluate the absence or presence of impacts in accordance with Condition 6.G.

# 6.D. <u>WAREHOUSE CONTAINER STORAGE AREA</u>

- 6.D.I. The warehouse container storage area is used for the storage of drums containing clean products, spent immersion cleaner, dry-cleaning waste, spent parts cleaning solvents, imaging/photochemical wastes, and transfer wastes segregated per the DOT and Uniform Fire Code guidelines. At closure, all drums shall be removed and transported to a Safety-Kleen Recycle Center or other appropriate reclamation or permitted disposal/treatment facility after proper packaging, labeling and manifesting.
- 6.D.II. Prior to cleaning the warehouse container storage area, all cracks shall be sealed. The concrete floor and spill containment trenches shall be cleaned with a detergent-water solution and triple rinsed with water. The final rinsate shall be analyzed in accordance with Table 1-ATTACHMENT 6 to document decontamination. The floor area and trenches will be washed/rinsed until visually clean to the extent practicable. Wash/rinse water shall be containerized in drums, tanker truck or other suitable container(s), and managed as hazardous waste in accordance with applicable regulations.
- 6.D.III. The floor area and trenches shall be considered properly decontaminated when free of waste-related residue/staining, are visually clean, and analytical results indicate the rinse water meets the standards in Table 1.
- 6.D.IV. Following decontamination, the secondary containment structure/area shall be inspected by an independent registered Professional Engineer. Soil sampling shall be conducted in accordance with Condition 6.G., if unsealed cracks, gaps or lapses of integrity are identified during the inspection.

#### 6.E. <u>SOLVENT RETURN AND FILL STATION</u>

- 6.E.I. The return and fill station is used to collect and return the spent parts cleaning solvent to the waste storage tank. At closure, the sediment in the dumpsters shall be removed and drummed, labeled, and manifested for proper treatment and disposal at an appropriate reclamation or permitted hazardous waste management facility (i.e., TSD, Safety-Kleen recycling center).
- 6.E.II. The dumpster and the dock area in the return and fill station shall be thoroughly decontaminated with a high-pressure detergent-water solution and triple rinsed with water, until visually clean. The final rinsate shall be containerized in a tanker truck or other suitable container(s). The clean dumpster and dock structure shall be reused by S-K or dismantled and recycled as scrap metal. If not reused, the verification of destruction (i.e., remelt) shall be provided by the contractor or scrap metal facility. A final rinsate sample shall be submitted to verify decontamination. The sample shall be analyzed in accordance with Table 1-ATTACHMENT 6. If the

analytical results indicate the rinse water meets the decontamination standards in Table 1, the return/fill station shall be considered properly decontaminated and suitable for reuse or scrapped.

6.E.III. Wash water and rinsate shall be containerized and shipped to an appropriate reclamation facility or permitted hazardous waste TSD facility (i.e., S-K recycle center) in accordance with applicable regulations.

6.E.IV. Following decontamination, an independent registered Professional Engineer shall inspect the secondary containment structure/area. Soil sampling shall be conducted in accordance with Condition 6.G., if unsealed cracks, gaps or lapses of integrity are identified during the inspection.

# 6.F. <u>METAL SHELTER CONTAINER STORAGE AREA</u>

6.F.I. The Metal Shelter Container Storage Area is used to store containers of permitted wastes and 10-day transfer wastes segregated per DOT and Uniform Fire Code guidelines, prior to shipment for reclamation or freatment. At closure, any residual waste shall be removed from the metal shelter and shipped to a reclaimer or appropriate treatment or disposal facility. The metal shelter and associated secondary containment pans will be thoroughly cleaned with a high-pressure detergent-water solution and triple rinsed. The rinsate will be collected, transferred to a tanker truck or other suitable container(s), managed as hazardous waste and transported to a permitted TSD (i.e., S-K recycle center).

6.F.II. A final rinsate sample will be submitted to verify decontamination. The final rinsate will be sampled and analyzed in accordance with Table 1-ATTACHMENT 6. If the analytical results indicate the rinse water passes the decontamination standard in Table 1, the unit will be considered properly decontaminated and suitable for reuse or scrapped. The metal structure will be reused by Safety-Kleen or dismantled and recycled as scrap metal. If not reused, the verification of destruction (i.e., remelt) will be provided by the contractor or scrap metal facility as part of the closure certification.

6.F.III. Following decontamination, an independent registered Professional Engineer will inspect the secondary containment structure/area. Soil sampling shall be conducted in accordance with Condition 6.G, if unsealed cracks, gaps or lapses of integrity are identified during the inspection, which may have allowed wastes to migrate to the subsurface.

#### 6.G. <u>SOIL SAMPLING AND ANALYSIS PLAN</u>

6.G.I. Soil sampling and analysis shall be conducted at final closure (if necessary) to document completion of closure. If there are cracks, gaps or lapses of integrity in the tank containment area, container storage areas, containment pans or return/fill station secondary containment area, which may have allowed waste migration to underlying soils, a sampling plan will be initiated to assess the absence/or presence of hazardous waste migration, potential HWMU or facility-related impacts and the

extent of impacts, if present. The sampling locations shall include previously identified unsealed cracks or gaps within each containment area.

6.G.II.

If a concrete containment area(s) or containment pans are to be dismantled and removed, samples shall be collected from immediately beneath the unsealed crack(s)/gap(s). If the concrete containment area(s) or containment pans are to remain in-place, samples shall be collected near the perimeter of the containment areas/pans, as close to the target crack(s)/gap(s) or lapses of integrity, as practicable or through a boring directly beneath the cracks/gaps as appropriate. The soil samples will be collected at a depth of approximately 6 to 12 inches beneath the bottom of the concrete containment structure or steel containment pan.

6.G.III.

The soil samples shall be submitted to a Utah certified laboratory and analyzed in accordance with Table 1-ATTACHMENT 6. Analytical results from soil sampling will be compared to regulatory or site-specific risk-based clean-up levels to document closure or determine the need for additional assessment or remedial action to complete closure.

6.G.IV.

If the concrete containment area(s) or containment pans are to be removed, samples shall be collected from underneath each unsealed crack or gap through which wastes may have potentially migrated to underlying soil. To gain access to the underlying soil, a boring may need to be constructed through the concrete with an electric rotary hammer drill, coring device, or equivalent. Soil samples shall be obtained from beneath the containment areas, in accordance with industry standards (i.e., hand auger, manual driven probe sampler, split-spoon sampler, or equivalent). The soil samples shall be collected in clean brass tubes or transferred to glass containers and sealed with Teflon lined lids/caps.

6.G.V.

In addition to the investigative samples collected from under the secondary containment areas (if any), additional samples may be collected at perimeter locations to evaluate background soil quality. If appropriate, the background soil samples will be collected at depth of 0 to 12 inches or the depth intervals representative of the investigative soil samples. The background soil samples (if collected) will be analyzed for the 8 RCRA metals using SW-846 methods.

6.G.VI.

The sampling equipment will be decontaminated (i.e., washed/rinsed) prior to use and between sampling locations. All rinse water will be collected and managed in accordance with applicable regulations. Decontamination activities will take place over a portable containment unit, the containment sumps within each container storage area, or equivalent.

6.G.VII.

If the analytical results for the investigative soil samples exceed the acceptable regulatory risk-based levels, the owner/operator (i.e., Safety-Kleen) shall prepare a remedial action plan/closure plan amendment and/or conduct a site-specific risk assessment. If conducted, the risk assessment results will be used to coordinate alternate clean closure objectives with the Director. Background soil quality results may also be evaluated and considered during development of acceptable clean closure objectives.

6.G.VIII.

The results shall be forwarded to the Director, with the subsequent closure progress or certification report. Depending on the results of the analyses and/or risk assessment, a closure plan addendum/remedial action plan <a href="may-shall">may-shall</a> also be submitted to the Director for approval. The closure plan amendment <a href="may-shall">may-shall</a> include procedures to evaluate the extent of facility-related impacts and/or plan for remedial action to complete closure.

6.G.IX.

Safety-Kleen is committed to achieving clean or risk-based closure. Therefore, if necessary, an appropriate closure plan amendment/remedial action plan will be implemented to efficiently and cost effectively complete closure. The closure remedial action program shall be designed to be consistent with applicable facility corrective action conditions and corrective measures programs. The additional closure activities or remedial action program may include a plan for additional sampling and analysis to determine the extent of facility-related subsurface impacts. Following completion of any additional soil assessment activities, an appropriate remedial action program shall be implemented to achieve clean or risk-based closure.

## 6.H. <u>FACILITY CLOSURE SCHEDULE AND CERTIFICATION</u>

- 6.H.I. Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen shall remove all hazardous wastes from the facility in accordance with this closure plan. The Director may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:
- 6.H.I.a. The facility has the capacity to receive additional hazardous wastes;
- 6.H.I.b. There is a reasonable likelihood that someone other than the Permittee will recommence operation of the facility within one year;
- 6.H.I.c. Closure of the hazardous waste management units is incompatible with continued operation of the site; and
- 6.H.I.d. Safety-Kleen has taken and will continue to take all steps necessary to prevent threats to human health and the environment, including compliance with all applicable permit requirements.
- 6.H.II. Alternatively, Safety-Kleen may decide to implement partial closure of the facility (i.e., close one or more, but not all permitted hazardous waste units). In this case, Safety-Kleen shall notify the Director of the intent to close one or more of the hazardous waste management units in accordance with this approved closure plan and any subsequent modifications. The notification to the Director shall include a schedule for the planned closure activities, identification of the unit(s) to be closed and unit(s) that will remain in use.

6.H.III.

The Permittee shall notify the Director at least 45 days prior to the date on which final closure of the facility is expected to begin. Safety-Kleen shall complete the planned closure activities in accordance with the approved closure plan within 180 days after receiving the final volume of wastes. If necessary, a request for an extension to this time frame may be submitted to the Director in accordance with R315-8-7-R315-264-110 through 120 (specifically-40 CFR-264.113(b))R315-264-113(b)).

6.H.IV.

Within 60 days of completion of the final closure activities, Safety-Kleen shall submit to the Director, a certification that the hazardous waste unit or facility, as applicable, has been closed in accordance with the approved closure plan and applicable regulations. This certification shall be signed by Safety-Kleen and an independent registered professional engineer and shall include a description of the unit(s) which underwent closure, field tasks performed, field log, sampling protocols, results of analyses, a summary of the facility status, quantity of waste removed, and supporting documentation including manifests and photographic documentation.

# **TABLE 1-ATTACHMENT 6**

# Safety-Kleen Salt Lake City Service Center Closure Plan Analytical Requirements

Unit	Media	EPA Methods <sup>1</sup>	Performance Standard
Tank Storage	Metal (Rinsate) <sup>2</sup>	Toxicity Characteristic -	Pass 261.24R315-261-24 <sup>3</sup>
		SVOC/VOCs and 8 RCRA Metals	
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Concrete (Rinsate) <sup>2</sup>	Toxicity Characteristic -	Pass <del>261.24</del> <u>R315-261-24</u> <sup>3</sup>
		SVOC/VOCs, and 8 RCRA Metals	
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Soil	Total SVOC/VOCs and 8 RCRA Metals	Below background/MDL <sup>4</sup> or Risk-Based levels
Return and Fill	Metal (Rinsate) <sup>2</sup>	Toxicity Characteristic -	Pass <del>261.24</del> <u>R315-261-24</u> <sup>3</sup>
Station		SVOC/VOCs and 8 RCRA Metals	
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Concrete (Rinsate) <sup>2</sup>	Toxicity Characteristic -	Pass 261.24R315-261-24 <sup>3</sup>
		SVOC/VOCs, and 8 RCRA Metals	
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Soil	Total SVOC/VOCs and 8 RCRA Metals	Below background/MDL <sup>4</sup> or Risk-Based levels
Warehouse Storage	Concrete (Rinsate) <sup>2</sup>	Toxicity Characteristic -	Pass 261.24R315-261-24 <sup>3</sup>
		SVOC/VOCs and 8 RCRA Metals	
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Soil	Total SVOC/VOCs and 8 RCRA Metals	Below background/MDL <sup>4</sup> or Risk-Based levels
Attachment 6 – Closure P Safety-Kleen Pioneer Roa		page 12	XXXX XX, 2016 March 22, 2013 UTD980957088

#### **TABLE 1-ATTACHMENT 6 - Continued**

Unit	Media	EPA Methods <sup>1</sup>	Performance Standard
Metal Shelter	Metal (Rinsate) <sup>2</sup>	Toxicity Characteristic -	Pass 261.24R315-261-24 <sup>3</sup>
		SVOC/VOCs and 8 RCRA Metals	
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Soil	Total SVOC/VOCs and 8 RCRA Metals	Below background/MDL <sup>4</sup> or Risk-Based levels

#### Notes

- 1 8260 for volatiles analysis; 8270 for semivolatiles analysis; 6010 for As, Ba, Cd, Cr, Pb, Se, and Ag; 7470 for Hg
- 2 Final rinsate samples after cleaning concrete/metal media
- 3 Safety-Kleen shall demonstrate passing <del>261.24</del>R315-261-24 on a dry weight correction basis
- 4 MDL = SW-846 Method Detection Limits

# ATTACHMENT 6 – CLOSURE PLAN APPENDIX A CLOSURE COST ESTIMATE

-Exhibit B-1, Closure Cost Estimate Worksheet Hazardous Waste Units
-Exhibit B-2, Closure Cost Estimate Worksheet for Used Oil Reclamation Facility

Insert

#### ATTACHMENT 7

#### **CONTAINER STORAGE**

# 7.A. <u>CONTAINER STORAGE</u>

- 7.A.I. The slab, curbing and collection trenches for the container storage area in the warehouse are made of steel-reinforced concrete and the concrete was poured so that no cracks or gaps exist between them. The curbing is four inches high and six inches wide and encompasses the storage area except where there is a trench. A steel grate covers the trench to facilitate the movement of drums across it. The warehouse container storage area trenches (i.e., containment) provide a capacity of 472 gallons. To comply with the storage capacity requirements of R315-89.6R315-264-175, the volume of waste stored in this area shall not exceed 4,500 gallons at any one time. The area is lined with a chemical resistant urethane coating or equivalent that is compatible with the materials stored.
- 7.A.II. The metal shelter container storage area and its secondary containment are constructed of sheet steel. An overhead door secures the shelter when drums are not being added to or removed from it. The containment capacity of the metal shelter container storage area is 1,683 gallons. To comply with the storage capacity requirements of R315-8-9.6R315-264-175, the volume of waste stored in the metal shelter container storage area shall not exceed 3,300 gallons at any one time.
- 7.A.III. All containers used in storing hazardous waste meet DOT specifications. The solvents in storage are incompatible only with strong oxidizers and reactive metals, none of which are present in the base or sealants that line the containment structure. All wastes are compatible with the containers in which they are stored in accordance with DOT container specifications.

Insert –

- -Site Plan Existing Dwg 7113-SPOO-001, Rev F
- -Floor Plan 1066 S. Pioneer Rd Dwg 716601-QJO1700, Rev 04
- -3 Bay Class 1B Transfer Shelter Dwg 716601-QJPB300, Rev A
- -Storage Shelter Class IB
- -Pad, Concrete for Class IB Storage Shelter
- -Fabrication Details for Class IB Storage Shelter
- -Existing Floor Plan Dwg 7113-WBOO-005, Rev 2
- -Metal Container Storage Shelter (shows layout for 15 spaces where waste may be stored in the metal storage shed)
- -Trench Detail Retrofit
- -Warehouse Storage Area Secondary Containment Calculation Sheet
- -Flammable Materials Shelter Secondary Containment Calculation Sheet
- -Chemical Resistant Urethane (3 pages of floor sealant description)
- -Drawing 7113-5600-350, Rev F

#### ATTACHMENT 8

#### TANK STORAGE

# 8.A. <u>TANK STORAGE</u>

8.A.I. The Safety-Kleen Facility has three storage tanks, one 12,000-gallon horizontal tank for clean solvent, one 15,000-gallon vertical tank for clean solvent and one a 15,000-gallon vertical tank for spent solvent. The 15,000-gallon spent solvent storage tank is 10' 6" in diameter and 23' 3" high and has an operating capacity of 13,986 gallons. It is constructed of 3/16" thick (1/4" thick in the lower third of the tank) carbon steel painted a light color to reflect sunlight. The tank is constructed in accordance with Underwriters Laboratories Standard 142 and it is located more than 20 feet from the property line in accordance with National Fire Protection buffer zone requirements. The secondary containment for the tanks consists of a monolithically poured slab and dike wall. The slab is six inches thick and the wall is eight-inch thick steel reinforced concrete. The words "Hazardous Waste" shall be marked on the spent solvent tank.

- 8.A.II. The tanks are equipped with an audible (siren) and visual (strobe light) high-level alarm system that will alert employees when a tank reaches 750 gallons from being full. There is an automatic feed cut-off in place in the dumpster/drum washer that shall be activated by the high level alarm to prevent further filling of the tank and possible overfill.
- 8.A.III. The return and fill station is a sheet steel structure as are the dumpster and drumwasher and the associated secondary containment. The dumpster unit is tight-piped to the tank and all piping is aboveground. The pump in the return and fill station pumps waste to the spent solvent storage tank.

# 8.B. SECONDARY CONTAINMENT CALCULATIONS FOR TANK

#### **DIKE VOLUME:**

Volume within the Dike walls =  $L \times W \times H \times 7.48 \text{ gal/ft}^3$ 49.583 ft  $L \times 18.5$  ft  $W \times 2.875$  ft  $\times 7.48 \text{ gal/ft}^3$  = 19,726 gal

Volume of sump =  $(\pi r^2 H) \times (7.48 \text{ gal/ft}^3) = \pi \times (0.75 \text{ ft})^2 \times 1.5 \text{ft} \times 7.48 \text{ gal/ft}^3 = \underline{20 \text{ gal}}$ 

Gross Containment 19,746 gal

VOLUME OF WASTE SOLVENT TANK: <15,000> gal

25-YEAR 24-HOUR STORM VOLUME\*:

2.65 in/12 in/ft x 49.583 ft L x 18.5 ft W x 7.48 gal/  $ft^3 = <1,515>$  gal

#### TANK DISPLACEMENT:

 $(\pi r^2 H) \times (7.48 \text{ gal/ft}^3) = \text{displacement (gals)}$ 

 $r ext{ (Tank Radius)} = 5.25 ext{ ft}$ H (Dike Height) = 2.875 ft

 $\pi(5.25 \text{ ft})^2 \times 2.875 \text{ ft } \times (7.48 \text{ gal/ft}^3)$  = <1,861> gal

CONCRETE PAD DISPLACEMENT: H x L x W x 7.48 gal/ft<sup>3</sup>

 $0.166 \text{ ft H x } 43.583 \text{ ft L x } 12.5 \text{ ft W x } 7.48 \text{ gal/ft}^3 = <679 > \text{gal}$ 

# ANCILLARY EQUIPMENT DISPLACEMENT:

 $(\pi r^2 H \text{ or } L) \times (7.48 \text{ gal/ft}^3)$ 

Pump:  $\pi(0.375 \text{ ft})^2 \text{ x } 1.666 \text{ ft x } 7.48 \text{ gal/ft}^3 = <5.5 > \text{gal}$ 2 inch Pipe:  $\pi(0.094 \text{ ft})^2 \text{ x } 25 \text{ ft x } 7.48 \text{ gal/ft}^3 = <5.2 > \text{gal}$ 4 inch Pipe:  $\pi(0.146 \text{ ft})^2 \text{ x } 57 \text{ ft x } 7.48 \text{ gal/ft}^3 = <28.5 > \text{gal}$ 6 inch Pipe:  $\pi(0.26 \text{ ft})^2 \text{ x } 29.4 \text{ ft x } 7.48 \text{ gal/ft}^3 = <46.7 > \text{gal}$ 

Total Required Capacity <19,141> gal

EXCESS CAPACITY: 19,746 - 19,141 = 605 gal

# 8.C. TANK EVALUATION AND REPAIR PLAN

8.C.I. The wastes to be stored in the hazardous waste tank at the Facility are petroleum and aqueous-based parts cleaning solvents, which are compatible with the carbon steel structure. If corrosion is noted, the waste shall be removed and the tank repaired. If corrosion is significant and localized, the tank shall be immediately taken out of service and repaired, (e.g., a patch welded over the corroded area). Should the corrosion of the vessel be extensive or irreparable, the vessel shall be immediately taken out of service and replaced. In the case of a tank that leaks outside of the dike, the service center's Contingency Plan shall be implemented.

<sup>\*</sup>Any rainwater that collects in the dike shall be pumped to the used solvent storage tank

Insert -

- -12K & 15K Gal 10'6" Vertical Tank Fabrication Details
- -Tank Skid
- -Used Solvent Storage Tank Installation Details
- -High Level Alarm System Installation Details
- -High Level Alarm System Installation Information
- -Drum Washer Assembly
- -Drum Washer Screens & Filters
- -Typical Concrete Construction Details

#### **MODULE I**

#### STANDARD CONDITIONS

#### I.A. EFFECT OF PERMIT

- I.A.1. The Permittee is allowed to store hazardous waste in containers and a tank system in accordance with the conditions of this permit. Any storage, treatment or disposal of hazardous waste not authorized in this permit or other permits is prohibited.
- I.A.2. Compliance with this permit constitutes compliance, for purposes of enforcement, with the Utah Hazardous Waste Management Rules, except for those requirements not included in this permit which become effective by statute or as promulgated by rule. are promulgated under R315 13, or are promulgated under R315 7 26, R315 7 27, or R315 7 30. Specifically, compliance with this permit during its term constitutes compliance, for purposes of enforcement, with R315 8 R315-264 only for those management practices specifically authorized by this permit. The Permittee is also required to comply with R315 1, 2, 3, 4, 5, 6, 9, 12, 13, 14, 16, 50, R315-124, R315-260, R315-261, R315-262, R315-263, R315-266, R315-268, R315-270, R315-273, and R315-101 as applicable.
- I.A.3. Attachments incorporated by reference are enforceable conditions of this permit, as are documents incorporated by reference in the attachments. Language in the modules of this permit supersedes any conflicting language in the attachments or documents incorporated into the attachments.
- I.A.4. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Sections 3008, 3013, or 7003 of RCRA; Sections 106, 104, or 107 of CERCLA; or any other law providing for protection of human health or the environment, except as provided for in Condition I.A.2.
- I.A.5. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulation.

#### I.B. ENFORCEABILITY

I.B.1. Violations duly documented through the enforcement process pursuant to Utah Code Annotated 19-6-112, may result in penalties assessed in accordance with R315-102.

#### I.C. NO WAIVER OF AUTHORITY

I.C.1. The Director expressly reserves any right of entry provided by law and any authority to order or perform emergency or other response activities as authorized by law.

#### I.D. PERMIT ACTIONS

- I.D.1. This permit may be modified, revoked and reissued, or terminated for cause, as specified in R315-270-41R315-3-4.2. and R315-3-4.4R315-270-43. If the Director determines that cause exists to modify, revoke and reissue, or terminate this permit, the action will precede in accordance with R315-4-1.5R315-124-5.
- I.D.2. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or the notification of planned changes, or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.
- I.D.3. This permit may be modified at the request of the Permittee in accordance with the procedures of R315 3 4.3R315-270-42. All modification requests involving design drawings, calculations, sketches, etc., shall be reviewed and stamped by a qualified Utah-registered professional engineer. All relevant drawings, calculations, sketches, etc., shall be included with the modification request.
- I.D.4. If a conflict exists between conditions within this permit, the most stringent condition, as determined by the Director, shall be met.

#### I.E. SEVERABILITY

I.E.1. The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. Invalidation of any state or federal statutory or regulatory provision, which forms the basis for any condition of this permit, does not affect the validity of any other state or federal statutory or regulatory basis for said condition.

#### I.F. DUTY TO COMPLY

I.F.1. The Permittee shall comply with all conditions of this permit, except that the Permittee need not comply with the conditions of this permit to the extent and for the duration any noncompliance is authorized in an emergency permit issued in accordance with R315 3-6.2R315-270-61. Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of the Utah Solid and Hazardous Waste Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

#### I.G. <u>PERMIT EXPIRATION</u>

- I.G.1. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee shall apply for and obtain a new permit, subject to Condition I.G.2.
- I.G.2. This permit will expire ten years from the date of issuance. This permit and all conditions herein shall continue in force until the effective date of a new permit, if the Permittee has submitted a timely (at least 180 days prior to permit expiration or by an alternate date if requested by the Director) and complete application under R315 3 2.5 and the applicable requirements of R315 3 2.6 through R315 3 2.19, and through no fault of the Permittee, the Director does not issue a new permit under R315 4 1.15 with an effective date on or before the expiration date of this permit. A permit continued under this condition is fully effective and enforceable.

#### I.H. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

I.H.1. It shall not be a defense, for the Permittee in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

# I.I. DUTY TO MITIGATE

I.I.1. In the event of noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

#### I.J. PROPER OPERATION AND MAINTENANCE

I.J.1. The Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment and control, and related appurtenances, which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

#### I.K. DUTY TO PROVIDE INFORMATION

I.K.1. The Permittee shall furnish to the Director within a reasonable amount of time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Director upon request, copies of records required to be kept by this permit.

#### I.L. <u>INSPECTION AND ENTRY</u>

- IL.1. Pursuant to R315 2 12R315-260-5, the Permittee shall allow the Director or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:
- I.L.1.a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- I.L.1.b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- I.L.1.c. Inspect at reasonable times any facilities, equipment, including monitoring and control equipment, practices, or operations regulated or required under this permit;
- I.L.1.d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Utah Solid and Hazardous Waste Act, any substances or parameters at any location; and
- I.L.1.e. Make record of inspections by photographic, magnetic, electronic, or any other reasonable means.

#### I.M. MONITORING AND RECORDS

- I.M.1. The Permittee shall retain at the Pioneer Road Facility, records of all monitoring information, including all calibration and maintenance records and, where applicable, all original strip chart recordings (or equivalent records) for continuous monitoring instrumentation, copies of all reports and records required by this permit, the waste minimization certification required by R315 8 5.3R315-264-73, and records of all data used to complete the application for this permit, for a period of at least three years, unless specified elsewhere in this permit, from the date of the sample, measurement, report, record, certification, or application. This period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility.
- I.M.2. All records required to be maintained under this permit may be converted to retrievable electronic media, or micro-film/fiche, for storage, in lieu of paper. However, all records shall be available for review at the facility at all times by regulatory personnel. Copies of all records shall also be made available in a format requested by regulatory personnel.
- I.M.3. Records of monitoring information shall specify at a minimum:

- I.M.3.a. The date, exact place, and times of sampling or measurements;
- I.M.3.b. The names(s), title(s), and affiliation of individual(s) who performed the sampling or measurements;
- I.M.3.c. The date(s) analyses were performed;
- I.M.3.d. The individual(s) who performed the analyses;
- I.M.3.e. The analytical techniques or methods used; and
- I.M.3.f. The results of such analyses including all  $\frac{\partial Q}{\partial A}$  data.
- I.M.4. Samples and measurements taken for the purpose of monitoring to demonstrate compliance with this permit shall be accurate and representative of the monitored activity.
- I.M.5. The Permittee shall maintain at the facility a current copy of this permit.

# I.N. CONSTRUCTION CERTIFICATION

- I.N.1. For a new hazardous waste management unit, and for a hazardous waste management unit being modified, the Permittee may not treat, store, or dispose of hazardous waste in the new or modified portion of the unit except as provided in R315 3 4.3R315-270-42, until:
- I.N.1.a. The Permittee has submitted to the Director:
- I.N.1.a.i. A letter signed by the Permittee and a qualified Utah registered professional engineer stating that unit(s) has been constructed or modified in compliance with this permit (i.e., in accordance with the approved design) and is operationally ready; and
- I.N.1.a.ii. Where applicable, stamped as-built engineering plans and specifications with any deviations from the approved design noted and justification for each deviation provided; and
- I.N.1.b. The Director has reviewed and inspected the modified or newly constructed unit(s) and has notified the Permittee in writing that the unit(s) was found to be in compliance with the conditions of this permit; or
- I.N.1.c. The Director has either waived the inspection, or has not, within 15 calendar days of the date of receipt of the above submission, notified the Permittee of intent to inspect.

#### I.O. TRANSFER OF PERMIT

I.O.1. This permit is not transferable to any person except after notice to the Director and in accordance with R315 3 4.1R315-270-40.

#### I.P. REPORTING REQUIREMENTS

- I.P.1. The Permittee shall orally report to the Director any noncompliance or other incident at the facility which may endanger human health or the environment. Any such information shall be reported as soon as possible, but not later than 24 hours from the time the Permittee becomes aware of the noncompliance or incident. The oral report shall include at a minimum the following:
- I.P.1.a. Information concerning the release of any hazardous waste which may endanger public drinking water supplies;
- I.P.1.b. Any information concerning a release or discharge of a hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility; and
- I.P.1.c. A description of the incident and its cause including:
- I.P.1.c.i. Name, title, and telephone number of person reporting the incident;
- I.P.1.c.ii. Name, address, and telephone number of the owner or operator;
- I.P.1.c.iii. Name, address, and telephone number of the facility;
- I.P.1.c.iv. Date, time, and type of incident;
- I.P.1.c.v. Location and cause (if known) of incident;
- I.P.1.c.vi. Name and quantity of materials involved;
- I.P.1.c.vii. The extent of injuries, if any;
- I.P.1.c.viii. An assessment of actual or potential hazards to the environment and human health, outside the facility, when this is applicable; and
- I.P.1.c.ix. Estimated quantity and disposition of recovered material that resulted from the incident.
- I.P.2. A written submission following the oral report required in Condition I.P.1. shall be provided within five days of the time the Permittee becomes aware of the incident or circumstances requiring reporting under Condition I.P.1. The written submission shall contain a description of the incident/noncompliance and its cause; the period of the incident/noncompliance including exact dates and times, and if the incident is noncompliance and has not been corrected, the anticipated time it is expected to

continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the incident/noncompliance.

- I.P.3. The Permittee shall comply with the spill response, clean-up and reporting requirements contained in R315 9R315-263.
- I.P.4. The Permittee shall report in writing to the Director, all instances of noncompliance within seven days from the time the Permittee becomes aware of the noncompliance. Reporting shall not excuse any noncompliance.
- I.P.5. If a significant discrepancy in a manifest of a load of waste arriving at the facility is discovered, the Permittee shall attempt to reconcile the discrepancy. If not resolved within 15 days, the Permittee shall immediately submit to the Director, a copy of the manifest and a written manifest discrepancy report describing the discrepancy and attempts to reconcile it. Significant discrepancies in quantity are: for batch waste (containerized loads), any variation in piece count, such as a discrepancy of one drum in a truckload, and for bulk waste, variations greater than ten percent in weight. Significant discrepancies in type are obvious differences that can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper.
- I.P.6. If the facility receives a load of hazardous waste without an accompanying manifest, the Permittee shall submit to the Director an unmanifested waste report within 15 days of receipt of the unmanifested waste. The report shall identify the generator of the waste and provide details regarding the type, quantity, and disposition of the waste.
- I.P.7. The Permittee shall comply with the biennial report requirements contained in R315-8-5.6R315-264-75. The biennial report shall be submitted to the Director by March 1 during each even numbered year.
- I.P.8. Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application, or in any report submitted to the Director, the Permittee shall submit such facts or corrected information within seven days of becoming aware of the error.
- I.P.9. The Permittee shall orally notify the Director within 24 hours of detection of a leak or spill from a tank system or a tank secondary containment system to the environment. This requirement is waived if the quantity of hazardous waste leaked or spilled is less than or equal to one pound and it is immediately contained and cleaned up.
- I.P.10. Within 30 days of detecting a release to the environment from a tank system or a tank secondary containment system, the Permittee shall submit the following information to the Director:
- I.P.10.a. Likely route of migration of the release;

- I.P.10.b. Characteristics of the surrounding soil (including soil composition, geology, hydrogeology and climate);
- I.P.10.c. Results of any monitoring or sampling conducted in connection with the release. If sampling or monitoring data relating to the release are not available within 30 days, these data must be submitted to the Director as soon as they become available;
- I.P.10.d. Proximity to downgradient drinking water, surface water, and populated areas; and
- I.P.10.e. Description of response actions taken or planned.

#### I.Q. <u>SIGNATORY REQUIREMENT</u>

I.Q.1. All applications, reports, notifications, or other information requested by or submitted to the Director shall be signed and certified in accordance with R315 3 2.2R315-270-11.

#### I.R. REPORTS, NOTIFICATIONS, AND SUBMISSIONS

I.R.1. All reports, notifications, or other submissions that are required by this permit to be transmitted to the Director shall be sent by certified mail or other means of proof of delivery to:

Director

Division of Solid and Hazardous-Waste Management and Radiation Control P.O. Box 144880

Salt Lake City, Utah 84114-4880

- I.R.2. All hand delivered submissions shall be made during normal business hours at the Division of Solid and Hazardous-Waste Management and Radiation Control, MASOB, 2<sup>nd</sup> Floor, 195 North 1950 West, Salt Lake City, Utah.
- I.R.3. Required oral notifications shall only be provided to the Director, an Environmental Manager, an Environmental Scientist, or an Engineer at the Division of Solid and Hazardous-Waste Management and Radiation Control, (801) 536-0200, or if none of these individuals are available, to the Department of Environmental Quality's 24-hour answering service telephone number, (801) 536-4123.

# I.S. <u>CONFIDENTIAL INFORMATION</u>

I.S.1. The Permittee may claim confidential any information required to be submitted by this permit in accordance with Utah Code Annotated, 63-2-101 et seq and 19-1-306.

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#### I.T. CORRECTIVE ACTION

- IT.1. The Permittee shall comply with R315 8 6.12 R315-264-101, which requires a permit to address corrective action for releases of hazardous waste, including hazardous constituents, from any solid waste management unit at the facility, regardless of when the waste was placed in the unit.
- I.T.2. If corrective action becomes necessary at a future solid waste management unit at the facility, the Director shall issue a schedule of compliance to the Permittee or initiate a permit modification in accordance with Condition I.D.1.

# I.U. <u>DEFINITIONS</u>

I.U.1. For purposes of this permit, terms used herein shall have the same meaning as in R315-260 through 270 or 40 CFR 260 270, with definitions in R315 controlling, unless this permit specifically provides otherwise; where terms are not defined in the regulations or the permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

"Director" means the director of the Division of Solid and Hazardous Waste Management and Radiation Control, Utah Department of Environmental Quality.

"Qualified Utah Registered Professional Engineer" means any individual who is practicing in one's the individual's area of expertise and is licensed as a Professional Engineer by the Utah Department of Commerce.

"Receive, Receives, or Received" means the point in time when an incoming load of waste enters the fenced portion of the facility.

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

"Solid Waste Management Unit" means any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at the facility at which solid wastes have been routinely and systematically released.

"Submit or Submission" means to be received and logged in at the offices of the Utah Division of Solid and Hazardous-Waste Management and Radiation Control, having been hand delivered or delivered by certified mail, mail, express mail, facsimile, electronic mail, or computer diskette. The postmark or equivalent

evidence shall be used as the date of submission. When a submission due date falls on a Saturday, Sunday or a Utah or federal holiday, the submission or report is due on the next business day.

Provisions of the Utah Solid and Hazardous Waste Act are cited as Utah Code Annotated, 19-6-xxx.

Provisions of the Utah Hazardous Waste Management Rules are cited as Utah Administrative Code, R315- $\underline{x}xx$ -xxx.

#### **MODULE II**

#### GENERAL FACILITY CONDITIONS

# II.A. DESIGN AND OPERATION OF FACILITY

- II.A.1. The Permittee shall maintain and operate the container storage areas and the tank system in a manner that minimizes the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water that could threaten human health or the environment. Should any of these incidents occur, the Permittee shall investigate and determine the cause of the incident and implement corrective measures to prevent future occurrences. The Director may consider appropriate enforcement action, to include the cessation of waste management activities, until adequate resolution of the problem occurs.
- II.A.2. Any equipment not associated with hazardous waste storage, but which could impact the environment surrounding and adjacent to the hazardous waste management units, shall be in good operating condition to prevent leakage of material onto the ground.

  This may include, but is not limited to, valves, piping, hoses, hose connections, pumps, etc.

# II.B. OFF-SITE WASTE RECEIPT NOTICE

II.B.1. When the Permittee is to receive hazardous waste from an off-site source, prior to the waste being shipped by the generator, the Permittee shall inform the generator in writing that the Safety-Kleen Pioneer Road facility has the appropriate permits for, and will accept, the waste the generator is planning on shipping. The Permittee shall keep a copy of this written notice as part of the operating record required by Condition II.ML.1.

#### II.C. PERMITTED AND PROHIBITED WASTE

- II.C.1. The Permittee may accept for management at the facility, subject to the conditions of this permit, wastes identified by the following waste codes: D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, and F005.
- II.C.2. The Permittee may also accept for management at the facility, subject to the conditions of this permit, used oil and other, non-hazardous industrial wastes.
- II.C.3. The following shall not be accepted for management at the facility at any time, regardless of the waste codes identified in Condition II.C.1.:

- II.C.3.a. Water reactive wastes or materials, defined as DOT Division 4.3, and in-R315-2- $\frac{9(f)(1)(ii)-(iv)}{R315-261-23(a)(2)-(4)}$ ;
- II.C.3.b. Pyrophoric wastes or materials, defined as DOT Division 4.2(1);
- II.C.3.c. Explosive wastes or materials, defined as DOT Forbidden, DOT Division 1.1, 1.2, and 1.3 explosives, DOT Division 4.1 Type A and Type B materials, and in-R315-2-9(f)(1)(vi) (viii)R315-261-23(a)(6)-(8);
- II.C.3.d. Shock sensitive wastes or materials;
- II.C.3.e. Radioactive wastes or materials;
- II.C.3.f. Wastes or materials exhibiting the property identified in R315 2 9(f)(1)(i)R315 261 23(a)(1);
- II.C.3.g. Wastes or materials meeting the definition of infectious as outlined in Utah Code Annotated 19-6-102(1213);
- II.C.3.h. Compressed gas cylinders or aerosol cans; and
- II.C.3.i. Any waste carrying a State of Utah or EPA waste code not identified in Condition II.C.1.

# II.D. GENERAL WASTE ANALYSIS

- II.D.1. The Permittee shall comply with the conditions and procedures found in ATTACHMENT 1.
- II.D.2. The Permittee shall measure the specific gravity of immersion cleaner/parts washer solvent from all customers who are large quantity generators, at least once each calendar quarter. The Permittee shall measure the specific gravity of immersion cleaner/parts washer solvent from all customers who are small quantity generators at least once per calendar year and the Permittee shall measure the specific gravity of immersion cleaner/parts washer solvent from 10% of all customers serviced during a calendar year who are conditionally exempt small quantity generators. Required specific gravity testing shall occur at the time the Permittee's driver picks up the waste from the customer with all containers of immersion cleaner/parts washer solvent being measured. The Permittee shall document and record the results of specific gravity testing in the facility operating record.
- II.D.2.a. Parts washer solvent with a specific gravity less than 0.75 or greater than 0.85 shall not be accepted. Immersion cleaner with a specific gravity less than 0.90 or greater than 1.10 shall not be accepted. Branch management shall recheck the specific gravity measurements of at least five percent of the total measurements. Results of specific gravity rechecks shall be documented and maintained in the facility operating record.

- ILD.32. The Permittee's drivers shall use an inspection checklist to document the following information for each container serviced:
- II.D.32.a. The driver's name, the date, the name of the customer and the pick-up location, the type of waste, the size (volume) of each container serviced, the initial volume of product delivered, and specific results of the driver's inspection of the waste color and volume for each container serviced;
- II.D.32.b. Problems observed with containers, basis for rejection, and justification for acceptance despite deficiencies in a column dedicated for "remarks;" and
- II.D.3.c. The results of the hydrometer measurement for specific gravity as specified in Condition II.D.2., if applicable.
- The Branch Manager or the Branch Manager's designee shall review for accuracy the driver's data, enter the date of such review, and sign each inspection log within seven working days of the waste arriving at the branch. Safety-Kleen shall investigate any deficiencies discovered as a result of such review and document actions taken to prevent the reoccurrence of the discovered deficiencies or actions taken to rectify the discovered deficiencies.
- II.D.54. The Permittee shall analyze each waste stream managed at the facility through chemical analysis of representative samples as specified in Table 2 Attachment 1 once a year to verify Specific Waste Codes and Underlying Hazardous Constituents as part of the facility's ongoing quality assurance program.
- This annual sampling and analysis shall be in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846 or equivalent methods approved by the Director. The samples shall be collected at the Permittee's facility during the month of April, and the analytical results shall be submitted to the Director by July 1<sup>st</sup> of each year respectively. Any inconsistencies between the analytical results, hazardous waste determinations and associated facility manifests shall be addressed in a report accompanying the analytical results. Waste codes may be excluded from manifests if the analytical results conclusively demonstrate that waste constituents did not exceed TCLP regulatory levels (i.e., a waste code may be excluded if the concentration detected is below the TCLP regulatory level for that specific constituent or if not detected, the detection limit is below the TCLP regulatory level for that specific constituent).
- II.D.54.b. The most conservative set of waste codes, indicated by the analytical results obtained from either the Salt Lake Service Center (Pioneer Road facility) or Safety Kleen's National Annual Re-characterization, shall be used on manifests for the year following each analytical report.
- II.D.54.c. The Permittee shall provide oral and written notification to the Director of each sampling date and time at least seven days prior to sampling. The Permittee shall

reschedule in writing, prior to April each year, any sampling that cannot be conducted in accordance with the above schedule.

- II.D.65. At a minimum, the Permittee shall:
- II.D.65.a. Maintain properly functioning instruments; and
- II.D.65.b. Use approved sampling and analytical methods.
- II.D.76. If the Permittee uses a <u>Safety-Kleen or</u> contract laboratory to perform analyses, the laboratory shall be certified by the State of Utah <u>in accordance with R444-14</u> to perform the <del>contracted</del> analyses. For parameters for which certification is unavailable, the laboratory shall provide quality control/quality assurance data sufficient to assess the validity of the data. The Permittee shall inform the laboratory in writing that it must operate under the Waste Analysis Plan conditions set forth in this permit.
- II.D.87. The Permittee shall obtain, independent of the Service Agreement, a certification, signed by each customer at the time of servicing parts washers which attests that the customer has operated the part washer in accordance with the Permittee's operating specifications and that the customer will notify the Permittee if the operation or process generating the hazardous waste has changed. In addition, the certification shall attest that the customer has not mixed the solvent provided the customer is sending to the facility with other materials, or introduced into the solvent provided, any substance which contains any constituents which can be regulated as hazardous waste or which contains polychlorinated biphenyls, and that the customer has not altered the characteristics or compounds of the solvent provided.

# II.E. <u>SECURITY</u>

- II.E.1. The Permittee shall comply with security conditions and procedures found in ATTACHMENT 3.
- II.E.2. Vehicles containing hazardous waste shall be secured in the facility by a locked gate if parked overnight prior to unloading.

# II.F. GENERAL INSPECTION REQUIREMENTS

- II.F.1 The Permittee shall comply with the inspection requirements found in ATTACHMENT 5.
- II.F.2. Records of inspections shall be kept for at least three years and in accordance with R315-8-2.6(d)R315-264-15(d).
- II.F.3. The Permittee shall make any repairs, or take other remedial action, on a time schedule that ensures that any deterioration or malfunction discovered does not lead to an

environmental or human health hazard. If the remedy requires more than 72 hours from the time that the problem is discovered, the Permittee shall submit in writing to the Director, before the expiration of the 72-hour period, a proposed time schedule for correcting the problem. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

# II.G. <u>PERSONNEL TRAINING</u>

- II.G.1. The Permittee shall comply with the personnel training procedures found in ATTACHMENT 4.
- II.G.2. Facility personnel working with or around hazardous waste shall complete the required personnel training within six months after their hire date, assignment to the facility, or assignment to a new position at the facility.
- II.G.3. Facility personnel shall take part in an annual review of their initial training in both contingency procedures and hazardous waste management procedures relevant to the positions in which they are employed.
- II.G.4. The Permittee shall maintain training documents and records in accordance with R315-8-2.7(d) R315-264-16(d) and R315-8-2.7(e)R315-264-16(e).

# II.H. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

II.H.l. The Permittee shall comply with the requirements of R315-8-2.8. R315-264-17 and the requirements of all applicable National Fire Protection Association (NFPA) codes.

# II.I. PREPAREDNESS AND PREVENTION

- II.I.1. The Permittee shall follow the procedures found in ATTACHMENT 3 and maintain at the facility the emergency equipment and systems identified in ATTACHMENT 3 and required by R315-8-3.3R315-264-32.
- II.I.2. All facility communications or alarm systems, fire protection equipment, safety equipment, discharge control equipment, and decontamination equipment shall be tested as appropriate and maintained as necessary to assure its proper operation in time of emergency.
- II.I.3. The Permittee shall maintain access to the communications or alarm system as required by R315-8-3.5R315-264-34.
- II.I.4. The Permittee shall attempt to make emergency plan arrangements with State and local authorities as required by R315-8-3.7R315-264-37. If state or local officials

refuse to enter into preparedness and prevention emergency response arrangements with the Permittee or the arrangements change, the Permittee shall document this refusal or change in the Operating Record. The Director shall be notified in writing within 30 days of any change to local emergency agreements.

# II.J. <u>CONTINGENCY PLAN</u>

- II.J.l. The Permittee shall immediately carry out the provisions of the Contingency <u>pPlan</u>, ATTACHMENT 2, and follow the emergency procedures described by <u>R315-8</u> 4.7<u>R315-264-56</u>, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten the environment or human health.
- II.J.2. The Permittee shall comply with the requirements of R315 8 4.4R315-264-53, by providing copies of the Contingency Plan to emergency agencies who may be called in an emergency, maintaining a copy of the Plan at the facility, and by providing a copy upon request.
- II.J.3. The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by R315-8-4.5R315-264-54.

# II.K. <u>MANIFEST SYSTEM</u>

- II.K.1. The Permittee shall comply with the manifest requirements of R315-8-5.2R315-264-71, R315-8-5.4R315-264-72, and R315-8-5.7R315-264-76.
- II.K.2. Copies of all manifests received by the Permittee and copies of manifests where the Permittee is listed as the generator shall be submitted to the Director by the 10<sup>th</sup> day of the month following the month during which the manifests were received or generated by the Permittee.

# II.L. <u>RECORDKEEPING</u>

II.L.1. The Permittee shall maintain a written Operating Record at the facility accordance with R315-8-5.3 R315-264-73 and R315-50-2R315-264-1103.

# II.M. CLOSURE

II.M.l. The Permittee shall comply with R315-8-7-R315-264-110 through 120 and close the facility in accordance with ATTACHMENT 6.

# II.N. COST ESTIMATES FOR THE FACILITY CLOSURE

- II.N.1. The facility's closure cost estimate shall be prepared and maintained in accordance with R315-8-8R315-264-140 through 151, except as provided for in Condition II.N.2. and ATTACHMMENT 6. The closure cost estimate shall also include an estimate for the reclamation of the used oil facility.
- II.N.2. By May 15<sup>th</sup> of each year, the Permittee shall adjust the closure cost estimate for inflation for the previous calendar year in accordance with the procedures contained in 40 CFR 264.142(b)R315-264-142(b) and submit a copy of that adjusted cost estimate to the Director. The Permittee shall maintain the latest adjusted closure cost estimate in the Operating Record.
- II.N.3. For each new hazardous waste management unit placed into operation, an updated closure/post\_closure cost estimate for the facility shall be prepared which includes the new unit, prior to waste being placed on or into the new unit. Whenever the current closure cost estimate increases to an amount greater than the face amount of the closure insurance, the Permittee, within 60 days after the increase, shall either cause the face amount of the policy to be increased to an amount at least equal to the current closure cost estimate and submit evidence of such increase to the Director or obtain other financial assurance as specified in-40 CRF 264.143R315-264-143.
- II.N.4 The Permittee shall revise the closure cost estimate in accordance with R513-8-8 R315-264-140 through 151 whenever there is a change in the facility's closure plan that increases the cost of closure.

# II.O. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

II.O.1 The Permittee shall demonstrate continuous compliance with the requirement to establish financial assurance for closure of the facility by obtaining and maintaining closure insurance. The closure insurance shall meet the requirements established in 40 CFR 264.143(e)R315-264-143(e) as incorporated by R315-8-8. Changes in the provider issuing the closure insurance and changes in the financial assurance mechanisms, shall be approved by the Director in accordance with the permit modification procedures contained in Condition I.D.3. The current closure insurance policy, policy number PEC000953401x, is provided by Indian Harbor Insurance Company.

# II.P. <u>LIABILITY REQUIREMENTS</u>

II.P.1. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147(a)R315-264-147(a) as incorporated by R315-8-8 by obtaining and maintaining hazardous waste liability insurance for sudden accidental occurrences in the amount of at least one million U.S. dollars per occurrence with an annual aggregate of at least two million U.S. dollars, exclusive of legal defense costs. Current liability insurance is provided by Greenwich Insurance Company Indian Harbor Insurance Company, policy number PEC0021020-xxPEC0042039xx.

- II.P.2. The Permittee shall submit to the Director a Certificate of Liability Insurance worded as required by R315 8 8R315-264-140 through 151. Each year, within 30 days prior to September 20th the Permittee shall submit to the Director, a new certificate of liability insurance worded as required by R315-8-8R315-264-140 through 151.
- II.P.3. Changes in the limits of liability provided by the policy shall require the issuance of a new Certificate of Liability Insurance. This new Certificate of Liability Insurance shall be submitted to the Director within 30 days after the effective date of the changes. Changes in liability insurance providers and liability coverage mechanisms shall be approved by the Director in accordance with the permit modification procedures contained in Condition I.D.3.

# II.Q. <u>INCAPACITY OF OWNER OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS</u>

II.Q.1. The Permittee shall comply with 40 CFR 264.148R315-264-148 as incorporated by reference into R315 8 8.

# II.R. <u>LAND DISPOSAL RESTRICTION REQUIREMENTS</u>

II.R.1. Safety-Kleen Pioneer Road shall comply with the applicable land disposal restriction requirements in R315-13R315-268.

#### **MODULE III**

#### STORAGE IN CONTAINERS

# III.A. <u>APPLICABILITY</u>

III.A.1. The requirements of this module apply to the operation of the container management areas in the warehouse and the metal storage building. The Permittee shall comply with R315-8-9R315-264-170 through 179, and all applicable requirements established in this permit when managing hazardous waste in the container management areas identified in this module.

# III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

- III.B.1. The Permittee may store the following hazardous wastes in containers at the facility subject to the terms of this permit:
- III.B.1.a. Parts Washer Waste consisting of the following: petroleum and aqueous based solvents, tank bottom sludge/sediment, and dumpster/drum washer bottoms sludge;
- III.B.1.b. Immersion Cleaner Waste;
- III.B.1.c. Dry Cleaning Waste consisting of filter cartridges, powder residue, and still byproducts;
- III.B.1.d. Paint Wastes consisting of paint, lacquer thinners, and paint/thinner contaminated materials; and
- III.B.1.e. Imaging/Photochemical Waste.
- III.B.2. The Permittee may store the hazardous wastes identified in Condition III.B.1. in containers provided the wastes are identified by one or more of the EPA hazardous waste codes in Condition II.C.1. and are not prohibited by Condition II.C.3.
- III.B.3. The Permittee may store product, non-hazardous waste, universal waste, and 10-day transfer waste in the container storage areas at the facility provided the Permittee complies with applicable DOT and fire code requirements.
- III.B.4. The Permittee shall not store in the container management areas, any waste identified in Condition II.C.3.

# III.C. <u>CONDITION OF CONTAINERS</u>

III.C.1. If a container holding hazardous waste is not in good condition (e.g., severe rusting, bulging, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container, or the container of hazardous waste itself, into a container that is in good condition or manage the waste in some other way that complies with the requirements of R315-8-9.2R315-264-171. This shall be completed as soon as possible, but no later than two hours from the time the problem was first discovered and noted in the Operating Record.

# III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

III.D.1. The Permittee shall assure that wastes in containers are compatible with the containers. Containers must be made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

# III.E. MANAGEMENT OF CONTAINERS

- III.E.1. The Permittee shall keep all containers of hazardous waste closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner that may rupture the container or cause it to leak as specified in R315-8-9.4R315-264-173.
- III.E.2. Containers of hazardous waste in storage shall not exceed a stacking height of six feet.
- III.E.3. Containers of hazardous waste in the warehouse storage area shall not be stacked more than two pallets high. All containers stored in the warehouse shall be stored on pallets.
- III.E.4. The Permittee shall not store paint wastes in the warehouse storage area.
- III.E.5. The Permittee shall mark or otherwise identify all containers stored in the permitted container storage units in a manner that clearly identifies each container's contents, including, the date placed in storage, the words "hazardous waste" if applicable, and a unique number or identification that can be cross referenced with the manifest or shipping papers accompanying the waste to the facility.
- III.E.6. For purposes of capacity evaluation, all containers stored in the hazardous waste storage areas shall be considered full to their respective capacities with hazardous waste.
- III.E.7. The Permittee shall maintain a minimum of two feet of aisle space in the container storage areas.

# III.F. CONTAINMENT SYSTEMS

- III.F.1. The secondary containment systems for the container storage areas shall provide a minimum of 10% of the capacity of the container storage area, or 100% of the volume of the largest container stored in the area, whichever is greater.
- III.F.2. The Permittee shall maintain the container storage areas and secondary containment systems in each of the container management areas as constructed and in accordance with ATTACHMENT 7. These systems shall be maintained in such a manner as to ensure that they perform in accordance with R315 8 9.6R315-264-175.

# III.G. <u>CONTAINER STORAGE AREA CAPACITY</u>

- III.G.1. At capacity, the Permittee shall store no more than the following volumes of hazardous waste:
- III.G.1.a. Warehouse Management Area 4,500 gallons.
- III.G.1.b. Metal Waste Paint Storage Building 3,300 gallons.

# III.H. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE

III.H.1 The Permittee shall locate all containers holding ignitable or reactive waste at least 50 feet from the Facility's property line as required by R315-8-9.7R315-264-176.

# III.I. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

- III.I.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container as specified in R315-8-9.8(a)R315-264-177(a).
- III.I.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material as specified in R315-8-9.8(b)R315-264-177(b).
- III.I.3 A container holding a hazardous waste that is incompatible with any waste or other materials nearby, shall be separated from the other materials or protected from them by means of a dike, berm, wall, or other device in accordance with R315 8 9.8(c)R315-264-177(c).

# III.J. CONTAINER LOCATION/TRACKING

III.J.1. The Permittee shall record, in the operating record, the location of each container in the container storage areas. The location records shall be maintained until a container is manifested off-site.

# III.K. INSPECTION SCHEDULES AND PROCEDURES

- III.K.1. The Permittee shall conduct inspections of the container storage areas as specified in ATTACHMENT 5.
- III.K.2. The container storage areas shall be inspected daily in accordance with R315 8-2.6(b)R315-264-15(b)-on any day that container loading or unloading activities occur in a respective storage area.
- III.K.3. If a problem is observed during the inspections required under this permit, the Permittee shall correct the problem as specified in R315-8-2.6(e) R315-264-15(c) and ATTACHMENT 5.
- III.K.4. Container management areas sumps shall be inspected in accordance with ATTACHMENT 5 for the presence of liquids. If liquids are discovered in the sumps, the Permittee shall document the location of the release in the inspection log. Any liquids discovered shall be removed and managed as soon as possible but not later than 24 hours following discovery.

# III.L. ORGANIC AIR EMISSION STANDARDS

- III.L.1. The Permittee shall control air emissions from each of the containers of hazardous waste stored in the container storage units in accordance with the applicable provisions of R315-8-22-R315-264-1080 through 1090(specifically 40 CFR 264.1082 and 264.1086).
- III.L.2. The requirements contained in Condition III.L. do not apply to a container that has a design capacity less than or equal to 0.1 m<sup>3</sup> (about 26 gallons).
- III.L.3. A container is exempt from the standards specified in this condition provided that the container is one of the following:
- III.L.3.a. A container for which all hazardous waste in the container has an average volatile organic (VO) concentration at the point of waste origination of less than 500 parts per million by weight (ppmw). The average VO concentration shall be determined using the procedures specified in R315-8-22 R315-264-1080 through 1090 (specifically-40 CFR 264.1083(a)R315-264-1083). The Permittee shall review and update, as necessary, this VO determination at least once every 12 months following the date of the initial determination for each type of waste managed in containers at the facility. The initial review shall be conducted within 30 days of the effective date of this Permit. The reviews and supporting data shall be documented in the Operating Record.

- III.L.3.b. A container for which the organic content of all hazardous waste in the container has been reduced by an organic destruction method or removal process that achieves any one of the conditions contained in R315-8-22 R315-264-1080 through 1090 (specifically-40 CFR 264.1082(e)(2)R315-264-1082(e)(2)). For these wastes, the necessary determinations to demonstrate organic destruction or removal shall be made using the applicable procedures specified in R315-8-22 R315-264-1080 through 1090 (specifically-40 CFR 264.1083(b)R315-264-1083(b)).
- III.L.3.c. A container for which all hazardous waste in the container either: meets the numerical concentration limits for organic constituents, applicable to the hazardous waste, as specified in R315-13-1-R315-268 (LDR Treatment Standards), or the organic hazardous constituents in the waste have been treated by the treatment technology established by the EPA for the waste in R315-13-1-R315-268 (LDR Treatment Technology Standards), or have been removed or destroyed by an equivalent method of treatment approved by the Director pursuant to R315-13-1-R315-268.
- III.L.4. The Director may at any time perform or request that the Permittee perform an average VO concentration determination of a hazardous waste managed in a container exempted from using air emission controls under the provisions of R315-8-22-R315-264-1080 through 1090 (specifically 40 CFR 264.1082(d)R315-264-1082(d)).
- III.L.5. For containers of hazardous waste in the container storage units having a design capacity greater than 0.1 m<sup>3</sup> (about 26 gallons) and less than or equal to 0.46 m<sup>3</sup> (about 119 gallons), the Permittee shall control air pollutant emissions from the containers in accordance with Level 1 standards.
- III.L.5.a. Containers using Level 1 controls shall be one of the following:
- III.L.5.a.i. A container that meets the applicable U.S. DOT regulations on packaging hazardous materials for transportation as specified in 40 CFR 264.1086(f)R315-264-1086(f).
- III.L.5.a.ii. A container that is equipped with a cover and closure devices that form a continuous barrier over the container openings such that when the cover and closure devices are secured in the closed position, there are no visible holes, gaps, or other open spaces into the interior of the container. The cover may be a separate cover installed on the container, or may be an integral part of the container structural design.
- III.L.5.a.iii. An open-top container in which an organic-vapor suppressing barrier is placed on or over the hazardous waste in the container such that no hazardous waste is exposed to the atmosphere.
- III.L.5.b. A container complying with Level 1 controls shall be equipped with covers and closure devices, as applicable to the container, that are composed of suitable

materials to minimize exposure of the hazardous waste to the atmosphere, and to maintain the equipment integrity for as long as the container is in service.

- III.L.5.c. Whenever a hazardous waste is in a container using Level 1 controls, the Permittee shall install all covers and closure devices for the container, as applicable to the container, and secure and maintain each closure device in the closed position, except as follows:
- III.L.5.c.i. Opening of a closure device or cover is allowed for the purpose of adding hazardous waste or other material as follows:
- III.L.5.c.i.A. When filling the container to the intended final level in one continuous operation, the Permittee shall promptly secure the closure devices in the closed position and install the covers, as applicable to the container, upon conclusion of the filling operation.
- III.L.5.c.i.B. When filling the container with discrete quantities or batches of material intermittently over a period of time, the Permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon either the container being filled to the intended final level; the completion of a batch loading after which no additional material will be added to the container within 15 minutes; the person performing the loading operation leaving the immediate vicinity of the container; or the shutdown of the process generating the material being added to the container, whichever condition occurs first.
- III.L.5.c.ii. Opening of a closure device or cover is allowed for the purpose of removing hazardous waste from the container as follows:
- III.L.5.c.ii.A. Opening of the closure device or cover shall be allowed at any time if the container is empty as defined in R315-2-7R315-261-7.
- III.L.5.c.ii.B. If discrete quantities or batches of material are removed from the container but the container does not meet the definition of an empty container, the Permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes, or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.
- III.L.5.c.iii. Opening of a cover or closure device is allowed when access inside the container is needed to perform routine activities other than transfer of hazardous waste.Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable to the container.
- III.L.5.c.iv. Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device that vents to the atmosphere, is allowed during normal operations for the purpose of maintaining the internal pressure of the

container in accordance with the design specifications. The device shall be designed to operate with no detectable organic emissions when the device is secured in the closed position.

- III.L.5.c.v. Opening of a safety device, as defined in R315-8-22-R315-264-1080 through 1090 (specifically 40 CFR 265.1081 incorporated by reference in R315-265-1), shall be allowed at any time conditions require doing so to avoid an unsafe condition.
- III.L.6. For containers of hazardous waste at the container storage units having a design capacity greater than 0.46 m³ (about 119 gallons) that are not in light material service (see definition in 40 CFR 265.1081 incorporated by reference in R315-265-1), the Permittee shall control air pollutant emissions from the containers in accordance with Level 1 standards identified in this module.
- III.L.7. For containers of hazardous waste having a design capacity greater than 0.46 m<sup>3</sup> (about 119 gallons) that are in light material service (see definition in 40 CFR 265.1081 incorporated by reference in R315-265-1), the Permittee shall control air pollutant emissions from the containers in accordance with Level 2 standards in R315-8-22 R315-264-1080 through 1090 (specifically 40 CFR 264.1086(d)R315-264-1086(d)).
- III.L.8. The Permittee shall comply with the applicable recordkeeping and reporting requirements contained in R315-8-22-R315-264-1080 through 1090 (specifically 40 CFR 264.1089R315-264-1089 and 264.1090).

#### III.M. CLOSURE

III.M.1. At closure of a container management area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in ATTACHMENT 6.

#### MODULE IV

#### STORAGE IN TANKS

#### IV.A. APPLICABILITY

IV.A.1. The requirements of this module apply to the operation of the hazardous waste (spent solvent) tank system at the facility. The tank is a vertical, aboveground tank having an operating capacity of 13,986 gallons. The Permittee shall comply with R315-8-10 R315-264-190 through 200 and all applicable requirements established in this permit when managing hazardous waste in this tank system.

#### IV.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

- IV.B.1. The Permittee may store hazardous waste, identified by one or more of the waste codes outlined below, in the hazardous waste tank at the facility, provided the waste is not prohibited by Condition II.C.3:
- IV.B.1.a. D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D021, D027, D028, D035, D039, and D040.
- IV.B.2. Hazardous waste identified by waste codes other than those above shall not be placed in the hazardous waste tank system at the facility.
- IV.B.3. The Permittee shall not place hazardous waste in a tank other than the hazardous waste tank identified by this permit.

#### IV.C. SECONDARY CONTAINMENT AND INTEGRITY ASSESSMENTS

- IV.C.1. For the existing tank system, the Permittee shall keep on file at the facility, a written assessment, reviewed and certified by an independent, qualified Utah registered professional engineer that attests to the tank system's integrity. This assessment shall determine that the tank system is adequately designed and has sufficient structural strength and compatibility with the wastes being stored to ensure that it will not collapse, rupture, or fail.
- IV.C.2. The Permittee shall maintain the tank system (including ancillary equipment and secondary containment) as constructed and in accordance with ATTACHMENT 8 and maintain this system in such a manner as to ensure that it performs in accordance with R315-8-10-R315-264-190 through 200 (specifically-40 CFR 264.193R315-264-193).

# IV.D. <u>NEW AND REPLACEMENT TANK SYSTEMS OR COMPONENTS</u>

IV.D.1. The Permittee shall comply with Condition I.D.3. when requesting additional, or replacement tank systems, components, or ancillary equipment.

#### IV.E. GENERAL OPERATING REQUIREMENTS

- IV.E.1. The Permittee shall mark and maintain on the tank designated for hazardous waste storage, the words "HAZARDOUS WASTE" in lettering at least four inches in height and in a color to contrast with the tank.
- IV.E.2. The Permittee shall not place hazardous wastes or other materials in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail.
- IV.E.3. The Permittee shall use appropriate controls and practices to prevent spills and overflows from the tank or containment system.
- IV.E.4. The Permittee shall cease operating the tank system in the event of an equipment failure, power supply failure or if the tank is found unfit for use as a result of the annual interior inspection.
- IV.E.5. The Permittee shall maintain the tank system (including ancillary equipment and secondary containment) in good repair. Routine maintenance shall be performed at sufficient frequency to ensure that the tank system remains in good repair.
   Malfunctions and deterioration shall be corrected as expeditiously as possible.
- IV.E.6. The tank system shall be designed, constructed, maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden discharge of hazardous waste or hazardous waste constituents to the air, soil, groundwater, or surface water which could threaten human health or the environment.
- The Permittee shall empty the facility tank system, visually inspect the general condition of the facility tank system, and measure the corrosion of the tank system at least once each year and certify that it can safely store the hazardous waste authorized by this permit to be managed in the tank. These inspections and tests shall be certified by an independent, qualified Utah registered professional engineer.
- IV.E.8. The Permittee shall maintain the level of hazardous waste in the tank system at or below 13,986 gallons.
- IV.E.9. The Permittee shall equip the tank system with and maintain a high-level alarm system in accordance with the drawings and specifications in ATTACHMENT 8.
- IV.E.10. Hazardous waste or other material may be placed in the tank system only if the waste or material is compatible with the wastes already stored in the tank, and compatible with the tank or tank system construction material.
- IV.E.11. Ignitable wastes placed in the tank system shall be managed in a manner that protects the waste from sources of ignition and the Permittee shall comply with all other applicable fire code requirements with respect to operation of the hazardous waste storage tank.

- IV.E.12. No reactive waste shall be placed in the tank system.
- IV.E.13. The tank secondary containment system shall be maintained and operated such that it remains free of both cracks and gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.
- IV.E.14. If the tank secondary containment area contains any material, it shall be emptied within 24 hours of discovering the contents. This means that all material, liquid, or solid, or both, will be removed. If ongoing precipitation prevents the emptying of all material from the secondary containment system, the secondary containment system shall be emptied within 24 hours of the end of the precipitation event. However, enough material shall be removed during the event to maintain sufficient containment capacity in the system. If ice from precipitation forms in the tank system secondary containment, and removal within 24 hours of discovery poses a significant risk of causing damage to the secondary containment, the Permittee may leave the ice in place until it melts without being subject to the precipitation removal requirements of this condition. Precipitation in the form of ice in the tank secondary containment shall be removed the same business day as melting occurs.
- IV.E.15. The tank system secondary containment shall provide containment for at least 100% of the volume of the hazardous waste storage tank.

#### IV.F. RESPONSE TO LEAKS OR SPILLS

- IV.F.1. In the event of a leak or a spill from the tank system, from the secondary containment system. If there is a leak or spill from the tank system or the secondary containment system, or if either system becomes unfit for continued use, the Permittee shall remove the affected system from service immediately and complete the following actions:
- IV.F.1.a. Immediately stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release;
- IV.F.1.b. Remove waste and accumulated precipitation from the tank system, and/or-the secondary containment system, or both within 24 hours of detection of the leak or spill to prevent further release and allow for inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall orally notify the Director and request additional time;
- IV.F.1.c. Immediately conduct a visual inspection of the release, and based upon that inspection: prevent further migration of the leak or spill to soils or surface water and remove and properly manage any visible contamination of the soil or surface water; and
- IV.F.1.d. Unless the release is one pound or less and immediately contained and cleaned up, the Permittee shall notify the Director as soon as possible, but no later than 24 hours after detection of a release from the tank system to the environment. Within 30 days of

detecting a release to the environment from the tank system, the Permittee shall submit a written report to the Director identifying details of the release including:

- IV.F.1.d.i. Likely route of migration of the release;
- IV.F.1.d.ii. Characteristics of the surrounding soil;
- IV.F.1.d.iii. Results of any monitoring or sampling conducted in connection with the release;
- IV.F.1.d.iv. Proximity to downgradient drinking water, surface water, and populated areas; and
- IV.F.1.d.v. Description of response actions taken or planned.
- IV.F.1.e. The Permittee shall close the tank system in accordance with the Closure Plan, ATTACHMENT 6, unless the following are satisfied:
- IV.F.1.e.i. For a release caused by a spill that has not damaged the integrity of the tank system, the Permittee may return the tank system to service as soon as the released waste is removed and repairs, if necessary, are made;
- IV.F.1.e.ii. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service;
- IV.F.1.e.iii. For a release to the environment caused by a leak from a component of the tank system without secondary containment, the Permittee shall provide the component of the system from which the leak occurred with secondary containment that satisfies the requirements of R315-8-10 R315-264-190 through 200 (specifically 40 CFR <del>264.193</del>R315-264-193) before it can be returned to service, unless the source of the leak is an aboveground portion of the tank system that can be inspected visually. If the source of the leak is an aboveground component that can be inspected visually, the component shall be repaired and may be returned to service without secondary containment as long as the certification requirements of Condition IV.F.1.e.iv. are satisfied. If a component is replaced to comply with the requirements of this condition, that component shall satisfy the requirements for new tank systems or components in R315 8 10 R315 - 264 - 190 through 200 (specifically 40 CFR 264 . 192 R315 - 264 - 192 and 40 CFR 264.193). Additionally, if a leak has occurred in any portion of a tank system component that is not readily accessible for visual inspection, the entire component must be provided with secondary containment in accordance with R315-8-10-R315-264-190 through 200 (specifically-40 CFR 264.193R315-264-193) prior to being returned to use.
- IV.F.1.e.iv. If the Permittee has repaired the tank system in accordance with Condition IV.F.1.e. and the repair has been extensive, the tank system must not be returned to service unless the Permittee has obtained a certification by an independent, qualified, Utah-registered, professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. The certification shall be submitted to the Director within seven days after returning the tank system to use.

IV.F.2. The Permittee shall comply with the requirements specified in the Contingency Plan, ATTACHMENT 2, in the event there is a release from the tank system that threatens human health or the environment.

#### IV.G. ORGANIC AIR EMISSION STANDARDS

- IV.G.1. The hazardous waste storage tank is not subject to the requirements in Condition IV.G. if the tank meets one or more of the exemption standards found in R315 8 22 R315-264-1080 through 1090 (specifically 40 CFR 264.1082(c) R315-264-1082(c)).
- IV.G.2. If not exempt under Condition IV.G.1., the Permittee shall control air emissions from the hazardous waste tank using Tank Level 1 controls including the following:
- IV.G.2.a. The Permittee may only store in the tank system, waste with an organic vapor pressure equal to or less than 5.2 kPa.
- IV.G.2.b. The maximum organic vapor pressure for wastes being stored in the tank shall be determined using the procedures specified in R315-8-22-R315-264-1080 through 1090 (specifically-40 CFR 264.1083(e)R315-264-1083(c)). The Permittee shall perform a new determination whenever changes to the hazardous waste managed in the tank could potentially cause the maximum organic vapor pressure to increase to a level equal to or greater than 5.2 kPa.
- IV.G.2.c. The tank shall be equipped and maintained with a fixed roof designed to meet the following requirements:
- IV.G.2.c.i. The fixed roof and its closure devices shall be an integral part of the tank and shall form a continuous barrier over the entire surface area of the hazardous waste in the tank.
- IV.G.2.c.ii. The fixed roof shall be maintained such that there are no visible cracks, holes, gaps, or other open spaces between the roof section joints or between the roof edge and the tank wall.
- IV.G.2.c.iii. Each opening in the fixed roof, and any manifold system associated with the fixed roof, shall be either equipped with a closure device designed to operate such that when the closure device is secured in the closed position there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the opening and the closure device; or connected by a closed-vent system that is vented to a control device. The control device shall be designed to remove or destroy organics in the vent stream, and shall be operating whenever hazardous waste is managed in the tank, except as provided below:
- IV.G.2.c.iii.A. During periods when it is necessary to provide access to the tank for performing the activities of Condition IV.G.2.c.iii.B., venting of the vapor headspace underneath the fixed roof to the control device is not required, opening of closure devices is

allowed, and removal of the fixed roof is allowed. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable, and resume operation of the control device.

- IV.G.2.c.iii.B. During periods of routine inspection, maintenance, or other activities needed for normal operations, or for removal of accumulated sludge or other residues from the bottom of the tank.
- IV.G.2.c.iv. The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the hazardous waste to the atmosphere, to the extent practical, and will maintain the integrity of the fixed roof and closure devices throughout their intended service life.
- IV.G.3. Whenever hazardous waste is in the tank, the fixed roof shall be installed with each closure device secured in the closed position except as follows:
- IV.G.3.a. Opening of closure devices or removal of the fixed roof is allowed at the following times:
- IV.G.3.a.i. To provide access to the tank for performing routine inspection, maintenance, or other activities needed for normal operations. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable to the tank.
- IV.G.3.a.ii. To remove accumulated sludge or other residues from the bottom of the tank.
- IV.G.3.b. Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the tank internal pressure in accordance with the tank design specifications. The device shall be designed to operate with no detectable organic emissions when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the tank internal pressure is within the internal pressure operating range determined by the Permittee based on the tank manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, ignitable or hazardous materials.
- IV.G.3.c. Opening of a safety device, as defined in R315-7 30-R315-265-1 (specifically 40 CFR 265.1081 as incorporated by reference in R315-265-1) is allowed at any time conditions require doing so to avoid an unsafe condition.
- IV.G.4. Transfer of hazardous waste to the tank or from the tank shall be conducted using continuous hard or flexible piping or another closed vent system that does not allow exposure of the hazardous waste to the atmosphere.

#### IV.H. ORGANIC AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

IV.H.1. The Permittee shall comply with the applicable requirements of R315-8-18 R315264-1050 through 1065(40 CFR 264.1050 1065), for all equipment, including each valve, pump, compressor, pressure relief device, sampling connection system, openended valve or line, or flange or other connector, and associated control devices in contact with or containing hazardous waste with an organic concentration of at least 10 percent by weight. The facility is assumed to be in heavy liquid service and the Permittee shall maintain the necessary documentation at the facility to support this assumption.

#### I. DUMPSTER/DRUM WASHER SPECIFIC CONDITIONS

- IV.I.1. Each Dumpster/Drum Washer at the Return and Fill station shall be maintained in such a manner that when the lid is closed, there are no visible cracks, holes, gaps, or other open spaces between the lid/interface of the lid edge and the sides of the Dumpster/Drum Washer.
- IV.I.2. The lid of each Dumpster/Drum Washer may be opened for the following activities:

  adding or removing waste, routine maintenance, sampling, inspection, or other
  activities needed for normal operation. Otherwise, the lid of each Dumpster/Drum
  Washer shall be maintained in the closed position.
- IV.I.3. At the end of each processing batch, each Dumpster/Drum Washer shall have standing free liquid removed from the drip/spill pan below the dumpster and to the extent practical, free liquid and sludge shall be removed from each unit by the end of each business day.

#### IV.IJ. INSPECTION SCHEDULES AND PROCEDURES

- IV.<u>H</u>.1. The Permittee shall conduct inspections of the tank system as specified in ATTACHMENT 5.
- IV. $\underline{IJ}$ .2. The Permittee shall submit the results of the annual tank inspection to the Director by July  $1^{st}$  of each year.
- IV.1.3. All tests for tanks, corrosion or foundation integrity shall be certified by an independent, Utah registered, professional engineer qualified by experience and education in the appropriate engineering field.

#### IV.JK. SPECIAL TANK PROVISIONS FOR REACTIVE WASTES

IV.J<u>K.</u>1. The Permittee shall not place reactive waste in the hazardous waste tank system.

#### IV.KL. SPECIAL TANK PROVISIONS FOR INCOMPATIBLE WASTES

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- IV.<u>KL</u>.1. The Permittee shall not place incompatible wastes, or <u>incompatible</u> wastes and <u>other</u> compatible materials, in the tank system.
- IV.<u>KL</u>.2. The Permittee shall not place hazardous waste in the tank system if it <u>previously held</u> an incompatible waste or other material and the tank has not been decontaminated and previously held an incompatible waste or material.

#### IV.LM. <u>CLOSURE AND POST-CLOSURE CARE</u>

- IV.LM.1. At closure of the tank system, the Permittee shall follow the procedures in ATTACHMENT 6 and remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste and manage them as hazardous waste unless decontaminated to the standard established in ATTACHMENT 6.
- IV.LM.2. If the Permittee demonstrates that all contaminated soils cannot be practically removed or decontaminated, in accordance with the Closure Plan, the Permittee shall close the tank system as a landfill and perform post-closure care following the contingent procedures in ATTACHMENT 6.



### **WASTE MANAGEMENT** & RADIATION CONTROL

### HAZARDOUS WASTE STORAGE PERMIT

SAFETY-KLEEN SYSTEMS, INC. (SAFETY-KLEEN PIONEER ROAD)

July 15, 2005 XXX XX, 2016

#### STATE OF UTAH PERMIT

#### July 15, 2005 XXXX XX, 2016

#### PERMITTEE:

Safety-Kleen Systems, Inc. 1066 South Pioneer Road Salt Lake City, Utah EPA Identification Number UTD980957088

Pursuant to the Utah Solid and Hazardous Waste Act, 19-6-101, et. seq., Utah Code Annotated 1953, as amended, and the regulations promulgated by the Utah Solid and Hazardous Waste Management and Radiation Control Board, codified in the Utah Administrative Code R315, and pursuant to the Solid Waste Disposal Act, 42 U.S.C. 3251 et. seq., as amended by the Resource Conservation and Recovery Act of 1976, 42 U.S.C. 6901 et. seq., and the Hazardous and Solid Waste Amendments of 1984 (HSWA), a permit is issued to Safety-Kleen Systems, Inc. (hereinafter referred to as the Permittee), to operate a hazardous waste storage facility located 1066 South Pioneer Road Salt Lake City, Utah, latitude 40° 42′ 58″ North and longitude 112° 57′ 30″ West.

The Permittee shall comply with all the terms and conditions of this permit. The permit consists of Modules I through IV and Attachments 1 through 8. The Permittee shall also comply with all applicable State rules, including R315-1-R315-260 through R315-266, R315-9, R315-12-R315-124, R315-268, R315-270, R315-273through R315-14, R315-16, R315-50, and R315-101.

Applicable rules are those that are in effect on the date of issuance of this permit and any self-implementing provisions and related rules that, according to the requirements of HSWA, are automatically applicable to the Permittee's hazardous waste management activities, notwithstanding the conditions of this permit.

This permit is based on the premise that the information submitted in the original permit application, dated December 15, 1986, as modified by subsequent amendments, and permit modification requests received throughout the term of the original permit; the permit renewal application received December 19, 1997, as modified by the submission of subsequent amendments and permit modification requests received throughout the term of the permit; and the permit renewal application received January 13, 2015, is accurate. The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts, or the Permittee's misrepresentation of any relevant facts at any time, shall be cause for the termination or modification of this permit, the initiation of enforcement action, including criminal proceedings, or any combination of these remedies. The Permittee shall inform the Director of the Division of Solid and Hazardous Waste Management and Radiation Control of any deviation from or changes in the information on which the application was based which would affect the

Permittee's ability to comply with the terms and conditions of this permit. The Director will enforce all terms and conditions of this permit. Any challenges to any condition of this permit shall be appealed to the Utah Solid and Hazardous Waste Management and Radiation Control Board in accordance with the applicable provisions of the Utah Code Annotated.

This permit is effective as of <u>July 15XXXX XX</u>, <u>20052016</u>, and shall remain in effect until <u>July 15XXXX XX</u>, <u>20152026</u>, unless revoked and reissued pursuant to <u>R315-3-4.2R315-270-41</u>, terminated pursuant to <u>R315-3-4.4R315-270-43</u>, or continued in accordance with <u>R315-3-5.2R315-270-51</u> and the conditions of this permit.

Signature: _	Date:
C	<del>Dennis R. Downs</del> Scott T. Anderson
	Executive Secretary Director
	Utah Solid and Hazardous Division of Waste Management and Radiation Control
<del>Board</del>	

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Exhibit B-1. Closure Cost Estimate Worksheet, Hazardous Waste Units, Safety-Kleen Systems, Inc. Service Center, Salt Lake City, UT (5/03) - Costs Updated for Inflation to 2016

	Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
1.	PROJECT COORDINATION AND SCHEDULING				
	Prime Contractor Costs - Obtain subcontractor quotes to implement closure activities	Project Manager	\$ <del>92</del> 116	6	\$ <del>552696</del>
	<ul> <li>Coordinate scope and schedule of project activities with owner/operator, decontamination contractor, regulatory agencies and analytical laboratory</li> </ul>	Project Manager	\$ <del>92</del> 116	4	\$ <del>368464</del>
	- Review facility permit and closure plan	Project Engineer Field Supervisor	\$ <del>78</del> 99 \$ <del>60</del> 76	6 12	\$4 <del>68</del> 594 \$ <del>720</del> 912
	- Prepare project/site specific Health and Safety Plan	Health/Safety Specialist	\$ <del>78</del> 99	6	\$468594
	<ul> <li>Participate in on-site coordination and orientation meeting with owner/operator and decontamination contractor</li> </ul>	Project Manager	\$ <del>92</del> 116	2	\$ <del>184232</del>
	- Prepare project activity and project status reports	Project Manager	\$ <del>92</del> 116	4	\$ <del>368464</del>
	- Office Expenses - Miscellaneous Expenses		\$ <del>100</del> 127 \$ <del>100</del> 127	1 1	\$ <del>100</del> 127 \$ <del>100</del> 127
	Activity 1.	Subtotal			\$ <del>3,3284,210</del>

MOBILIZE TO SITE AND PREPARE FOR CLOSURE/CLOSURE OVERSIGHT

- MOBILIZE TO SITE AND PREPARE FOR CLOSURE/CLOSURE OVERSIGHT
  Assumptions

   Waste solvent tank is full (15,000 gallons)

   Permitted capacity of CSA (4,500 gallons), Return and Fill Station (224 gallons), and Flammable Materials Shelter (3,300 gallons) is 8,024 gallons (146 55-gallon drums)

   Waste solvent transported to Aragonite, UT. Unit cost is based on \$130 fbs per 55-gallon drum, and \$0.000 pound of bulk waste parts washer solvent, and includes treatment and disposal.

   Generator knowledge used for disposal/treatment of waste solvent and spent antifreeze (i.e. no sampling required). However, 2 waste characterization samples are conservatively included.

   Waste haulers costs to transport drums to reclaimer based on RS Means. Documentation of unit costs provided in notes at the end of the cost estimate

   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

Owner/Operator Costs - Closure project supervision and oversight	Remediation Manager	\$4 <del>,000</del> 5,063	LS	\$ <del>4,000</del> 5,063
Prime Contractor Costs - Project Management and Supervision	Project Manager	\$ <del>92</del> 116	2	\$ <del>184232</del>
- Supervise waste loading activities	Field Supervisor Travel Per diem (all activities)	\$ <del>6076</del> \$ <del>750949</del> \$ <del>150</del> 190	10 1 7	\$600760 \$750949 \$1,0501,330
- Collect representative waste characterization sample of drummed wastes	Field Supervisor Supplies/Shipping	\$ <del>60</del> 76 \$ <del>150</del> 190	1	\$ <del>60</del> 76 \$ <del>150</del> 190
Subcontractor Costs - Subcontractor mobilization/demobilization and licensing	Lump Sum	\$ <del>10,000</del> 12,656	LS	\$ <del>11,000</del> 13,922
- Transfer tank contents to tankers	Foreman/labor/equipment	\$ <del>2,9003,670</del>	LS	3,1904,037
- Transport waste solvent to a TSD for treatment/disposal Assumes 3 trucks to transport 15.000 gallons (5000 gallon/tanker) Bulk Transportation at \$659823/load Tanker Washout Fee at \$209253/load 15000 gallons = 120,000 pounds Disposal at \$0.050.06/pound	Bulk Transportation Tanker Washout Fee TSD(cost per lb)	\$650823 \$200253 \$0.050.06	3 3 120000	\$ <del>1,9502,469</del> \$ <del>600</del> 759 \$ <del>6.000</del> 7.200
- Transfer drums in CSA to trucks	Foreman/labor/equipment	\$ <del>365</del> 462	LS	\$ <del>402</del> 508
- Transport drums to TSD for Treatment/Disposal Assumes 3 trucks to transport 146 drums (60/trailer) Drum Transportation at \$404999/load Aragonite State Fees \$28/teafee structure has changed, but assume an equivalent cost Estimated disposal/treatment cost (per drum) - \$130162/drum	Drum Transport State Fees Disposal of drums	\$4 <del>00</del> 506 \$28 \$ <del>130</del> 165	3 <del>102</del> 146	\$ <del>1.200</del> 1,497 \$ <del>2,8563,615</del> \$ <del>18,980</del> 24,090
Waste characterization sample analysis     Waste characterization analysis to consist of TCLP VOCs, SVOCs and Metals		\$ <del>627</del> 794	2	\$ <del>1,254</del> 1, <del>588</del>
Activity 2. Subtota	ıl		-	\$ <del>54,226</del> 68,285

- STORAGE TANK DECONTAMINATION AND REMOVAL (1 Tank)

  - STORAGE TANK DECONTAMINATION AND REMOVEL IT TAIK)
    Assumptions:

     Tank and appurtenant equipment are removed and scrapped
     Riinsate sampling is not necessary because the tanks will be scrapped
     Prime Contractor field supervisor travel is accounted for in above activity
     Prime Contractor per diem includes rental car, room and meals
     Assumes secondary containment removed
     Assumes collection of 2 soil samples from beneath waste solvent contain

  - ent area is necessary

- Assumes collection of 2 soil	samples from beneath	waste solvent containme
<ul> <li>Subcontractor costs include</li> </ul>	labor and all expenses	to complete each task

ubcontractor costs include labor and all expenses to complete each task				
Prime Contractor Costs - Project Management and Supervision	Project Manager	\$ <del>92</del> 116	4	\$ <del>368464</del>
- Supervise Storage Tank Decontamination and Removal Activities	Field Supervisor	\$ <del>60</del> 76	20	\$ <del>1,200</del> 1, <del>520</del>
- Inspect Secondary Containment	Project Engineer Travel Per diem	\$ <del>78</del> 99 \$ <del>750</del> 949 \$ <del>150</del> 190	4 1 4	\$312396 \$750949 \$600760
- Collect soil samples	Field Supervisor Sample supplies/shipping	\$ <del>60</del> 76 \$ <del>150</del> 190	4 LS	\$ <del>240304</del> \$ <del>150</del> 190
Subcontractor Costs - Disconnect electrical appurtenances	Labor/equipment	\$ <del>450</del> 570	LS	\$4 <del>95</del> 627
Decontaminate 1 waste AST, 80' piping and Containment Area     Wash\triple rinse tank. piping and containment with high pressure spray     Remove wash\trinse water, containerize in drums     Cost for transportation and wash water disposal included in activity 8 below	Foreman/labor/equipment	\$ <del>2,100</del> 2,658	LS	\$ <del>2,310</del> 2,924
- Demolish 1 AST and piping, haul for remelt	Foreman/labor/equipment	\$ <del>1,750</del> 2,215	LS	\$ <del>1,925</del> 2,437
Demolish Containment Area, load concrete for disposal/recycling     Laboratory Subcontractor Costs	Foreman/labor/equipment Disposal/Recycling (26 cubic yards)	\$ <del>6,500</del> 8,227 \$ <del>16</del> 20	LS YD	\$ <del>7,150</del> 9,050 \$4 <del>58</del> 572
- Analyze 2 soil samples for VOCs, SVOCs, and Metals	VOCs @ \$100127/sample SVOCs @ \$240266/sample Metals @ \$90114/sample EnCore Sample Container @ \$2430/s Total per sample cost	ample x 2/sample \$448567	2	\$ <del>986</del> 1,247

		Hourly Rate or	Hours or Unit	Subtotal (Includes 10%
Activity	Category	Unit Charge	Estimate	Markup for Subcontractors
DECONTAMINATE ONE CONTAINER STORAGE AREA issumptions:  CSA located inside warehouse and consists of a concrete slab floor with curbing and trench and is app Decontamination shall consist of washing with a high-pressure detergent/water solution and triple rinsit 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 Assumes up to 2 soil samples will be collected from beneath the CSA Field supervisor qualified to collect soil and rinsate samples Subcontractor costs include labor and all expenses to complete each task	roximately 840 sq. ft. ng with tap water			
Prime Contractor Costs				
Inspect the floor of CSA for cracks, gaps, or other potential lapses of integrity	Project Engineer	\$ <del>78</del> 99	2	\$ <del>156</del>
- Fill cracks and gaps (if necessary) prior to implementing decontamination	Field Supervisor	\$ <del>60</del> 76	2	\$ <del>120</del>
- Supervise and document decontamination of CSA	Field Supervisor	\$ <del>60</del> 76	6	\$360
- Collect sample of final rinsate from CSA, submit for laboratory analysis	Field Supervisor	\$ <del>60</del> 76	2	\$ <del>120</del>
- Core through concrete at 2 locations beneath CSA	Field Supervisor	\$ <del>60</del> 76	2	\$ <del>120</del>
	Equipment	\$ <del>100</del> 127	day	\$ <del>100</del>
- Collect 2 soil samples beneath CSA for analysis of VOCs, SVOCs and metals	Field Supervisor Sample supplies/shipping	\$ <del>60</del> 76 \$ <del>300</del> 380	4 LS	\$ <del>240</del> \$ <del>300</del>
Subcontractor Costs  Decontaminate 1 container storage area  Assumes decontamination with detergent/water solution, and scrubbing with bro and triple rinsing with high pressure spray. Wash/rinse water containerized and i	Foreman/labor/equipment oms, mops, etc., transferred to drums	\$ <del>900</del> 1,139	LS	\$ <del>990</del> 1,
Laboratory Subcontractor Costs				
- Analyze 1 rinsate sample for VOCs and SVOCs	VOCs @ \$100127/sample			
	SVOCs @ \$200253/sample Total per sample cost	\$ <del>300</del> 380	1	\$ <del>330</del>
- Analyze 2 soil samples for VOCs, SVOCs and Metals	VOCs @ \$100 127/sample SVOCs @ \$210266/sample Metals @ \$90 114/sample EnCore Sample Container @ \$2 Total per sample cost	4 <mark>30</mark> /sample x 2/sample \$448 <mark>567</mark>	2	\$ <del>986</del> 1,
Activity 4.	Subtotal			\$3,8224
DECONTAMINATE THE RETURN/FILL STATION INSUMPRINESS AND A SEARCH STATION INSUMPRINES. Washing shall consist of a high-pressure detergent/water solution and triple rinsing with lar pawter. The RF structure, including the dumpsters/drum washers will be saved for reuse Drum washers shall be removed from the RF and staged within the warehouse RIIIsate sample required for drum washers (2) and secondary containment (3 total) for VOCs and SVO Assumes up to 2 soil samples will be collected from beneath the return/fill containment area Prime Contractor protect engineer and field supervisor travel and per diem accounted for in above active Prime Contractor per diem includes rental car, room and meals Subcontractor costs include labor and all expenses to complete each task				
Prime Contractor Costs				
- Supervise and document removal of residual sludges (if necessary)	Field Supervisor	\$ <del>60</del> 76	4	\$ <del>240</del>
- Supervise washing of R/F Station and associated components (i.e. piping, pumps, and a	ppurtena Field Supervisor	\$ <del>6076</del>	8	\$480
- Inspect containment and document with field notes and photographs	Project Engineer	\$ <del>78</del> 99	2	\$ <del>156</del>
- Collect rinsate samples for analysis of VOCs and SVOCs	Field Supervisor Sample supplies/shipping	\$ <del>6076</del> \$ <del>150</del> 190	2 LS	\$ <del>120</del> \$ <del>150</del>
Subcontractor Costs		\$ <del>2,9003,670</del>	LS	\$ <del>3,1904</del> .

VOCs @ \$100127/sample SVOCs @ \$200253/sample Total per sample cost

VOCs @ \$199127/sample SVOCs @ \$219266/sample Metals @ \$99114/sample EnCore Sample Container @ \$2430/sample x 2/sample Total per sample cost \$448567

\$300380

3

2

Laboratory Subcontractor Costs
- Analyze 3 rinsate sample for VOCs and SVOCs

- Analyze 2 soil samples for VOCs, SVOCs and Metals

Activity 5. Subtotal

\$9901,254

\$<del>986</del>1,247

\$<del>6,312</del>7,990

Hourly Rate or Hours or Unit Subtotal (Includes 10% Estimate Unit Charge Markup for Subcontractors) Activity
DECONTAMINATE FLAMMABLE MATERIALS STORAGE SHELTER Flammable materials storage shelter consists of a metal structure with elevated grating and metal containment pans. Decontamination shall consist of washing with a high-pressure detergent/water solution and triple rinsing with tap water
 Flammable materials storage shelter each to remain in-place following closure
 Prime Contractor project engineer and field supervisor travel accounted for in above activities - Prime Contractor project engineer and near oppervisor fraver accounted on in above activities
 - Prime Contractor per diem includes rental car, room and meals
 - Assumes up to 2 soil samples will be collected from beneath the flammable materials storage shelter
 - Field supervisor qualified to collect soil and rinsate samples
 - Subcontractor costs include labor and all expenses to complete each task Prime Contractor Costs
- Inspect the floor of the Flam Shed for cracks, gaps, or other potential Project Engineer \$92116 \$184232 lapses of integrity - Fill cracks and gaps (if necessary) prior to implementing decontamination Field Supervisor \$6076 2 \$120152 - Supervise and document decontamination of Flam Shed Field Supervisor \$6076 6 \$360456 - Collect sample of final rinsate from Flam Shed, submit for laboratory Field Supervisor \$6076 2 \$<del>120</del>152 \$120152 \$100127 Field Supervisor \$<del>60</del>76 \$<del>100</del>127 - Core through concrete at 2 locations beneath Flam Shed dav - Collect 2 soil samples for analysis of VOCs, SVOCs and metals Field Supervisor \$240304 \$6076 4 LS Sample supplies/shipping \$300380 Subcontractor Costs initiate 1 Flammable Materials Storage Shelter Foreman/la Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc., and triple 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. Foreman/labor/equipment \$2,1002,658 LS \$2,3102,924 Laboratory Subcontractor Costs
- Analyze 1 rinsate sample for VOCs and SVOCs VOCs @ \$100127/sample SVOCs @ \$200253/sample \$330418 Total per sample cost \$300380 - Analyze 2 soil samples for VOCs, SVOCs and Metals VOCs @ \$100127/sample VOCs @ \$1494 [27/sample SVOCs @ \$249266/sample Metals @ \$\$9114/sample EnCore Sample Container @ \$2430/sample x 2/sample Total per sample cost \$448567 \$9861,247 \$5,1706,544 Activity 6. Subtotal DECONTAMINATE CLEANUP EQUIPMENT (If Necessary) Assumptions:

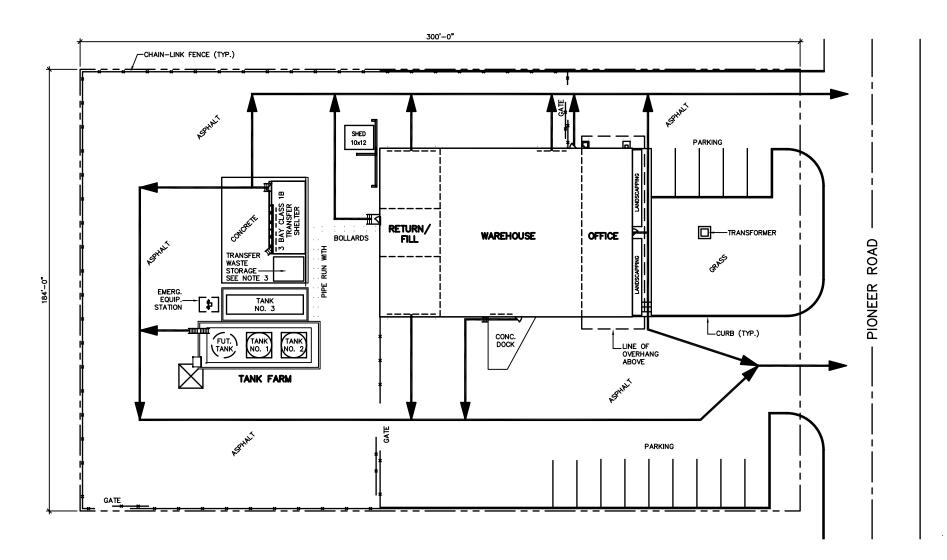
- Decontamination of Cleanup Equipment is not anticipated to be necessary. Equipment used to remove waste units will only be used following decontamination of the unit (i.e. equipment will not come into contact with hazardous waste). Other cleanup equipment such as pressure washers will be cleaned during decontamination of each respective unit.

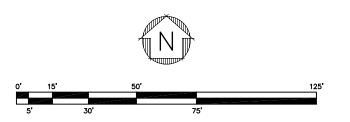
- If performed, washing of cleanup equipment shall consist of a high-pressure detergent/water solution and triple rinsing with tap water Prime Contractor Costs
- Supervise washing of cleanup equipment \$240304 \$6076 Subcontractor Costs \$500633 \$550696 Construct decon area with 6ml plastic sheeting and 4" absorbent berm Foreman/labor/equipment LS - Decontaminate cleanup equipment aminate cleanup equipment.
Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc.,
and triple rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums
Cost for transportation and disposal of furns included in Activity 8 believe. \$7901,000 CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES Assumptions:
- 1000 gallons wash water generated from decontamination of waste AST, piping and secondary containment (including residual sludge) = 18 drums - Total galloris was water generated from decontamination of wase AST, piping and secondary containment (including residual sludge) = 16 druns - 1000 gallons of wash water generated from decontamination of CSA = 18 druns - 500 gallons of wash water generated from decontamination of return/fill station and drum washer = 9 drums - 224 gallons sludge removed from drum washer (included in above drum count) - 250 gallons of wash water generated from decontamination of both Flammable Materials Storage Shelter = 5 drums - PPE, plastic sheeting, disposable cleanup equipment, consumables, etc. contained in 4 drums - Waste characterization samples not necessary for wash/water disposal (wash water from solvent tank, R/F and containment disposed as hazardous waste solvent, CSA wash water also disposed as hazardous waste) Prime Contractor Costs
- Ensure drums are properly labeled, coordinate pick up and disposal \$368464 Project Manager - Purchase 54 55-gallon drums Drums @ \$3544 each \$3544 54 \$2.0792.614 Subcontractor Costs
- Transfer drums of decon waste to trucks Foreman/labor/equipment (no charge, included in above costs) 0 LS 0 - Transport drums to TSD for Treatment/Disposal Assumes 1 truck to transport 54 drums (60/trailer)
Drum Transportation at \$409506/load
Estimated disposal/treatment cost (per drum) - \$130165/drum \$400506 \$7,0208,910 Drum Transport Disposal of drums Activity 8. Subtotal \$9.86712.494

Exhibit B-1. Closure Cost Estimate Worksheet, Hazardous Waste Units, Safety-Kleen Systems, Inc. Service Center, Salt Lake City, UT (5/03) - Costs Updated for Inflation to 2016

	Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal (Includes 10% Markup for Subcontractors)
9.	CLOSURE CERTIFICATION REPORT Assumptions: - CLOSURE CERTIFICATION REPORT certified by an Utah-registered PE and S-K	Category	Onit Charge	LSumate	warkup for Subcontractors)
	Prime Contractor Costs - Compile field notes and photographs	Project Manager Project Engineer	\$ <del>92116</del> \$ <del>78</del> 99	2 2	\$ <del>184232</del> \$ <del>156</del> 198
	- Compile rinsate and soil sample data into summary tables	Project Manager Project Engineer	\$ <del>92</del> 116 \$ <del>78</del> 99	4 8	\$ <del>368464</del> \$ <del>624792</del>
	- Draft Closure Certification Report	Project Manager Project Engineer	\$ <del>92</del> 116 \$ <del>78</del> 99	8 16	\$ <del>736</del> 928 \$ <del>1,248</del> 1,584
	- Prepare closure certification statement	Sr. Project Engineer	\$ <del>115</del> 146	2	\$ <del>230</del> 292
	- Office Expenses - Miscellaneous Expenses	Drafting/Clerical Copying/Postage	\$400506 \$ <del>100</del> 127	1 1	\$4 <del>00</del> 506 \$ <del>100</del> 127
_	Activity 9. Sul	btotal			\$4,0465,123
CO 1. 2. 3. 4. 5. 6. 7. 8. 9.	IST ESTIMATE ACTIVITIES SUMMARY PROJECT COORDINATION AND SCHEDULING MOBILIZE TO SITE AND PREPARE FOR CLOSURE/CLOSURE OVERSIGHT STORAGE TANK DECONTAMINATION AND REMOVAL (1 Tank) DECONTAMINATE ONE CONTAMINE STORAGE AREA DECONTAMINATE THE RETURN/FILL STATION DECONTAMINATE THE RETURN/FILL STATION DECONTAMINATE CLEANUP EQUIPMENT (If Necessary) CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES CLOSURE CERTIFICATION REPORT				\$3,3284,210 \$64,22668,285 \$16,94321,440 \$3,8224,839 \$6,3127,990 \$5,1796,544 \$7901,000 \$9,86712,494 \$4,0465,123
	TOTAL CLOSURE COST ESTIMATE				\$ <del>104,503</del> 131,925

- ties:
   Prime Contractor Rates obtained from TriHydro Corporation 2003 Schedule of Charges
   Subcontractor prices provided by Evans Environmental Construction, Glenwood, Iowa
   10% markup on prime contractor, construction, and analytical contractor costs. No markup on disposal costs at Aragonite.
   Laboratory Subcontractor Rate Obtained From Analytical Service, Inc. (Norcross, Georgia) Schedule of Charges
   Waste solvents and drummed waste treatment/disposal unit cost obtained from Clean Harbors Aragonite, Utah Facility at \$430.06 per 55 gallon drum, and \$0.05.06 pound for bulk solvent.





ATTACHMENT 2 APPENDIX A

#### GENERAL NOTES

- 1.) NON-PERMITTED TANKS & EQUIPMENT MAY CHANGE
- 2.) ACTUAL EVACUATION ROUTES MAY VARY DUE TO MAINTENANCE/ UPKEEP OF FACILITY.
- 3.) TRANSFER WASTE STORAGE AREA HAS CONTAINMENT PANS WITH GRATING OVER THEM.

#### EVACUATION ROUTE LEGEND

EVACUATION ROUTE

#### TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	15,000 USG	USED MINERAL SPIRITS	10'-6"Ø FLAT BOTTOM VERTICAL STORAGE TANK
2	15,000 USG	CLEAN 105° MINERAL SPIRITS	10'-6"Ø FLAT BOTTOM VERTICAL STORAGE TANK
3	12,000 USG	CLEAN 150° MINERAL	8'-0"Ø HORIZONTAL STORAGE TANK

#### REVISIONS

NO.	DESCRIPTION	BY	СНК	APPR	DATE
A	RELEASED TO CL FOR PERMIT MOD.	мвн	KJM	WEY/CL	072696
В	REVISE TO SHOW CURRENT CONDITIONS	JEK	RS	RS	050707
С	REMOVE RECYCLE SYSTEM	JEK	RS	RS	121510
TITLE					

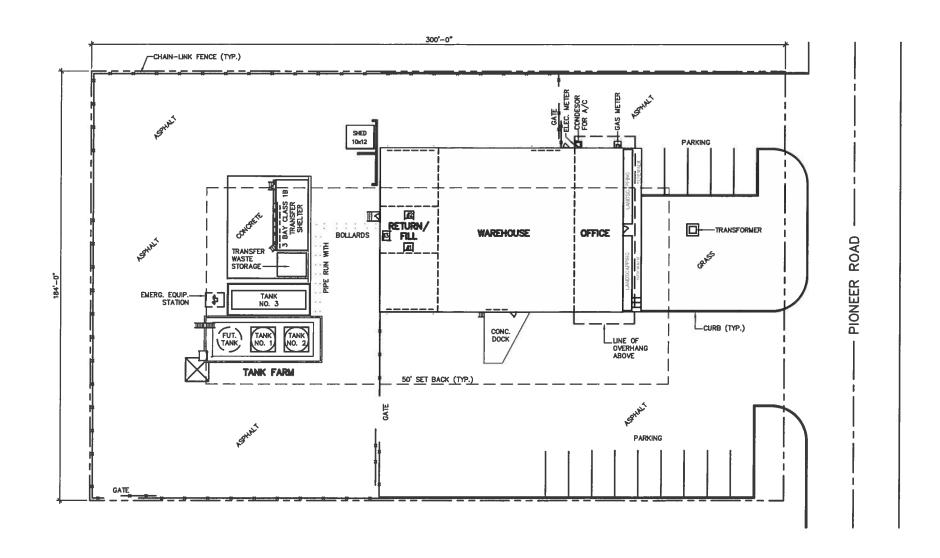
SITE PLAN SHOWING EVACUATION ROUTES

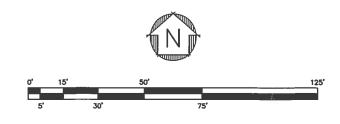
SAFETY-KLEEN SYSTEMS, INC.

S400 LEPACY DR. CLUSTER B SLDG. 3 PLANG, TX.75024

PHONE S00—658—6740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1"=20'-0"	мвн				07-25-96
SERVICE CENTER LOCATION			SC-DWG NUMB	ER	REV
SALT LA	KE CIT	r, UT	716601-	QJPB003	c





#### GENERAL NOTES

- 1.) NON-PERMITTED TANKS & EQUIPMENT MAY CHANGE
- ACTUAL PIPING CONFIGURATION MAY VARY DUE TO MAINTENANCE/ UPKEEP OF FACILITY.

#### TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	15,000 USG	USED MINERAL SPIRITS	10'-6"# FLAT BOTTOM VERTICAL STORAGE TANK
2	15,000 USG	CLEAN 105° MINERAL SPIRITS	10'-6"# FLAT BOTTOM VERTICAL STORAGE TANK
3	12,000 USG	CLEAN 150° MINERAL SPIRITS	8'-0"# HORIZONTAL STORAGE TANK

#### **REVISIONS**

NO.	DESCRIPTION	BY	CHK	APPR	DATE
Α	NEW RELEASE	мвн	KJM	WEY/CL	052394
В	ADDED TANK 3 & TRANSFER STOR. RELEASED TO CL FOR PERMIT MOD.	MBH	КЈМ	WEY/CL	072696
C	ADD STIL EQUIPMENT	JEK	RS	RS	032907
D	ADD DETAILS	JEK	RS	RS	033007
E	ADD WASTE STORAGE	JEK	RS	RS	051707
F	REMOVE RECYCLE SYSTEM	NEK	RS	RS	121510

#### PROPRIETARY STATEMENT

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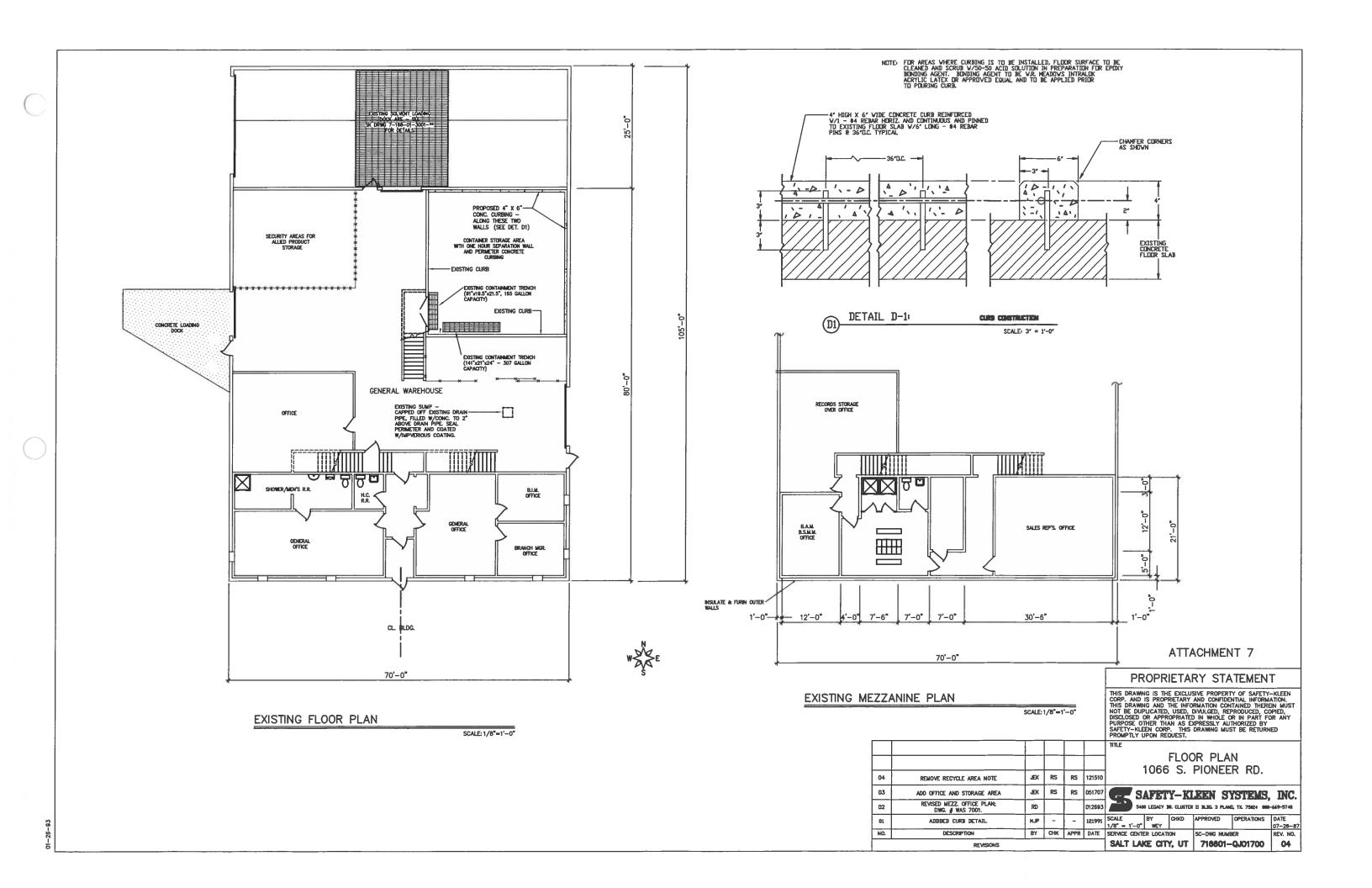
1300 Bosse Industrial Drive - Suite 200 - Outumble - MO 66202 • Phone: (873) 443-7100 • Fee: (873) 443-7181 •

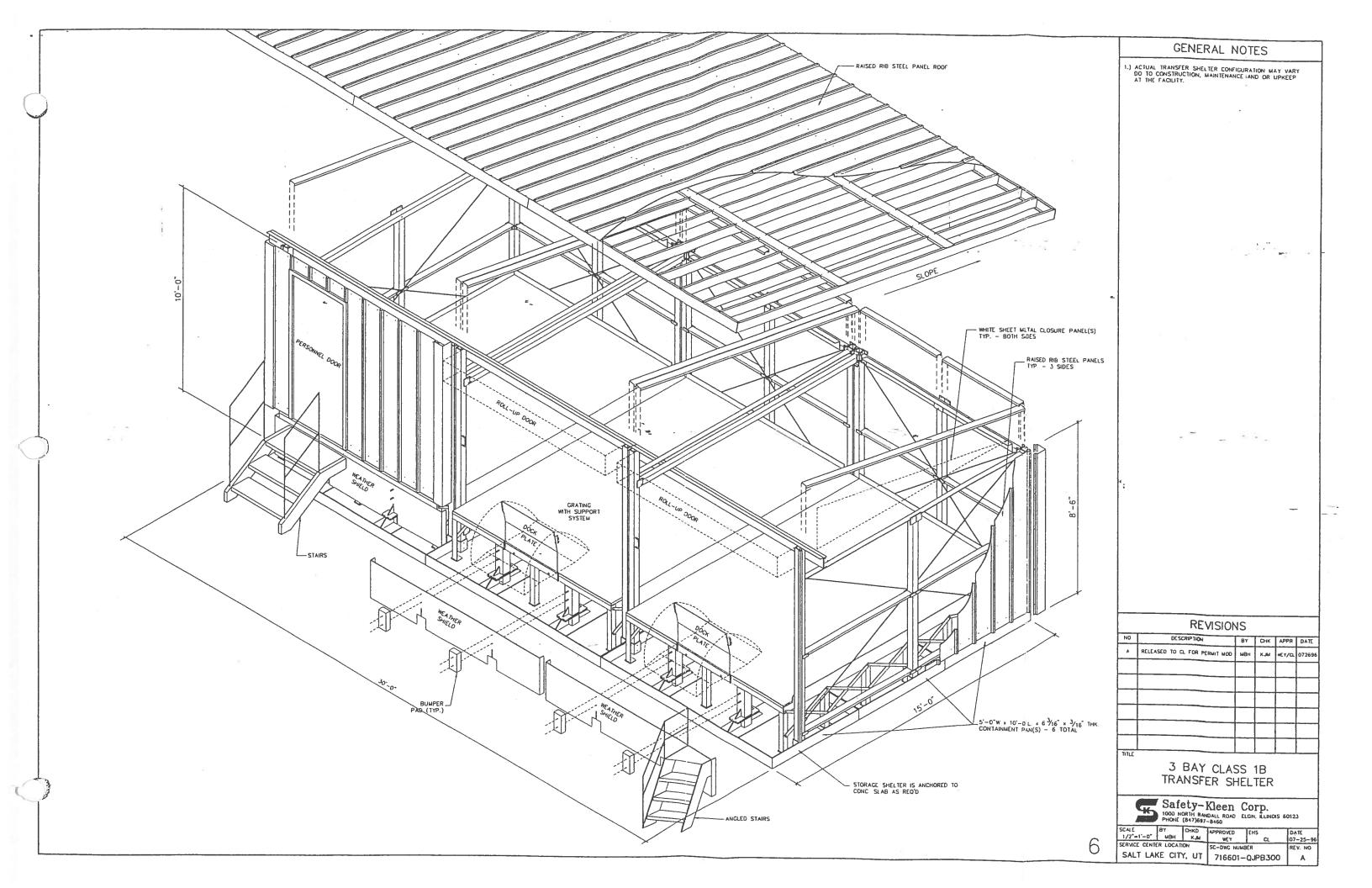
TITLE

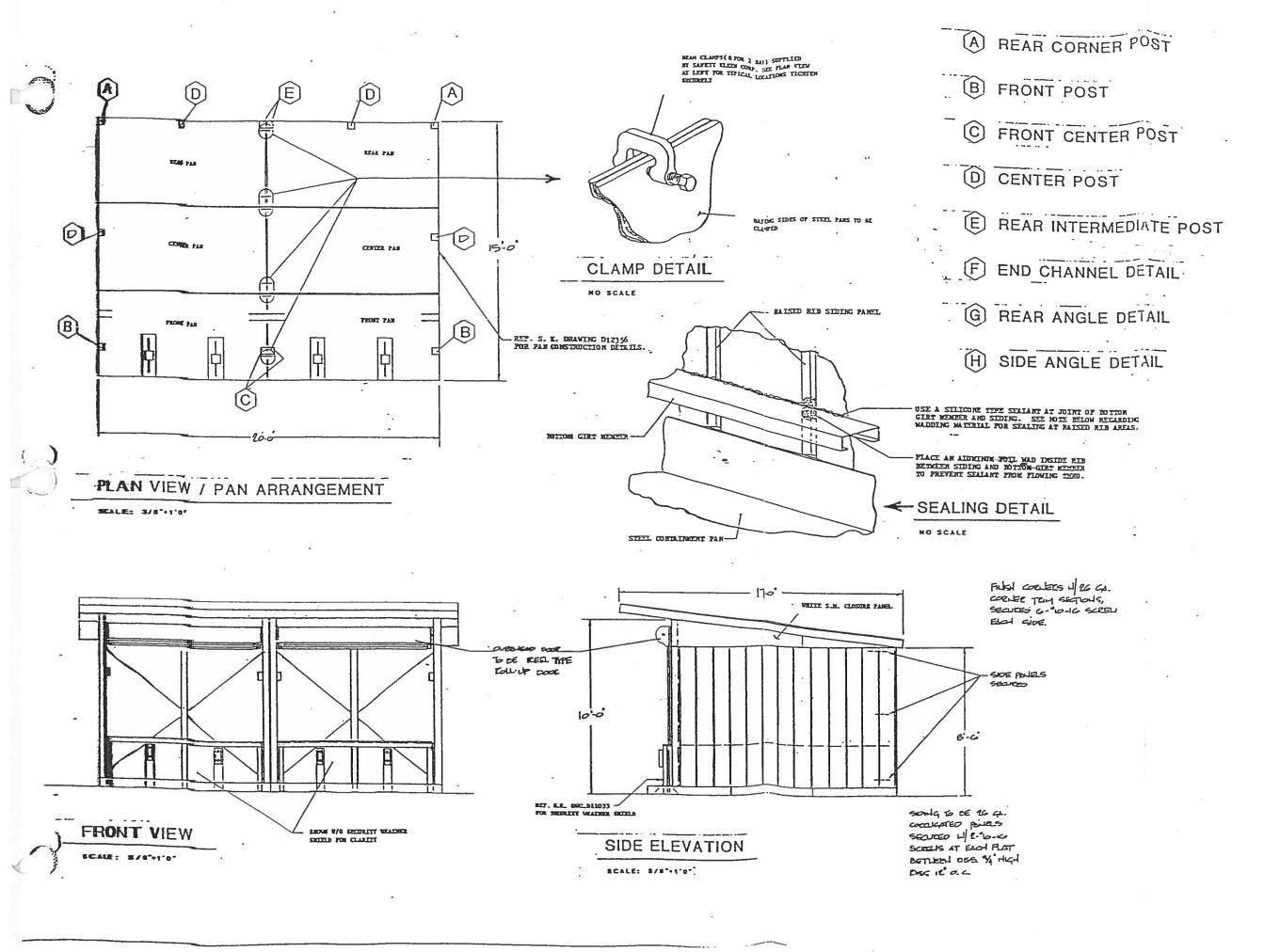
SITE PLAN EXISTING

SAFETY-KLEEN SYSTEMS, INC.

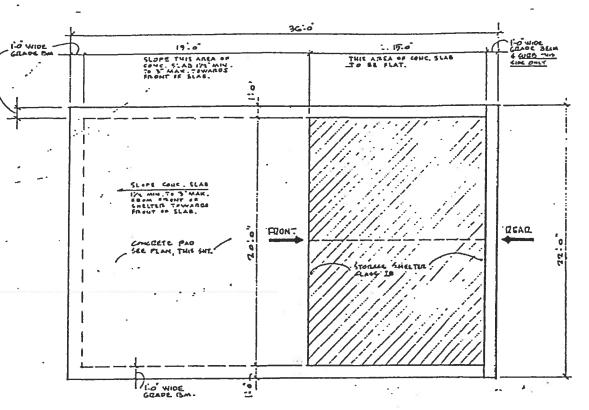
ATTACHMENT 7







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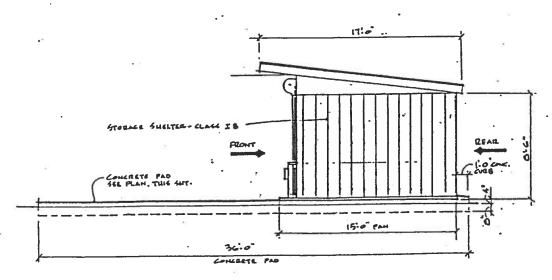


B LA W - SHOWING STORAGE SHELTER ON CONCRETE PAD

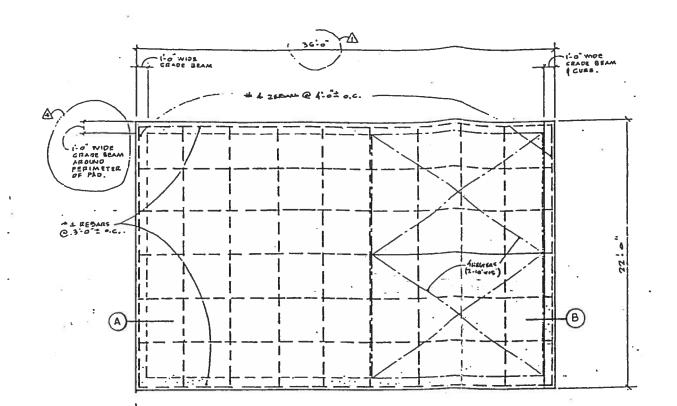
Six Containment Pans 10x5 x 69/6".

Drain pipes through advacent pans

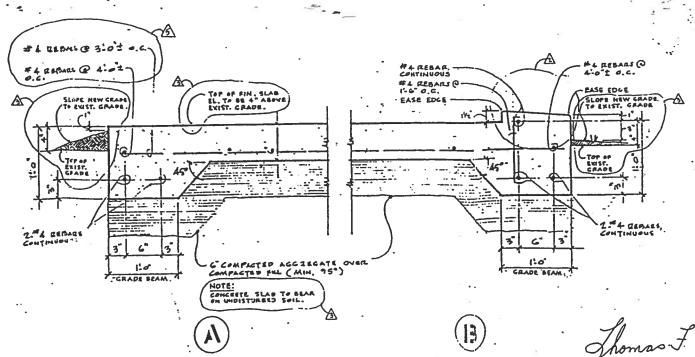
Sront to back - See drawing D12356



ELEVATION - SHOWING STORAGE SHELTER ON CONCRETE PAD



D L A M - CONCRETE PAD FOR STORAGE SHELTER. CLASS IB



DETAILS

Thomas F. Troller 9/19/91

A 100 PLAN 4 PLENTINGS - COLC AND 4 THERE GORTON (A) "INIST A EXTENDED CHAPE BEAM AROUND PERIMETER OF PAD C.C. "FACTA 221811-KICEN COLT).

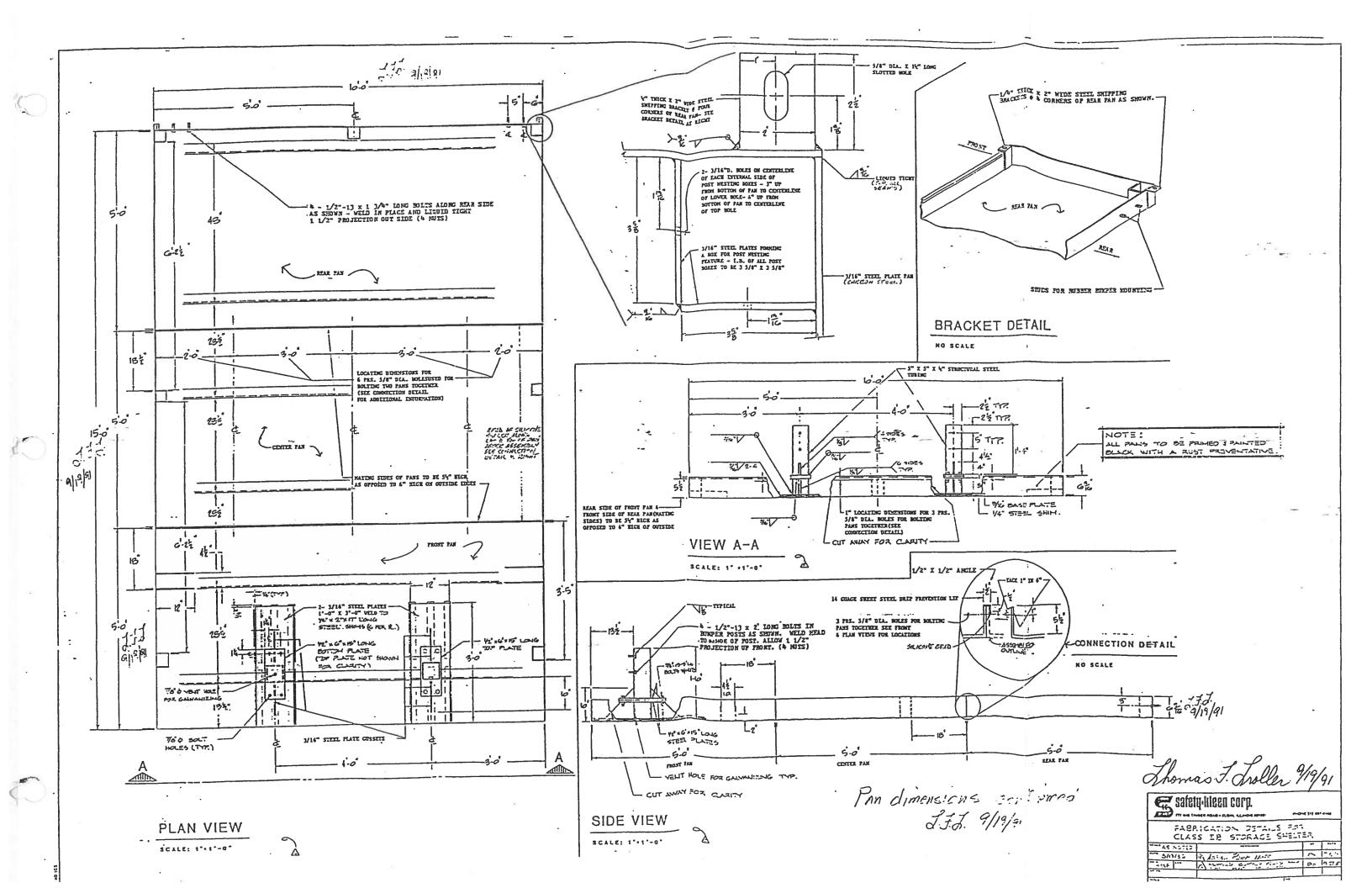
THE DOS TROOGS PADD CLOCK CLASSES OF HE

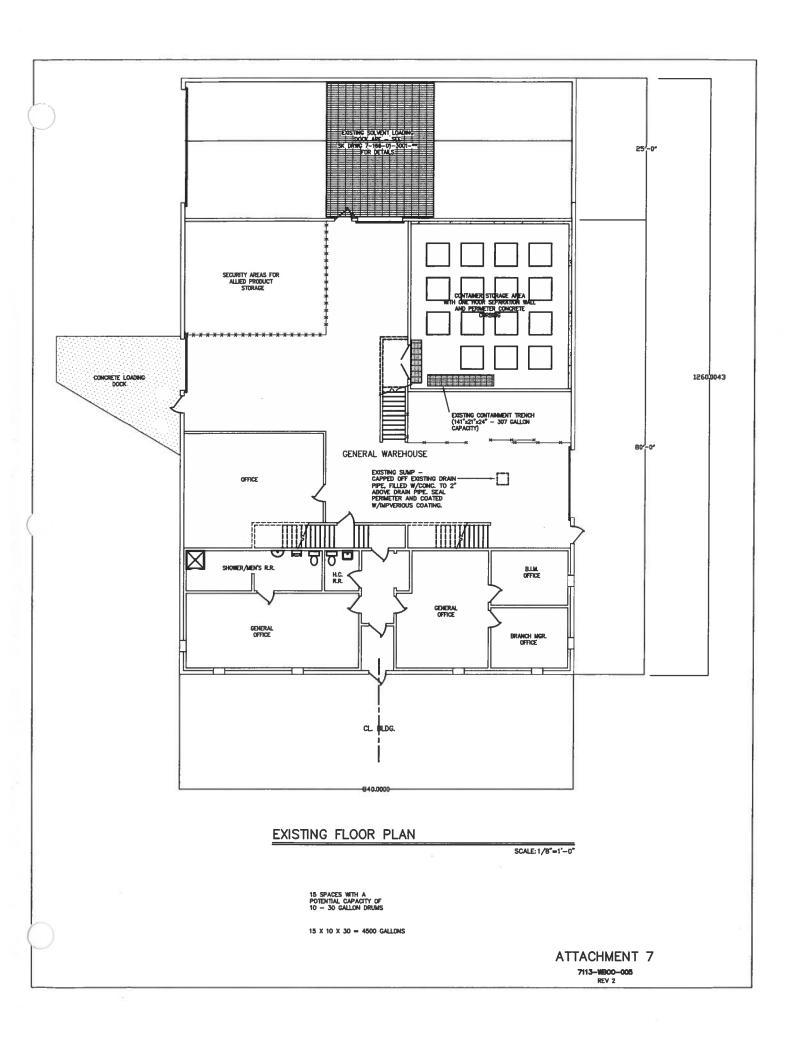
PAD, CONCRETE - FOR CLASS IS
STORAGE SHELTER

AC NOTEP

C. S VIEWEL

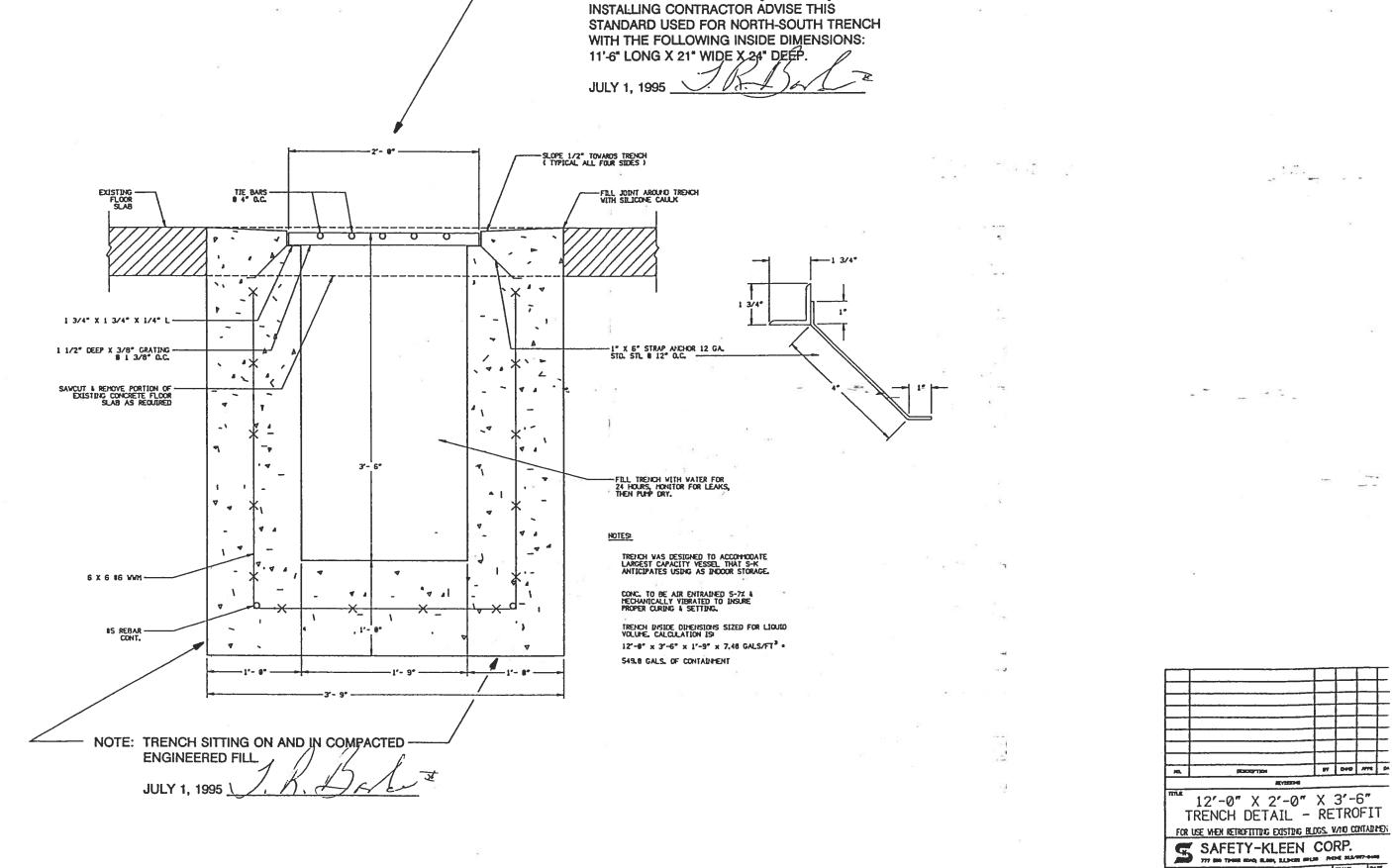
C. S VIE





## Metal Container Storage Shelter Example Storage Configuration

			>a			
					-	
					-	
				5		
		i:				
-		 Ą				



NOTE: BOTH PROJECT ENGINEER [E. YOUNG] AND

2" = 1"-8" PBG 2/14 FOR SERVICE CENTER BRANCH

A13022

No cracks

Container Storage - Part of warehouse a Coated consists transis by door grating over transhes

chserved Sealist and concrete appeared Satisfactory 9. 10M 1.67 1-8 to bottom of lipide 7.66157 0.1667 1.462 1 0.125 1=1 long 2.0 11.75 long 2 feet deep to bottom of lip 1 1.75 lip is 1/2" deep by 1/2" wide

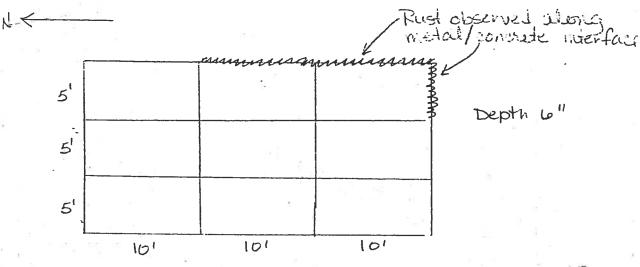
Volume = 1.667' x 7.667' x 1.667' + (8x0.1667 x 0.1667) 2+ (1.667 x 0.1667 x 0.1667) 2 + 1.75' x 11.75' x 2' + (12x0125 x 0.125) 2 + (1.75 x 0.125' x 0.125') 2 = 21.3. F1<sup>3</sup> + 0.4 F1<sup>3</sup> + 0 + 41.1 FT<sup>3</sup> + 0.3 F7<sup>3</sup> + 0 = 63.1 F7<sup>3</sup> 63.1 F7<sup>3</sup>  $= \frac{7.48 \text{ gal}}{ET^3} = 472 \text{ gal}$  50 SHEETS 100 SHEETS 200 SHEETS

AMPAD 22-141 5 22-142 10 22-144 20 Flammable Materials Shelter-Separate metal enclosure

Drums sit on grating over mutal containment pans. Pans the coated wiplack paint. Shelter is botted to concrete pace

minor rust observed where paint has chipped.

Recommend new coading be applied.



North 3 pans looked recently coated

Volume = 15 x 30 x 0.5 = 25 FT3

Each pan = 5x10 x 0.5 = 55 FT3

25 FT 3 x 2.48 gal = 187 gal FT 3 225 FT 3 x 2.48 gal = 1,683 gal

Note: Pans were sandblasted and painted black after the sune 1997 inspection

## Chemical Resistant Urethane

# A Superior Chemical & Abrasion Resistant Coating

#### **Description**

A 2-component, aliphatic urethane coating. Available in clear, white, gray, beige and other attractive colors.

An advanced aliphatic urethane, this 2-component nonyellowing coating offers the latest in chemical, abrasion and soiling resistance. Specifically formulated for use on concrete surfaces where a variety of chemical spills are common. It is ultraviolet light resistant and produces optimum light reflectance.

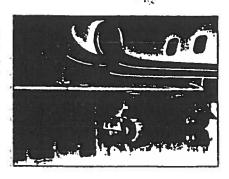
#### **Advantages**

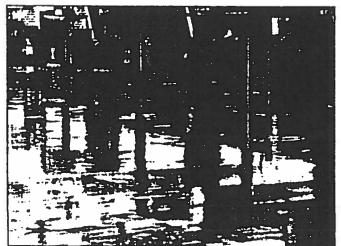
- Provides excellent chemical resistance
- Contains exceptional anti-soiling abrasion resistant properties roduces optimum light reflectance
- Resists effects of ultraviolet light



31.44 \*\*\* . .

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 ១០១២៣២០១២





## Moisture Cure Urethane— Clear & Pigmented

# **Guaranteed to Outperform Conventional Coatings & Sealers**

**Description** 

An oil-free moisture cure urethane (MCU) coating formulated at several solids levels for specific job requirements.

Wears up to five times longer than conventional coatings. MCU produces a tough, protective shield that guards concrete surfaces against heavy traffic wear and penetration of oil, grease and chemicals.

Ensures a high film build and high-gloss appearance despite heavy traffic. Increases light reflectance and decreases energy costs.

**Advantages** 

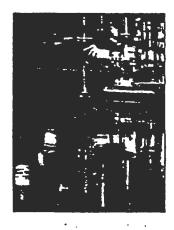
- Wears up to 5 times longer than ordinary coatings
- Provides exceptional durability
- High film build protects against heavy traffic abuse
- Resists oil, grease & most chemicals
- Exhibits outstanding reflectivity
- MCU color additives are available in a variety of colors

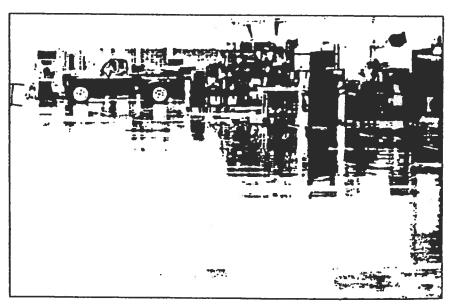
Where to Use

Restrooms Supermarket Storage Areas Aircraft Hangars Laundries
Chemical Production Areas
Auto Dealerships
Industrial Plants
Interior Loading Docks
Warehouses
Food Processing Plants
Power Plants
Parking Garages
Textile Mills
Paper Mills
Printing Plants

Bottling Plants Marine Dealerships School Garages

e egggeding och modsgare de er ette sommer folk och





## **Urethane Support Products**

#### **Preparation** Chemicals

Highly concentrated degreasers, solvent and waterbased cleaners, and acid conditioners are available to insure proper surface preparation. Nonflammable stripper is also available to remove permanent coatings that may be disposed of as dry waste.

#### **Color Additives**

Concentrated color additives designed for pigmenting clear MCU systems. Available in a variety of attractive high-gloss colors. Reduce cost and inventory requirements.

#### Thinners

Specially formulated for proper thinning of MCU and CRU systems and cleanup of application equipment.

#### **Primer**

A 2-component, water-based epoxy primer/bond coat. This primer is ideal on both damp and dry concrete surfaces prior to the application of urethane systems. Reduces installation downtime and

insures superior adhesion of topcoats. No objectionable odor or fire hazard.

#### Catalysts

CRU and MCU catalysts to accelerate the drying and cure times of the coatings.



A complete line of preparation products for concrete floors.



FEDERAL INTERNATIONAL CHEMICALS 1191 S. Wheeling Road, Wheeling, IL 60090

(312):541-9000

Manufacturing facilities in Illinois, New Jersey, Florida and California. Warehouse in Colorado.

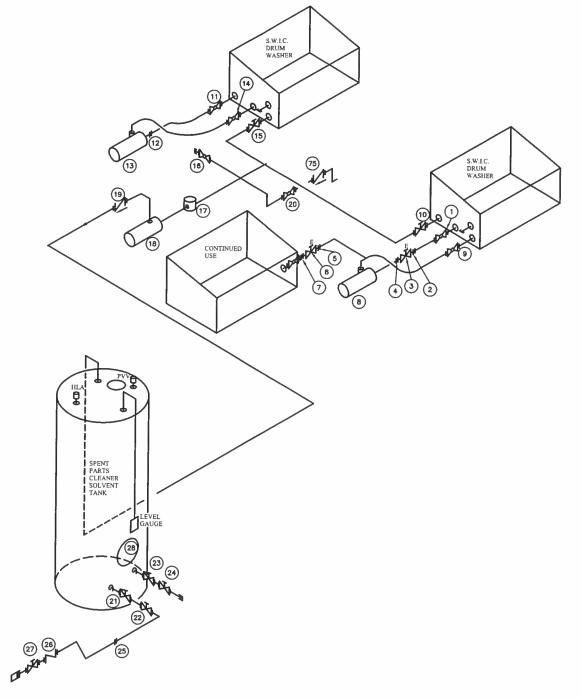
n of The Holspar Corporation



APR 14 1987

JT 18054

Experiment Description PARETY-KLEEN THEP.



HAZARDOUS WASTE PARTS CLEANER SOLVENT TANK SYSTEM PIPING SCHEMATIC

GENERAL NOTES

- PIPING CONFIGURATION AS INDICATED WAS FIELD VERIFIED ON 5-9-07.
- NUMBERS IN CIRCLES INDICATE TAGS ATTACHED TO EQUIPMENT OR FITTING AS SHOWN.
- 3. NON-PERMITTED TANKS & EQUIPMENT MAY CHANGE.
- ACTUAL PIPING CONFIGURATION MAY VARY DUE TO MAINTENANCE AND/OR UPKEEP OF FACILITY.

#### PROPRIETARY STATEMENT

THIS DRAWING IS THE EXCLUSIVE PROPERTY OF SAFETY-KLEEN CORP. AND IS PROPRIETARY AND CONFIDENTIAL INFORMATION. THIS DRAWING AND THE INFORMATION CONTAINED THEREIS MUST NOT BE DUPLICATED, USED, DIVULGED, REPRODUCED, COPIED, DISCLOSED OR APPROPRIATED IN WHOLE OR IN PART FOR ANY PURPOSE OTHER THAN AS EXPRESSLY AUTHORIZED BY SAFETY-KLEEN CORP. THIS DRAWING MUST BE RETURNED PROMPTLY UPON REQUEST.

#### SYMBOL LIST

1	CAMLOC COUPLING
$\triangleright$	90" CAMLOC COUPLING
DET.	GATE VALVE

DA	INTERNAL	EMERGENCY	VALVE

1 1	SCREWED	COUPLING

ኢ	CHECK VALVE
X	STRAINER

4	PUMP
0	PUMP

A	REDUCER/INCREASER

#	SCREWED UNION
1	CAP

		_		_
1				
$\boldsymbol{\nu}$	HACE	CI	ANID	

EI FYIRI F	HUGE

### PIPE PENETRATION/ATTACHMENT TO EQUIPMENT



#### CONNECTION TYPES

1	FLANGED
X	SCREWED





SALT LAKE CITY, UT

JEK RS RS 121207 REMOVE VALVE & TAG # 32 **ENVIRONMENTAL** SHOW ASBUILT CONDITIONS GAS GAS RS 071007 PIPING SCHEMATIC

RS 002807 (SPENT PARTS CLEANER SOLVENT) GAS GAS REVISED TAGGING GAS GAS RS GAS GAS GAS REVISED TAGGING R3EVISED TAGGING

REVISED TAGGING/PIPING FOR STILL REMOVAL

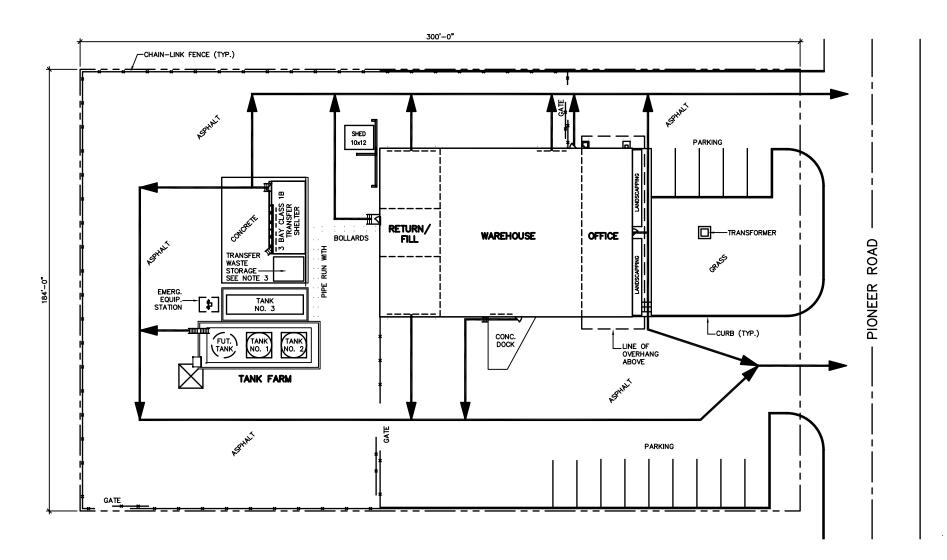
NEW ISSUE FOR PERMIT DESCRIPTION

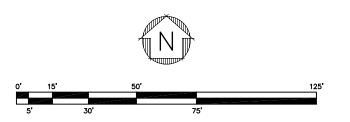
REVISIONS

_		(DI LIT	IIA	1712	TUTATAT	IK SOL V	CINI)
	051707	GZ S	AFET	Y-K	LEEN S	YSTEMS,	INC
	051407					, TX. 75024 BOD-	
3	031407	SCALE NONE	BY PSC	CHKD GAS	APPROVED GAS	OPERATIONS GAS	DATE 3/14/07
k	DATE	SERVICE CENTE	R LOCATIO	N	SC-DWG, NO.	REV. NO.	

7113-5600-350

		FITTING SCHEDULE
	1	1.5' THREADED BALL VALVE
	(2)	1.5' FLANGE TO ELECTRONIC VALVE #3
	3	ELECTRONIC VALVE
	<b>④</b>	1.5' FLANGE FROM ELECTRONIC VALVE #3
	<u>(5)</u>	1.5' FLANGE TO ELECTRONIC VALVE #6
	6	ELECTRONIC VALVE TO CUP VAT LINE
	0	1.5' FLANGE FROM ELECTRONIC VALVE #6
	8	RE-CIRCULATION PUMP SOUTH WASHER
	9	1.5' BALL VALVE SOUTH DRUM WASHER
	10	2" GATE VALVE SOUTH DRUM WASHER
	11)	1.5' BALL VALVE NORTH DRUM WASHER
	(12)	1.5' FLANGE TO RE-CIRCULATING PUMP #13
200	13	RE-CIRCULATION PUMP NORTH WASHER
	14)	1.5' BALL VALVE NORTH DRUM WASHER
	(15)	2" GATE VALVE NORTH DRUM WASHER
1	16)	2' BALL VALVE AUXILIARY LINE
	17	BASKET STRAINER
	(18)	TRASH PUMP
	(19)	S' CHECK VALVE
ļ	(60)	2' BALL VALVE SUMP LINE
ļ	(51)	3' INTERNAL EMERGENCY VALVE - WASTE TANK
	(55)	3° GATE VALVE - WASTE TANK
	(3)	3' EMERGENCY VALVE AUXILIARY LINE
	24)	3' GATE VALVE AUXILIARY LINE - WASTE TANK
	(25)	3' FLANGE
	(59)	3' CHECK VALVE
	(P)	3' GATE VALVE - TANKER CONNECTION
9536.1	(58)	20' FLANGE - WASTE TANK MANWAY
L	(75)	2' CHECK VALVE - SUMP LINE
72.0		
CCPB0272.DWC		
-		
S		
7-90-90	$\longrightarrow$	
8		
-		





ATTACHMENT 2 APPENDIX A

#### GENERAL NOTES

- 1.) NON-PERMITTED TANKS & EQUIPMENT MAY CHANGE
- 2.) ACTUAL EVACUATION ROUTES MAY VARY DUE TO MAINTENANCE/ UPKEEP OF FACILITY.
- 3.) TRANSFER WASTE STORAGE AREA HAS CONTAINMENT PANS WITH GRATING OVER THEM.

#### EVACUATION ROUTE LEGEND

EVACUATION ROUTE

#### TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS					
1	15,000 USG	USED MINERAL SPIRITS	10'-6"Ø FLAT BOTTOM VERTICAL STORAGE TANK					
2	15,000 USG	CLEAN 105° MINERAL SPIRITS	10'-6"Ø FLAT BOTTOM VERTICAL STORAGE TANK					
3	12,000 USG	CLEAN 150° MINERAL	8'-0"Ø HORIZONTAL STORAGE TANK					

#### REVISIONS

NO.	DESCRIPTION	BY	СНК	APPR	DATE									
A	RELEASED TO CL FOR PERMIT MOD.	мвн	KJM	WEY/CL	072696									
В	REVISE TO SHOW CURRENT CONDITIONS	JEK	RS	RS	050707									
С	REMOVE RECYCLE SYSTEM	JEK	RS	RS	121510									
TITLE														

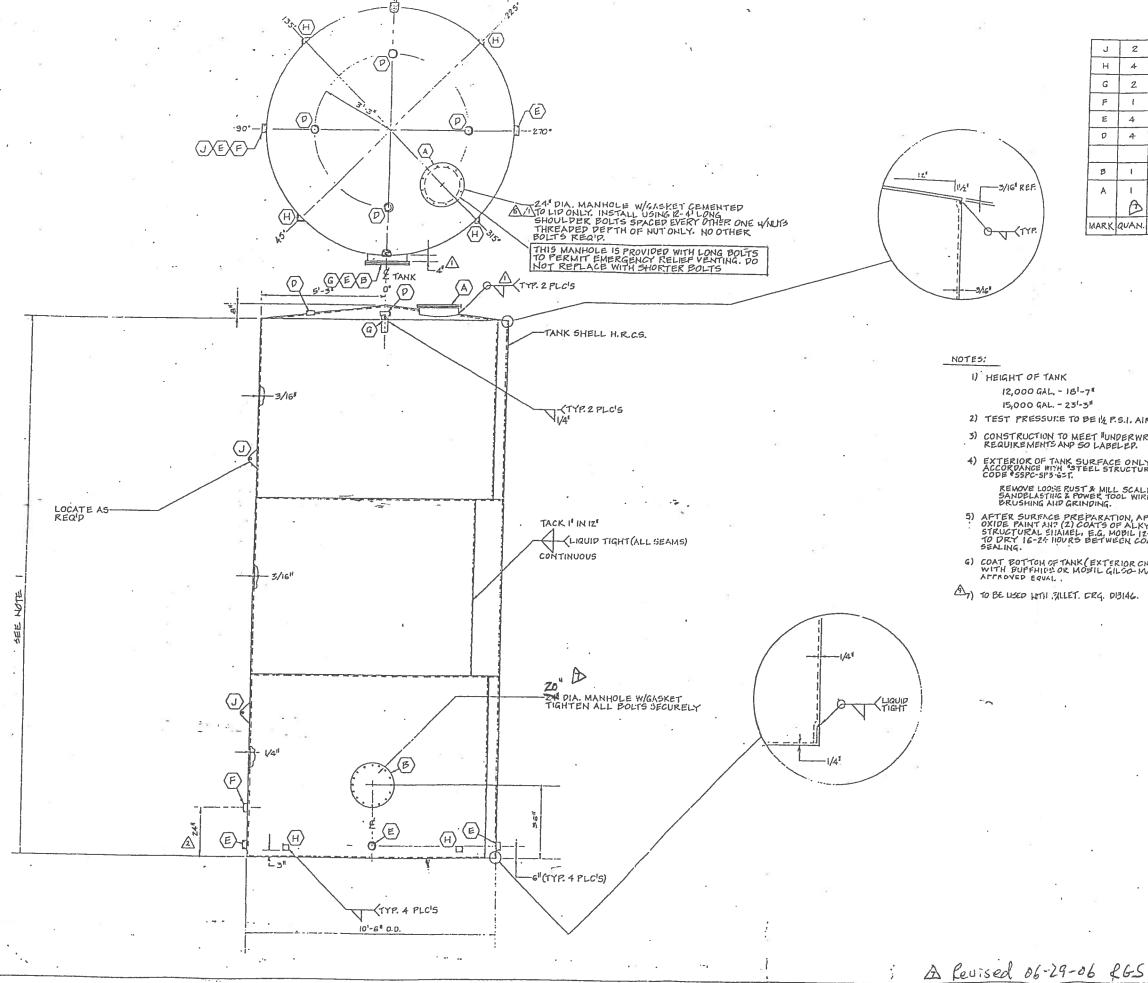
SITE PLAN SHOWING EVACUATION ROUTES

SAFETY-KLEEN SYSTEMS, INC.

S400 LEPACY DR. CLUSTER B SLDG. 3 PLANG, TX.75024

PHONE S00—655-6740

SCALE	BY CHKD		APPROVED	OPERATIONS	DATE
1"=20'-0"	мвн				07-25-96
SERVICE CENTE	R LOCATI	ON	SC-DWG NUMB	REV	
SALT LAKE CITY, UT			716601-	QJPB003	c



J	2		SIDE LIFT LUGS	
Н	4		51/2" X 5/6" X 3" LONG	
G	2		LIFT LUGS	
F	1	Aª	FULL CPLG.	
Ε	4	4"	FULL CPLG.	
D	4	46	FULL CPLG.	Pq.
В	1	24"	SHELL MANWAY	
A	B	20"	ROOF MANWAY WITH 4 FACH ½"X4" BOLTS	
MARK	QUAN.	SIZE	PESCRIPTION	

1) HEIGHT OF TANK

12,000 GAL, - 181-7"

15,000 GAL. - 231-31

- 2) TEST PRESSURE TO BEIL P.S.I. AIK MIN. & 5 P.S.I. MAX.
- 3) CONSTRUCTION TO MEET "UNDERWRITERS LABORATORIES" REQUIREMENTS AND SO LABELEP.
- 4) EXTERIOR OF TANK SURFACE ONLY TO BE PREPAKED IN ACCORDANCE WITH "STEEL STRUCTURE PAINTING COUNCIL CODE "SSPC-SP3-62T.

REMOVE LOSSE RUST & MILL SCALE BY SANDBLASTING & POWER TOOL WIRE BRUSHING AND GRINDING.

- 5) AFTER SURFACE PREPARATION, APPLY (1) COAT OF WHITE OXIDE PAINT AN? (2) COATS OF ALKYD BASE GLOSS WHITE STRUCTURAL SHAMEL, E.G. MOBIL 12-W-4. ALLOW PAINT TO DRY 16-24 HOURS BETWEEN COATS TO INSURE PROPER SEALING.
- G) COAT BOTTOM OF TANK (EXTERIOR ONLY) ADD 4" UP SIDES WITH BUFFHILD OR MOBIL GILCO-MASTIC \$ 35-J-8 OR APPROVED EQUAL.
- AT) TO BE USED WITH TILLET. TRG. 013146.

As	לי אדוו פשנטג	EL
Δ	REVISED & REPRAVIN	JW
Δ	MOVED DIMENSION	CS
4	TAIK TEST PRESSURE VIERE SINN. & T MAX.	K5
Δ	CLL TIFIED MODIFIES INFR FOR TET HANHOLE, 1796F	P.C
4	POTTOM OF TALK TO I "HOTEAP OF 4" THE PERFE	RE
ΈV	PESCHIPTION	2.4

Safely kleen corp.

12K & 15K GAL.10'-6" Ø VERTI TANK FAB. DETAILS FLAT BOT

"" A APPEN DE MAG A PIM WAS 41/2"

For: SERVICE CENTER UPGADE D105

#### **GENERAL NOTES**

I. A., STEE, SURFACES TO BE PREPARED IN ACCORDANCE HITH "STEE, STRECTURE PRINCIP COUNCIL"

PRIOR TO PANTING STELL, REMOVE LOSE RUST & MILL STALE BY SANDRIANT DALER DOLWIRE BRUSHING OF GRADING.

AFTER STAFFLE PREPARATION, APRIT (1) COAT OF MINITE OXIDE DA LT AND (2) COATS OF A LIKTO BASE GLOSS MINITE STRUCTURAL EXAMEL, E.C. MOBIL 12-M-4, ALLCH PAINT TO DOT 16-24 HOURS BETWEEN COATS TO INSURE PROPER SEALING.

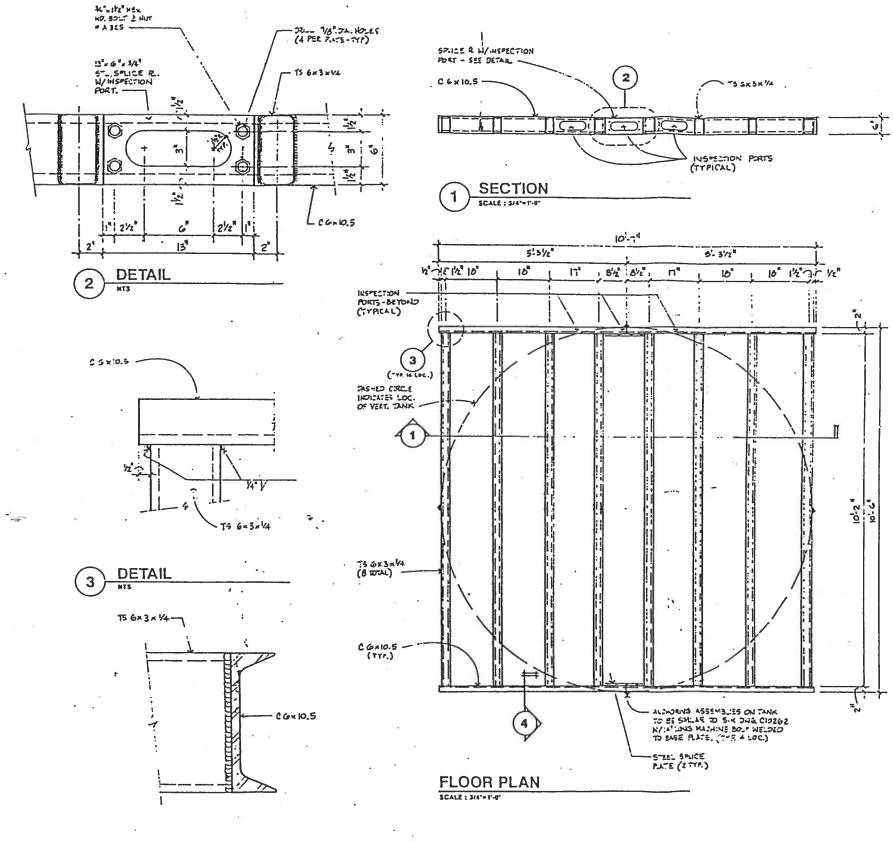
1. STEEL TUBE TO CONFORM TO ASTM FASON (Fr = 42 K.S.I.) A.. STHER STEEL TO CONFORM TO ASTM FA 30

SLALL WELDS TO SE TTO ELECTROPES.

4 SKID SHOW!) IS DESIGNED FOR THE POLLOWING TARK CONTAINING LIGHTON HAVING A SPECIFIC GRAPITY OF LESS THAN 1.0.

A. 17,000 GALLON, 10.6 DIAMETER

B. 15,000 GALLON, 10.6 DIAMETER

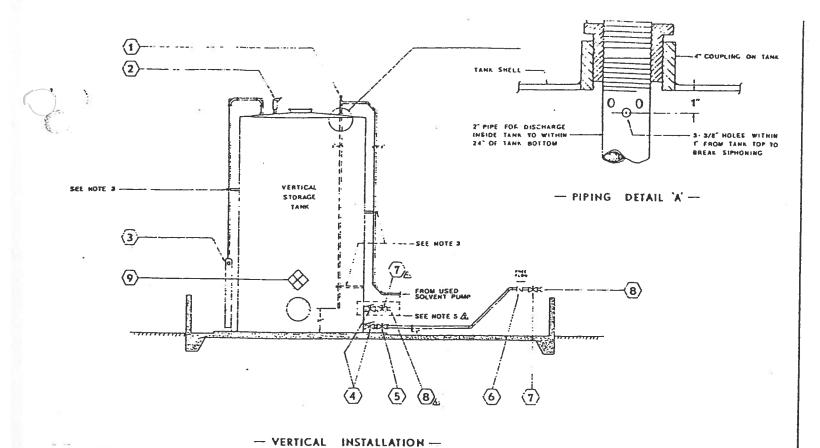


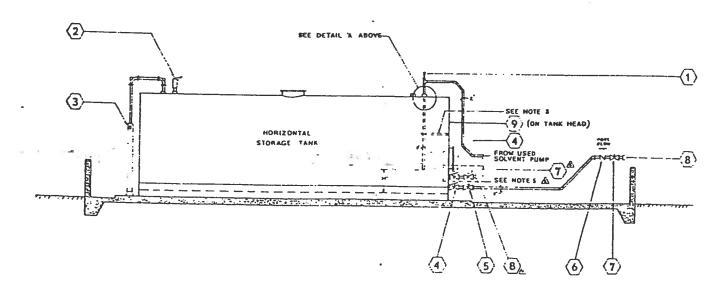
DETAIL 4)

safety-kleen corp. Project 315/007 0400 TANK SKID ""6·2·68 ""CH "" 2 % 3 A 641 2 704 80

D13146

FOR SERVICE CENTER BRANCH





-- HORIZONTAL INSTALLATION --

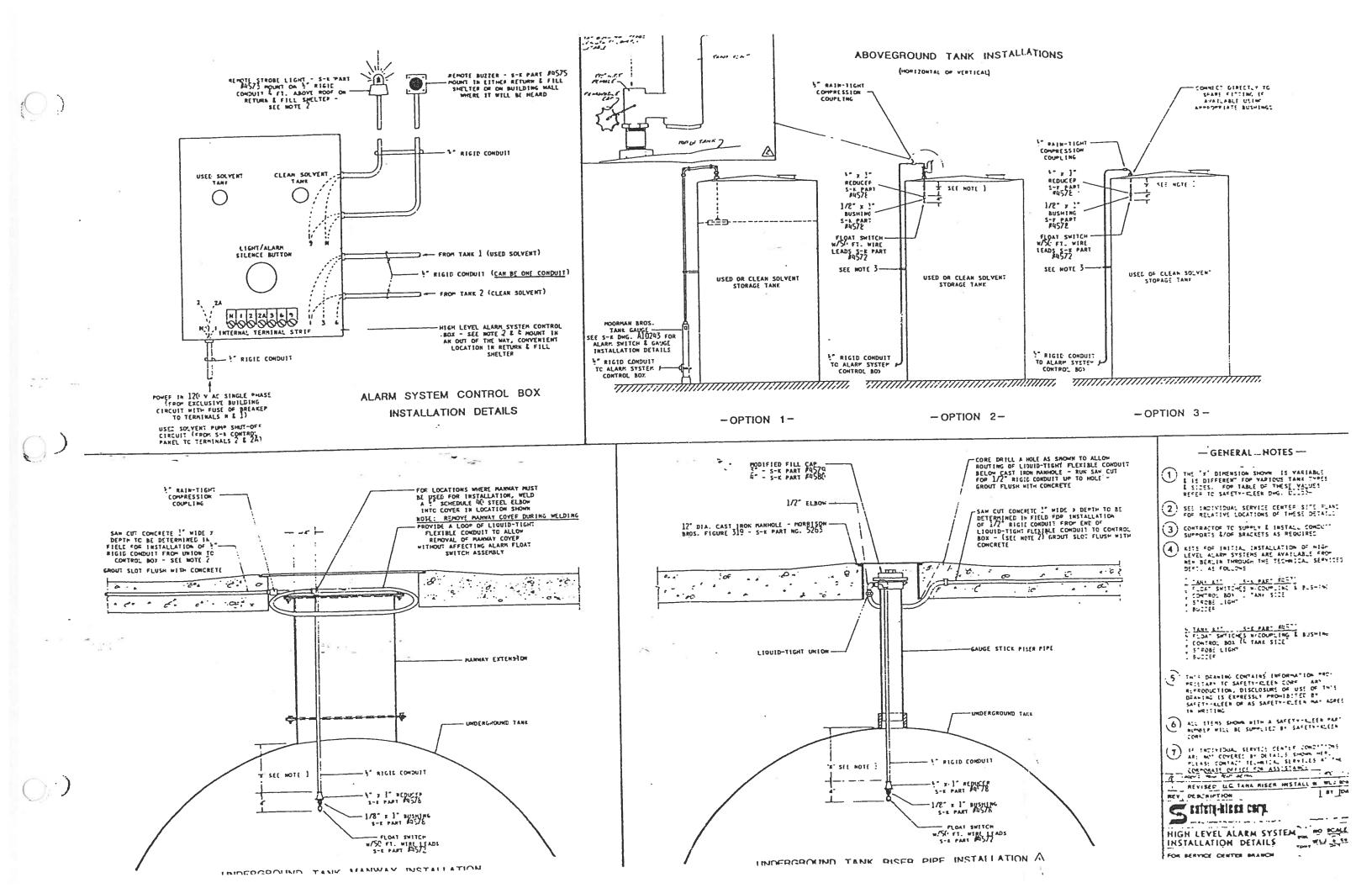
- EQUIPMENT / FIXTURE SCHEDULE -DESCRIPTION 3/8" AUTOMATIC VACUUM BREAKERS MORRISON BROS. FIG. 134-A 3/8° 5274 2" SCREMED PRESSURE/YACULE. VENT MORRISON BROS. FIG. 54E (2 DZ. PRESSURE - ] DZ. VACUUM) 5273 TANK GAUGE - MOURMAN BROS. MODEL NO. 7-5 SEE INSTALLATION DETAILS ON SAFETY-KLEEN DWG. A19243 3" INTERNAL EMERGENCY VALVE MORRISON BROS. FIG. 272-RO W/212" F FUSIBLE LINK 4 3" SEE INSTALLATION DETAILS OF SAFETY-KLEEN DWG. CII)02 3" DUCTILE IRON GATE VALVE W/ROUND FLANGED FINDS - MORRISON BROS. FIG. 234-D (5) SEE INSTALLATION DETAILS ON SAFETY-5276 3" BRONZE CHECK VALVE - MORRISON BROS. FIG. 245-A 6 3\* ,5756 3" BRONZE GATE VALVE - MORRISON SRCS. FIG. 251-6 LOCKING TYPE 7 5285 2" ALUMINUM CAMLOCA QUICK COUPLING -MORRISON BROS. MALE ADAPTER PART F M/DUST CAP & CHAIN **B** COUPLING TO BE INSTALLED SIN 'ET INCHES ABOVE & SIN (E) INCHES INSIDE TOF OF DIKE MALL. 5264 40 NFTA MATERIAL IDENTIFICATION PLACARD 2452 DISPLAY IN PLAIN SIGHT ABOVE DIRE WALL

#### - GENERAL NOTES -

- THIS DRAWING SUPERCEDES SAFETY-KLEEN CORP. DRAWINGS []0735 & C10735.
- SEE INDIVIDUAL SERVICE CENTER SITE PLANS FOR DIKE DIMENSIONS AND RELATED INFORMATION AND ALSO LOCATION AND ARRANGEMENT OF THESE PIPING DETAILS.
- <u>(3)</u> ALL PIPIME TO BE SCHEDULE AU GALVANIZED AND BE SUPPORTED EVERY EIGHT (8) RUNNING FEET CONTRACTOR TO SUPPLY ALL BRACKETS, CLAMPS, ETC. AS REQUIRED FOR SUPPORTING PIPE - ALL
  EXPOSED THREADS AT JOINTS TO BE PAINTED WITH A RUST RESISTANT EXTERIOR GRADE PAINT.
  PIPIME SUPPORT HARDMARE TO BE UNISTRUT BRAND OF APPROVED EQUIVALENT.
- 4 ALL DIRECTION CHANGES IN DIRTY SOLVENT LINES TO BE MIDE USING A COMEINATION OF  $45^\circ$  ELBOWS OR LONG SWEEF  $90^\circ$  ELBOWS.
- THIS INSTALLATION TO BE MADE WHERE NEW TANKS ARE TO BE INSTALLED AT ANY LOCATIONS PROME TO FREEZING. SEE INSTALLATION DETAILS ON SAFETY-KLEEN DWG. CIIIC  $\triangle\triangle(5)$ 16
  - ALL STEMS WITH SAFETY-KLEEN PART NO. REFERENCES WILL BE SUPPLIED TO CONTRACTOR.

THIS DRAWING CONTAINS ENFORMATION PROPRIETARY TO SAFETY-REEN CORP. ANY REPRODUCTION, DISCLOSUME ON USC OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-REEN ON AS SAFETY-REEN MAY AGREE IN MRITING.

WITHOUT I AFT - TOOL ATTACHEDOL	WL	3.1
ADDED ITEM & TO SCHEDULE & DRAWING	WLJ	1
LIADOED NOTE 6	WU	10
AN REVISED DETAIL IN MOTE & SHOWN ON DWG	WLJ	а.
ADDED MOTE & TO MOTES & TO DRAWING	wu	٠,
NO REVISION DESCRIPTION	81	Di
CE Saleis-siees Cars Sykinis	7-	7
Estell-kices coll Exhibit	.2-	
	•	
PROC Propingue - C. Dr. S. T. Marry	4 2-7 00	
USED SOLVENT STORAGE TOTAL	4 2-7 00	



38	-TABLE OF VARIABLE 'X' DIMENSION ABOVEGROUND HORIZONTAL CLEAN SOLVENT TANKS OR													
UNDERGROUND HORIZONTAL CLEAN & USED SOLVENT TANKS														
	7				-		AN E	USED	3OL	VENT	TANK	S		
CAPACITY (GAL.)	4.	5'	6.	T 7.	8.	AMETER 9.	(FT.)	1						
1900	Zu-	26*	+	1	+-	+	10	10.6	11.	12'	13	14	15*	
2000		14"	1-	<del>                                     </del>	+	-	+		-				1	
3000		10-	1110	1-	┼─	+	┼	+					- 60	
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8000			-	6-	6"	<del> </del>	1	├	<del> </del>					
9000				<del>-</del>	-	<del> </del>	14-	1	<del> </del>		* [1]	1		
19000			-		R-	6"	1	<del> </del>	<del>  </del>				1	
11900						°	14"	14-	<u> </u>					
12000			· ·		4.0	u-					1		1	
13900					<del>-</del>		10.	10"					1	
19000								-						
15000							6*							
		4000	*				8-	6°	4-					
		ABOY	EGHOU	ע סאג	ERTIC	AL CI	.EAN	SOLVE	NT TA	INKS				
DIMENSION					DIA	METER (	FT.)							
REGARDLESS F CAPACITY)	4.	5.	6'	7'	8.	9.	10'	10'6"	11'	12.	13'	14'	154	
					12°	85"	6-	5°	45"	70	20		15"	
ABO	VEGR	CUND	VER	TICAL	OR I	IORIZO	MTA	U3ED			-	لــــــــــا	5-	

#### - GENERAL HOTES-

- ELECTRICAL CONTRACTOR IS RESPONSIBLE FOR REVIEWING DRAWINGS & SCOPE OF WORK TO INSURE COMPLIANCE WITH ALL LOCAL, STATE & NATIONAL CODES ANY ALTERATIONS E/OF LODITIONS WIST BE RELAYED TO & APPROVED BY TECHNICAL SERVICES AT CORPORATE OFFICE PRIOP TO E/OF DURING INSTALLATION. FAILURE TO COMPLY WITH THE ABOVE WILL RELIEVE SAFETY-KLEEN CORP. OF ANY & ALL RESPONSIBILITIES.
- WORK THIS DRAWING WITH SAFETY-RICEN DRAWING DIISS FOR TYPICAL INSTALLATION DETAILS IF INDIVIDUAL SERVICES AT THE CORPORATE OFFICE FOR ASSISTANCE.
- MORK THIS DRAWING WITH SAFETY-KLEEN DRAWINGS BELOW FOR ELECTRICAL SCHEMATICS OF VARIOUS SYSTEMS AS
  - DISSO ALARM SYSTEM ELECTRICAL SCHEMATIC FOR TWO TARKS DISSO ALARM SYSTEM ELECTRICAL SCHEMATIC FOR FOUR THICS
- LIQUID-TIGHT COMPRESSION OF FLEXIBLE COMDUIT COUPLINGS ARE USED AT COMDUIT CONNECTION TO TANK IMPICAL SEE S-K DWG. DILSSS. THESE ARE REQUIRED FOR SERVICING LOOR REPLACEMENT OF FLOAT SWITCH UNITS AFTER INITIAL INSTALLATION.

TG REPLACE A FLOAT SWITCH, THE CONTRACTOR SHOULD DISCONNECT THE CONDUIT COUPLING & CUT THE ? WIRE LEADS. HIS WILL ALLOW REMOVAL OF AAMMAY COVER, MODIFIED FALL CAP, COUPLING ADAPTER, ETC. (DEPENDING ON THE TYPE OF INSTALLATION) IN ORDER TO REMOVE OLD FLOAT SWITCH & INSTALL NEW SWITCH. THE NEW SO FT. LEADS WILL BE PULLED THROUGH TO THE COUPLING AT THIS TIME & UNIT REINSTALL NEW SWITCH. THE NEW SO FT. NEW WIRE LEADS FROM THE COUPLING BACK TO THE CONTROL BOX SWOULD BE TIED TO THE ENDS OF THE TO THE BOX WHERE THEY WILL SERVE AS PULL WIRES FOR PULLING THE NEW LEADS THROUGH THE CONDUIT

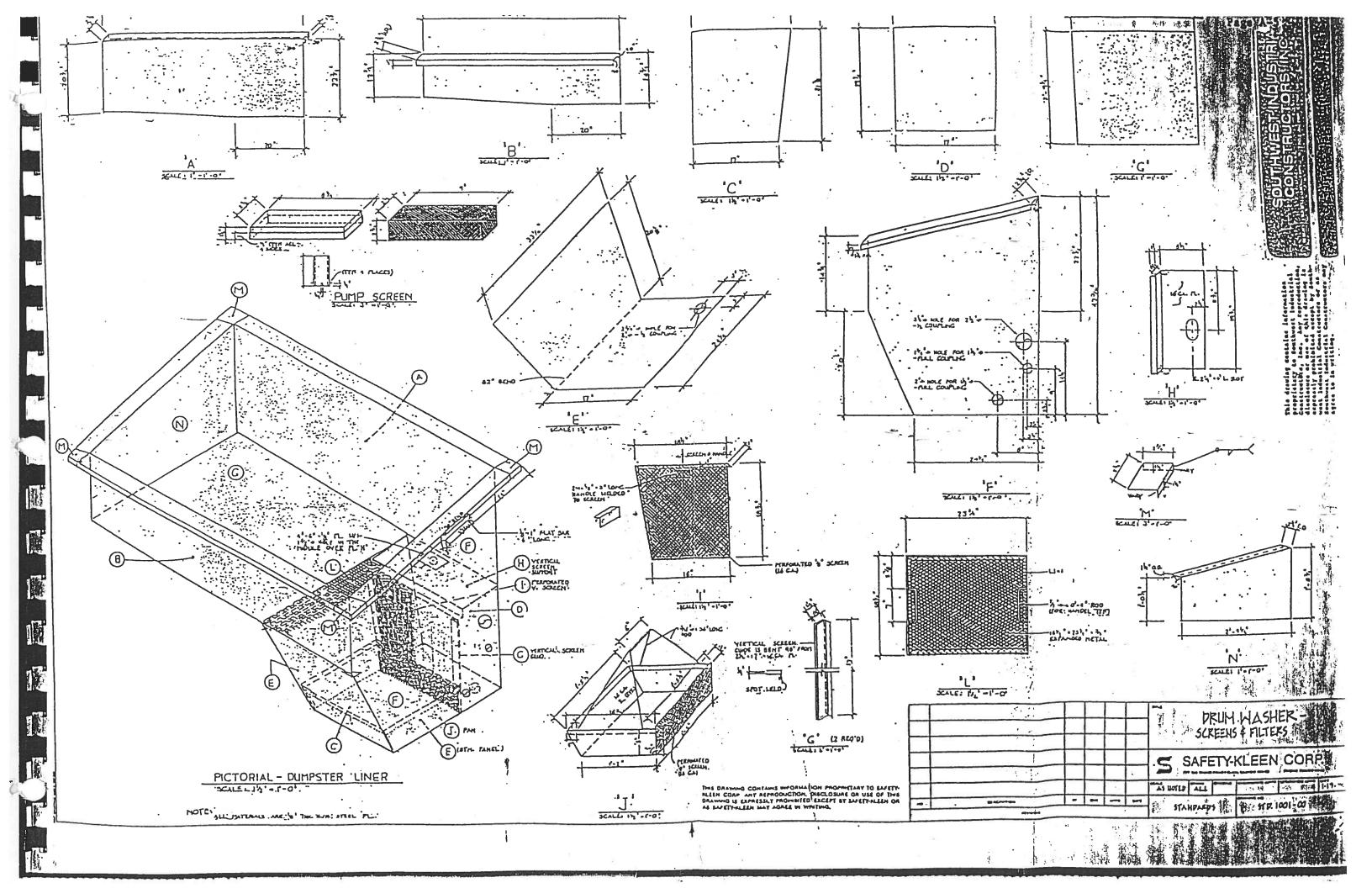
- TESTING OF THE FLOAT SWITCH & SYSTEM IS MANDATORY FOLLOWING INSTALLATION. ACTIVATING THE FLOAT SWITCH DEVICE MAY BE ACCOMPLISHED AS FOLLOWS:
  - UNDERGROUND TANKS A) PRIOR TO INSTALLING MANMAY COVER ON MARMAY INSTALLATIONS.

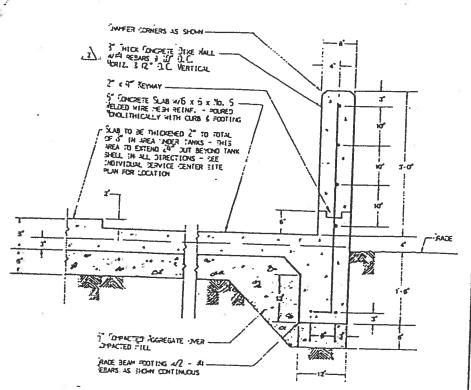
    B) BY DRIVING A MAIL OF APPROPRIATE LENGTH CROSSMISE THROUGH THE END OF THE GAUGE
    STICK OR SIMILAR PROBE AND REACHING DOWN UNDER FLOAT SMITCH ON RISER PIPE
  - ABOVEGROUND TANKS A) REACH IN THROUGH MANMAY ON TOP OF TANES. OTHER METHODS MAY BE USED AT THE DISCRETION OF THE ELECTRICAL CONTRACTOR.
- THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-LEEN CORP. ANY REPRODUCTION, DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROHIBITED BY SAFETY-REEN OR AS SAFETY-REEN MAY AGREE IN MRITING.

द्ध स्यांसा-सारस स्थान HIGH LEVEL ALARM SYSTEM WO BOARS INSTALLATION INFORMATION WILL STATE POR: SERVICE CENTER BRANCH HIPROYEMENT

95-400-052 Page A-4 -15 " I'd" HOLE ON

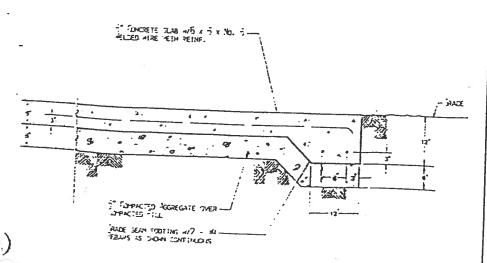
THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORP. ANY REPRODUCTION, DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROMISTED EXCEPT BY SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITING.



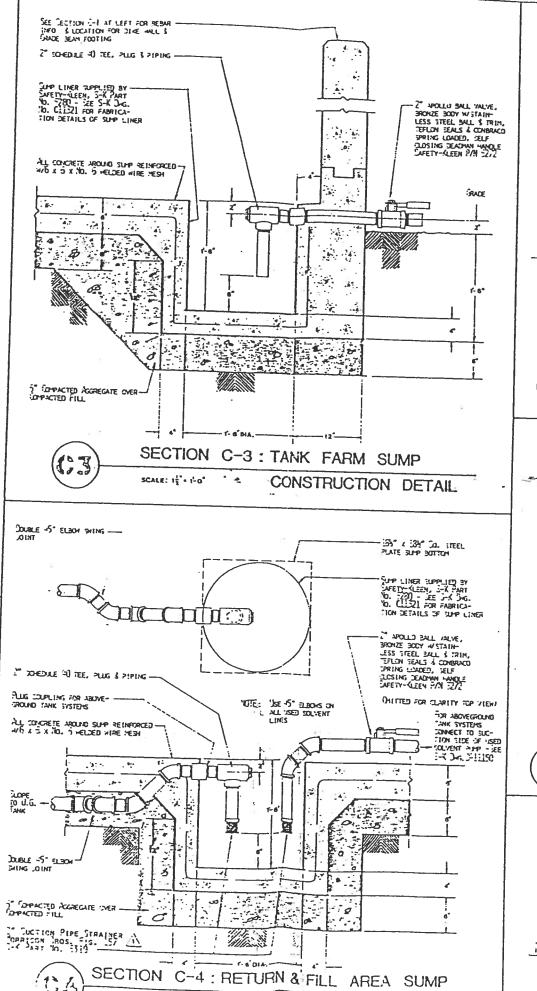


SECTION C-1: TANK SLAB & DIKE WALL

SCALE, 19-19-07 CONSTRUCTION DETAIL

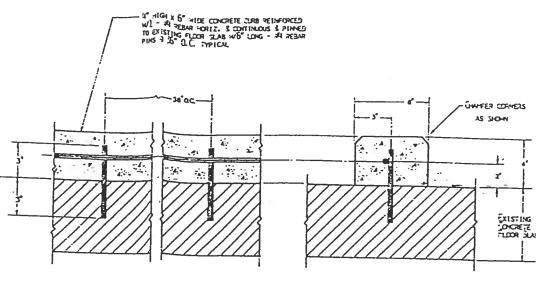


SECTION C-2: SLAB CONSTRUCTION DETAIL



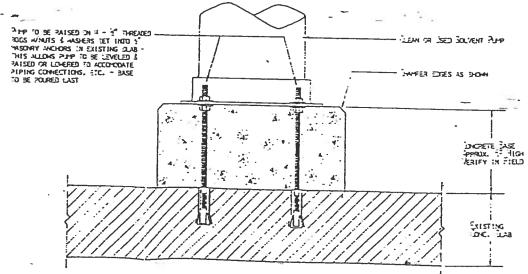
CONSTRUCTION DETAIL

TOTE: FOR APEAS WE'RE CIRBLYS IS TO BE INSTALLED FLOOR DARFACE TO BE COMMON A VIEW WOLLD SOLUTION THE PREPARATION FOR EPOXY MORLING ACENT. TO BE APPRICED WITHOUT CALLEY OR APPROVED SOUND AS APPRICED PRICE TO BE APPRICED FROM TO BE APPRICED PRICE TO



DETAIL D-1: CURB CONSTRUCTION

SCALE: 3' - 1-0'



DETAIL D-2: PUMP BASE CONSTRUCTION

#### GENERAL NOTES

- THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORP. ANY REPRODUCTION DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-KLEEN OR US CAFETY-KLEEN MAY ACREE IN ARTITING.
- 2) HIS JOHN'S THEORETES HETT-LIEB TRAVINGS CITYLO.
- (3) SEE INDIVIDUAL MERVICE CENTER PLANS FOR LOCATIONS OF THESE DETAILS
- (4) CONCRETE TO OBTAIN \$200 IST STRENGTH IN 28 DAYS
- 1)(5) ALL ITEMS 41TH SAFETY-CLEEN \*ART NO. REFERENCES 4TH BE 102PLIED 12 CONTRACTOR.

2) : VERT. BAR SPACING WAS 48" WLJ

A ADDED MOTE S.A PIPE STRAIMER WLJ

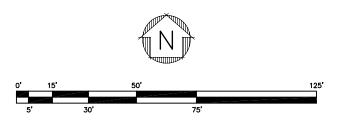
REV DESCRIPTION BT

301814718811 SOPTI

TYPICAL CONCRETE AS INC.

CONSTRUCTION DETAILS—

## 300'-0" -CHAIN-LINK FENCE (TYP.) SHED 10x12 DNS) RETURN/ FILL WAREHOUSE OFFICE BOLLARDS ROAD NS(D) D NS LCURB (TYP.) CONC.



#### GENERAL NOTES

- 1.) NON-PERMITTED TANKS & EQUIPMENT MAY CHANGE
- 2.) ACTUAL EMERGENCY EQUIPMENT LOCATION MAY VARY DUE TO MAINTENANCE/ UPKEEP OF FACILITY.

#### LEGEND

- R RESPIRATORS
- EW EYE WASH
- Š SORBENTS
- T TELEPHONE
- (FE) FIRE EXTINGUISHER (TYP. ABC)
- FA FIRST AID STATION
- 0 DANGER SIGN
- (NS)
- EMERGENCY NUMBER

#### TANK LEGEND

NO.	TANK VOLUME	TANK CONTENTS	REMARKS				
1	15,000 USG	USED MINERAL SPIRITS	10'-6"Ø FLAT BOTTOM VERTICAL STORAGE TANK				
2	15,000 USG	CLEAN 105° MINERAL SPIRITS	10'-6"Ø FLAT BOTTOM VERTICAL STORAGE TANK				
3	12,000 USG	CLEAN 150* MINERAL SPIRITS	8'-0"Ø HORIZONTAL STORAGE TANK				

#### **REVISIONS**

NO.	DESCRIPTION	BY	СНК	APPR	DATE
A	RELEASED TO CL FOR PERMIT MOD.	мвн	KJM	WEY/CL	07269
В	MOVED NORTH GATE AND EXTEND NORTH FENCE	JKM	CL		111201
С	REVISE TO SHOW CURRENT CONDITIONS	JEK	RS	RS	05070
D	REMOVE RECYCLE SYSTEM	JEK	RS	RS	121510

SITE PLAN SHOWING EMERGENCY EQUIPMENT

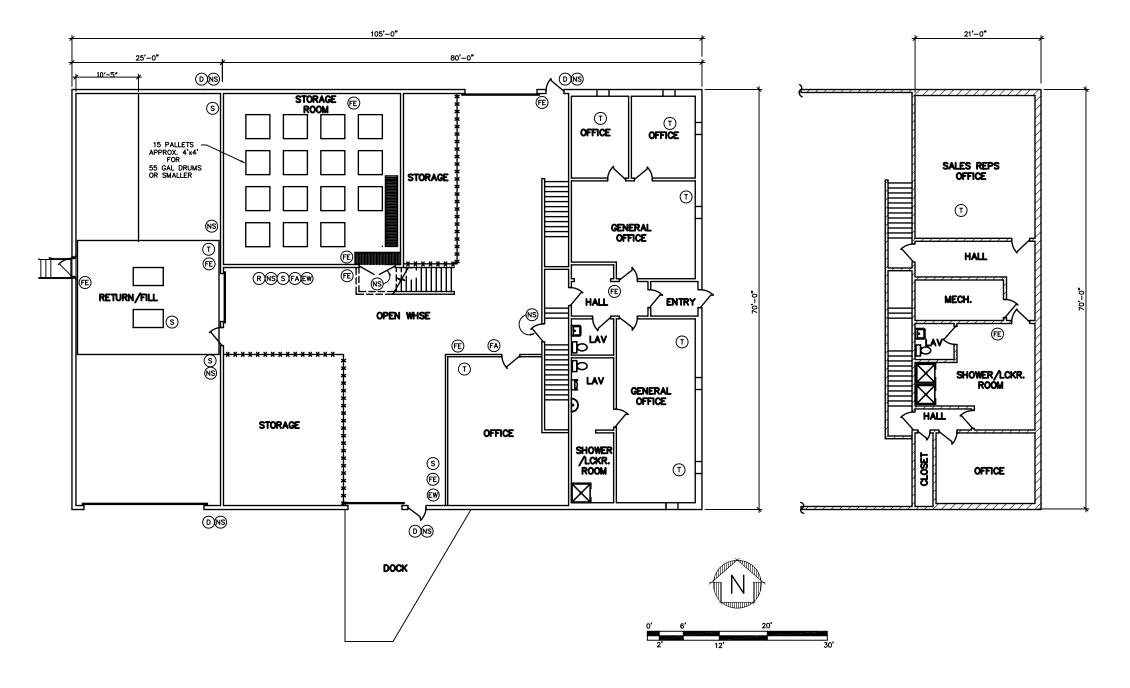


SAFETY-KLEEN SYSTEMS, INC. 8400 LEDACY DR. CLUSTER I BLDG. 3 PLANO, TX.78024 PROJE 800-803-8740

SCALE
1"=20'-0"
MBH
CHKD
APPROVED
OPERATIONS
SERVICE CENTER LOCATION
SALT LAKE CITY, UT
SCHOOL OPERATIONS
716601—QJPB002

#### OFFICE, WHSE, & R/F FLOOR PLAN

#### MEZZANINE FLOOR PLAN



### ATTACHMENT 3

G	REMOVE RECYCLE AREA	JEK	RS	RS	121510			
F	SHOW ASBUILT CONDITIONS	JEK	RS	RS	071007	1		
Ε	ADD RECYCLE SYSTEM AREA	JEK	RS	RS	6/17/07			
D	ADD OFFICE AND REVISED EQP. LOCATIONS	JEK	RS	RS	5/03/07			
С	ADDED 15 PALLETS IN STORAGE ROOM	RDK	KJM	VEY/CL	2/15/97	1		
В	ADDED EGRESS DOOR IN R/F RELEASED TO CL FOR PERMIT MOD	мвн	КЈМ	WEY/CL	072696	4		
A	NEW RELEASE	мвн	КЈМ	VEY/CL	052394	S		
NO.	DESCRIPTION	BY	СНК	APPR	DATE	s		
REVISIONS								

#### GENERAL NOTES

- 1.) NON-PERMITTED AREAS MAY CHANGE.
- ACTUAL EQUIPMENT LOCATION MAY VARY DUE TO CONSTRUCTION, MAINTENANCE AND/OR UPKEEP AT THE FACILITY.

#### **LEGEND**

- RESPIRATORS
- €W EYE WASH
- S ABSORBENTS
- T TELEPHONE
- (FE) FIRE EXTINGUISHER
- (FA) FIRST AID STATION
- **(D)** DANGER SIGN
- (NS) NO SMOKING SIGN

TITLE OFFICE, WHSE, & R/F FLOOR PLAN SHOWING EMERGENCY EQUIPMENT LOCATIONS - EXISTING

SAFETY-KLEEN SYSTEMS, INC.

5400 LEGACY DR. CLUSTER II BLDG. 3 PLAND, TX. 75024 800-669-5740 DATE 05-23-94

SALT LAKE CITY, UT 716601-QJPB700 G