ATTACHMENT 10

MANAGEMENT OF WASTE IN CONTAINMENT BUILDING

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1.0 Waste to be Managed

Clean Harbors Clive, LLC ("Clive") accepts for management at the facility waste identified in Condition 2.C.1 of the Permit. In addition, Clive may also accept for management industrial waste, household hazardous waste, site generated waste, and regulated and non-regulated PCB waste. Management of all waste at the Clive facility is subject to the conditions of this permit. All waste streams to be managed in the Containment Buildingwill be non-containerized bulk solids without free liquids that haveless than 500 ppmwvolatile organic compound (VOC) emissions, as determined byEPA Method 21 and the Waste Analysis Plan.

2.0 Design and Operating Requirements of the Containment Building

As indicated in Section 1.0, Clive may operate the Unit 106 Building as a Containment Building. The types of waste or materials being handled by Clive are not expected to decompose. Additionally, waste or material will undergo testing prior to being added to the existing waste in the Containment Building in order to assure compatibility. The design of the enclosed portion of Unit 106 Building, as specified in Section 1.4.4 of Attachment 8, Container Management, of the RCRA Part B permit, has perimeter curbs that prevent surface water run-on into the containment areas. In addition, the existing building and doors will prevent dispersal of the waste by wind.

3.0 Containment Building Management Practices

Clive will follow the acceptance procedures identified in Attachment 1, the Waste Analysis Plan, of the Permit. The building does not have air controls to manage volatile organic compounds and, as a result, the waste to be stored in the Containment Building is limited to those with a maximum concentration of less than 500 ppmw VOCs. To assure that waste meets this criteria all containers of waste to be placed in the Containment Building will have the headspace tested with a photo ionizing detector (PID) prior to acceptance in order to assure thatthe VOCs concentrations are less than 500 ppmw. The monitoring will be done in accordance with EPA Method 21 and as specified in R315-264-1063(b)(1) (40CFR 60 Appendix A, by reference)..The PID will be calibrated and maintained according to the manufacture's recommendations.

For offloading intothe Containment Building,trucks will enter through the south door of the enclosed portion of Subunit 1 of Unit 106.Waste storagewill start on the south end of the building, and continue to the north, as the quantity of stored wasteincreases. Trucks will exit the building through the northtruck door. Prior to exiting the building,the container and the transport vehicle shall be inspected to assure that both are clean prior to leaving. While on the outside portion of Subunit 1, the wheels will be inspected to assure that no waste is tracked out of the Containment Building. All inspections will be documented in accordance with Condition 4.G.10 of the Permit. If necessary, a powerwasher or shovel or broom, which will be kept on the containment pad north of the building, will be used to clean off the wheels prior to the truck leaving the containment.The rinse waters will be collected at the end of the shift it was generated

and stored in the frack tank currently used to store precipitation that accumulates in the containment areas. This water,and any generated sediment,would then be shipped offsite as hazardous waste, in accordance with Condition 4.H.2 of the Permit, for management at a permitted facility. A front end loader and brooms will be utilized in the Containment Buildingto prevent the wastefrom spreading out of the area. The south door will remain closed at all times except when waste is being added or removed from the Containment Building.

To remove waste from theContainment Building,a front end loader,or equivalent, will be used to scoop material from the north end of the pile of waste, which will then be placed into end-dump trailers or other bulk solid container for transportation off-site. The transport vehicle, and container if used, will be inspected for waste on the exterior prior to exiting the building. Outside of the building, the trailer will be inspected again. In addition, the tires will be inspected as well to assure that waste is not tracked out of the building. The wheels will be decontaminated in the same manner as the trucks that are being offloaded, as necessary. All inspections will be documented in accordance with Condition 4.G.10 of the permit.

At a minimum, a ten-footwide truck lane on the west side of the interior of the Containment Building will be maintained. "Jersey"-style barricades will be located between the waste and the truck lane to keep waste out of the truck lane. The barricade shall extend a minimum of five feet beyond the northern most point of the waste.Waste shall not exceed six inches in height where the waste contacts the barricade and the secondary containment wall within the building in accordance with Condition 4.G.7.i of the Permit.

A forty (40) foot area at the north end of the Containment Building will be kept clear of material in order for there to be room to stage and operate equipment. The area around the buildings containment will be inspected at least once a day to assure that waste has not migrated from the containment area, with corrective actions being taken immediately if the inspections indicate that it has. The results of the inspections shall be incorporated into the operating record.

Prior to bringing a vehicle into the building, the facility shall assure the truck lane and the area north of the stored waste are clean to ensure that waste will not contact the tires of the transport vehicle. Clive willalso assure the floor is clean a minimum of five feet beyond where the transport vehicle will park to load or off load.

In order to discontinue the use of the Containment Building and return the building back to acontainer storage unit, all waste shall be removed from the building and the containment area decontaminated in accordance with the Closure Plan (Attachment 7).The rinseate, generated during the final powerwashing procedure, must meet the standards specified in Table 1.3 of the Closure Plan (Attachment 7). Further, the requirements of Permit Condition 4.I.2 shall be complied with prior to returning the building to container storage service.

The Permittee is allowed to store waste in polypropylene sacks in the Containment Building. When waste is received in bags that are 9 feet long, 9 feet wide, and 3.0 feethigh, the maximum capacity of waste in the Containment Building is 527 polypropylene bags (650,000 gallons) and the maximum height of the waste shall not exceed 17 feet. Waste in different size sacks may be stored in the Containment Building contingent upon approval by the Director.

When polypropylene sacks are stored in the building, the truck lane can be used for the storage of waste. In addition, waste can be stored in the northern 40 feet of the Containment Building and the sacks can be placed against the curbs of the secondary containment. When operating in this mode, inspection forms verifying cleanliness of the transport vehicle are not necessary. Any spill documented will be cleaned up according to this Permit.

Access to the building for the placing and removal of sacks can be through both the north and south truck doors. The doors can remain open during the movement (moving waste to and from a railcar or truck trailer) of waste and will be closed afterwards.

5.0 Waste Tracking

Upon arrival at the facility, a unique identifying number shall be assigned to each load of waste that will be stored in the Containment Building. This number will be used to track the location at the facility and all data associated with the waste in the container.

Tracking of waste into and out of the Containment Buildingwill involve a “last in, first out” tracking system where the loads will be tracked out beginning with the last load to go in. The waste inventory shall be updated at the end of the shift that the waste was received or shipped from the building.

In addition to tracking the loads of waste in the Containment Building, Clive shall track the volume of waste in the containment area. The volume will be updated in the operating record at the end of the shift when waste is added or removed from the waste in the Containment Building. The volume of waste in the containment area shall not exceed 2,583 cubic yards.

Waste tracking for the polypropylene sacks is like that of roll-boxes. Each sack has a unique identifying number assigned to it and will be tracked into and out of the building using this number.