Division of Waste Management and Radiation Control

USED OIL PROCESSOR PERMIT

Permittee Name:	**Pacific West, LLC**
~~**Permittee**~~ **Corporate Mailing Address:**	1515 West 2200 South, Suite C Salt Lake City, UT 84119
~~**Permittee**~~ **Corporate Phone Number:**	(801) 972-2727
~~**Permittee**~~ **Environmental Contact:**	Dustin Hall, Director of Operations/Principal ~~Michael Forrest, President~~ (801) 972-2727 office (801) 514-3623 ~~510-7300~~ cell Email: dhall~~mforest~~@pacwestllc.com
Facility Processor Address:	5751 North Droubay Road Erda, Utah 84074
Facility Contact:	Devi Pratt, Facility Manager ~~Brent Cole~~ (435) 241-0025 ~~(385) 290-0358~~ cell Email: lpratt~~bcole~~@pacwestllc.com
Type of Permit:	**Used Oil Processor Permit**
Original Issuance Date:	**March 5, 2018**
Permit #:	**UOP-0178**
EPA ID#:	**UTR000010165**

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Signature: _____ **Date:** _____

Ty L. Howard~~Scott T. Anderson~~, Director
Division of Waste Management and Radiation Control

I.A. Effect of Permit

I.A.1. Pacific West, LLC (hereafter referred to as "Permittee") is hereby authorized to operate as a Used Oil Processor located at 5751 North Droubay Road, Erda, Utah 84074 (Attachment 1 – Facility Site Plan Map**).** The Permittee shall operate in accordance with all applicable requirements of R315-15 of the Utah Administrative Code (UAC) (Rules) and of the Used Oil Management Act (the Act) §19-6-701 et. seq. Utah Code and this Permit.

I.A.2. This permit shall be effective for a term not to exceed ten years in accordance with the requirements of R315-15-15 UAC.

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

I.A.4. It shall not constitute a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permittee's business activity in order to maintain compliance with the conditions of this Permit and its attachments.

I.B. Permit Revocation

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

I.C. Permit Modification

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

I.C.2. Modifications in operational activities include any expansion of the facility beyond the areas designated, alteration of processing operational parameters, changes in the type or number of storage tanks, piping, other equipment, and changes to the Emergency Response and Contingency plan. The Director may require the Permittee to submit additional information when reviewing permit modification requests to ensure the safe handling of used oil at the processing facility in accordance with Utah Code §19-6-710(3)(b)(xii).

I.C.3. The Director may modify this Permit as necessary to protect human health and the environment or because of statutory or regulatory changes.

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

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I.D. Emergency Controls Systems and Facility Maintenance

I.D.1. The Permittee shall maintain and operate the Processor facility to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, ground, soil, surface and groundwater and sewer systems that could threaten human health and the environment.

I.D.2. The Permittee shall have communication systems, fire alarms and fire suppression equipment in place and operational at the facility, as well as arrangements with local emergency response teams (i.e. fire, police, and hospital) in accordance with R315-15-5.3 UAC.

I.D.3. The Permittee shall have written documentation of inspections, conducted weekly, of the tank farm, secondary containment, and emergency equipment (e.g. fire extinguishers and spill materials) in accordance with Attachment 2 (Facility Inspections).

I.D.3.a. Weekly inspection documents shall include inspector's name, date, areas inspected, any problems identified, and the subsequent actions taken by the facility to maintain system integrity.

I.D.4. To prevent access by unauthorized persons or vehicles during hours when the facility is closed and authorized personnel are not present, the Permittee shall secure the facility as specified in Attachment 3 (Emergency Controls and Contingency Plan).

I.D.6. The Permittee shall maintain spill kits and fire extinguishers as specified in Attachment 3 (Emergency Controls and Contingency Plan). Locations of the spill kits and fire extinguishers shall be identified on the Facility Site Plan Map in Attachment 1.

I.D.7. The Permittee shall maintain secondary containment systems for container storage area and the used oil tank farm in accordance with R315-15-5.5(c) UAC, to prevent contamination of soils, surface waters, and groundwater at the facility.

I.D.7.1. Within 24 hours of discovery of used oil, stormwater or other liquids that may accumulate in the tank farm secondary containment system shall be removed and properly managed by the Permittee to prevent the possible migration of these liquids to soil, ground, or surface waters.

I.E. Emergency Controls and Contingency Plan

I.E.1. The Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are necessary to protect human health and the environment. In the event of a release of used oil, the Permittee shall immediately take appropriate actions in accordance with the Permittee's Emergency Controls and Contingency Plan (Attachment 3), and R315-15-9 UAC.

I.E.2. The Permittee shall keep a copy of the current Emergency Controls and Contingency Plan (Attachment 3) on site until facility closure.

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I.E.3. The Permittee shall provide a current copy to local police, fire departments, hospitals and State local emergency response teams that may be called upon during an emergency in accordance with R315-15-5.3(b)(3) UAC.

I.E.4. The Permittee shall implement the Emergency Controls and Contingency Plan (Attachment 3) whenever there is an imminent or an actual emergency.

I.E.5. The Permittee shall notify the Utah Department of Environmental Quality 24-hour Answering Service, (801) 536-4123, for used oil releases exceeding 25 gallons or for smaller releases that pose a potential threat to human health or the environment in accordance with R315-15-9.1 UAC.

I.E.6. In accordance with R315-15-9.4 UAC, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

I.E.7. All information required by R315-15-9.4 UAC shall be included in the report. The report shall also include a description of actions taken by the Permittee to prevent future spills.

I.E.8. The Permittee shall notify the Division within 24 hours of any used oil found at the facility with PCB concentrations ≥ 2 ppm. PCB contaminated used oil (≥ 2 ppm) shall not be diluted or blended to avoid any provision of Federal or State environmental regulation.

I.F. Recordkeeping

I.F.1. The Permittee shall maintain all used oil records (hard copy or electronic format) required by the Rules and Permit Conditions. All records shall be readily accessible for inspection by authorized representatives of the Director.

I.F.2. Training

I.F.2.a. The Permittee shall maintain employee training records, required by the Rules and this Permit, at 5751 North Droubay Road, Erda, Utah, or at the Permittee's corporate headquarters located at 1515 West 2200 South, Suite C, Salt Lake City, Utah.

I.F.2.b. Training records are required to be maintained for a minimum of three years and be easily assessable during inspections.

I.F.3. Financial Assurance

I.F.2.a. The Permittee shall maintain financial assurance documentation required by the Rules and this Permit, at 5751 North Droubay Road, Erda, Utah, or at the Permittee's corporate headquarters located at 1515 West 2200 South, Suite C, Salt Lake City, Utah.

I.F.3. Used Oil Storage

I.F.3.a. The Permittee's shall record and maintain a used oil tank storage log sheet (Attachment 9) for each of the tanks listed in Table II.C. Tank log sheets shall document the operator conducting the operation (signature), date and time of the operation, the volume of used oil placed into or taken out of the tank (includes inter-

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tank transfers) and the halogen concentration of used oil received by the facility. In addition, tank records shall document tank sampling events, which includes the date sampled, samplers' initials, facility's sample number, the laboratory sample identification number and if the used oil sample met the specification requirements of the Rules.

I.F.3.b. The Permittee shall maintain a container tracking record (written or electronic) of the used oil containers accepted at the facility. The container tracking record shall include the date accepted, container type, quantity, volume of oil, the date oil in the containers was transferred into bulk storage tanks or the date the container was shipped from the facility.

I.F.3.c. Tank log sheets and container tracking records shall be maintained, stored and available for inspection at this facility for a minimum of three years.

I.F.4. Analytical Data

I.F.4.a. All sampling and associated analytical records for used oil or wastes sent for disposal, shall be maintained in the Permittee's operations record at this facility until final closure of the facility.

I.F.5. Incident Reports

I.F.5.a. All incident reports for spills or emergencies that require implementation of the facility's Emergency Control and Contingency Plan (Attachment 3) shall be maintained in the Permittee's operations record at this facility until final closure of the facility.

I.F.6. Wastewater and Stormwater

I.F.6.a. The Permittee shall record the volume (mass balance) of wastewater (includes stormwater) received at or generated at the facility and the proper disposal of this wastewater and these records shall be maintained in the Permittee's operations record at this facility until final closure of the facility.

I.F.6.b. The Permittee shall maintain a log sheet (electronic or paper) which records the volume of stormwater or other liquids removed from the container storage area sump and the Tank Farm's secondary containment area, the date of discovery, the date of removal, name of operator, and how the facility disposed of these liquids. These records shall be maintained, stored and available for inspection at this facility for a minimum of three years.

I.F.7. Inspections

I.F.7.a. All facility inspection records will be conducted in accordance Attachment 2 (Facility Inspections) and inspection records shall be maintained, stored and available for inspection at this facility for a minimum of three years.

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I.F.8. Waste Disposal

I.F.8.1. The Permittee shall maintain records that document the proper characterization and disposal of any solid wastes generated at the facility that are subject the hazardous waste management requirements of R315-260 through 266, 268, 270, and 273 at the facility for a minimum of three years.

I.G. Sampling and Analysis Plan

I.G.1. The Permittee shall follow all sampling and analytical procedure requirement in Permit Condition II.E, when conducting used oil sampling and analytical testing to meet the requirements of R315-15-5.6 UAC and this Permit.

I.H. Prohibitions

I.H.1. Except as authorized by the Director, a person may not place, discard, or otherwise dispose of used oil in any of the following manners:

I.H.2. Used oil shall not be managed in surface impoundments or waste piles unless the units are subject to regulation under R315-264 or R315-265 UAC.

I.H.3. The use of used oil as a dust suppressant, weed suppressant, or for road oiling or other similar use is prohibited. Any disposal of used oil on the ground is prohibited under Utah Code Annotated 19-6-706(1)(a)(iii).

I.H.4. A person may not mix or commingle used oil with the following substances, except as incidental to the normal course of processing, mechanical, or industrial operations:

I.H.4.a. Solid waste that is to be disposed of in any solid waste treatment, storage, or disposal facility, except as authorized by the Director; or

I.H.4.b. Any hazardous waste so the resulting mixture may not be recycled or used for other beneficial purpose as authorized under R315-15 UAC.

I.H.5. Used oil shall not be disposed in a solid waste treatment, storage, or disposal facility, except for the disposal of hazardous used oil as authorized under R315-261 UAC.

I.H.6. Used oil shall not be disposed in sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or any body of water.

I.H.7. The Permittee shall not accept used oil for storage with a PCB concentration ≥ 2 mg/kg (ppm).

I.H.7.a. Used oil shall not be stored in containers/tanks or transferred in auxiliary equipment (e.g. piping, transfer hose or pumps) that have been contaminated with PCB's at concentrations ≥ 2 ppm unless decontaminated in accordance with 40 CFR §761 Subpart S.

I.H.8. Used oil that has been mixed with hazardous waste as defined by R315-261 UAC or PCBs as defined by R315-301-2(53) UAC shall no longer be managed as used oil and shall be subject to applicable hazardous waste and PCB-contaminated waste Rules.

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I.H.8.a. Used oil shall not be stored in tanks, containers or piping that have previously stored hazardous waste, unless the tanks, containers and piping are emptied as described in R315-261-7 UAC, prior to storing or transferring used oil.

I.I. ~~Solid~~ Waste Characterization and Disposal

I.I.1. The Permittee shall properly characterize solid wastes (e.g. used oil, used oil related wastes) or used oil sent for disposal to determine if the wastes are hazardous or non-hazardous in accordance with R315-261 UAC and R315-15-8 UAC. The wastes shall be sent to an appropriate facility permitted to handle the type of waste generated.

I.I.2. The Permittee shall manage and dispose of the PCB-contaminated used oil ≥ 2 ppm in accordance with R315-15-18 UAC and 40 CFR §761, as applicable. Used oil shall not be diluted to avoid any provision of any Federal or State environmental regulation.

I.J. Liability and Financial Assurance Requirements

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

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

I.J.3. The Permittee shall receive written approval from the Director for; 1) any changes in the extent, type (e.g., mechanism, insurance carrier or financial institution); 2) the amount of the environmental pollution legal liability; and 3) the financial assurance mechanism for coverage of physical or operational conditions at the facility that change the nature and extent of cleanup and closure costs prior to implementation of these changes.

I.K. Cleanup and Closure

I.K.1. The Permittee shall, as required by R315-15-11 UAC and this Permit, remove all used oil and used oil residues from the site of operation and return the site to a post-operational land use in a manner that:

I.K.1.a. Minimizes the need for further maintenance;

I.K.1.b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of used oil, used oil constituents, leachate, contaminated run-off, or used oil decomposition products to the ground or surface waters, or to the atmosphere.

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I.K.2. The Permittee shall be responsible for cleanup of any used oil or other contamination found at the facility including contamination that has migrated beyond the facility property boundaries in accordance with R315-15-11(d) UAC.

I.K.3. The Permittee shall submit to the Director for approval, prior to initiation of closure activities, a permit modification request that updates the facility's closure cost estimate and the facility closure plan in Attachment 8 of this Permit.

I.K.4. The Permittee shall update its closure plan cost estimates and provide the update estimated to the Director, in writing, within 60 days following a facility modification that causes an increase in the amount of the financial responsibility required under R315-15-10 of the Utah Administrative Code. Within 30 days of the Director's written approval of a permit modification for the cleanup and closure plan that would result in an increase cost estimate, the owner or operator shall provide to the Director the information specified in R315-15-11.2(b)(2) of the Utah Administrative Code.

I.K.5. The Permittee shall initiate closure of the facility within 90 days after the Permittee receives the final volume of used oil or after the Director revokes the Permittee's Processor Permit in accordance with the requirements of R315-15-11.3 UAC and this Permit.

I.K.6. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, a certification signed by the Permittee and a Utah-registered professional engineer (independent) that the facility has been closed in accordance with R315-15-11.4 UAC and the specifications of the final closure plan.

I.K.7. The Director may require the Permittee to perform additional site investigation (e.g., soil or water samples) and remediation activities to verify that cleanup and closure is completed according to R315-15 UAC.

I.L. Used Oil Training

I.L.1. The Permittee shall train and document the training of employees in the proper handling and management of used oil in accordance with the applicable requirements of R315-15 UAC and Permit Conditions I.L.2 through I.L.5.

I.L.2. The Permittee shall have a written used oil training course syllabus that documents that employees are trained to identify used oil, used oil handling and storage requirements, emergency spill response, spill reporting, proper sample collection and analytical method procedures, solid waste characterization and disposal, personal safety, and all used oil recordkeeping requirements this Permit.

I.L.3. A new employee may not manage used oil without a trained employee present until their used oil training is completed.

I.L.4. The Permittee shall provide, at a minimum, an annual used oil-training refresher course for employees handling used oil. Additional training is required when the Permittee changes used oil-handling operational procedures at the facility.

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I.L.5. Permittee shall have the course instructor and the employees sign and date a used oil training course attendance record to document used oil training.

I.M. Used Oil Handler Certificate

I.M.1. In accordance with R315-15-5.9 UAC, the Permittee shall not operate as a used oil processor without obtaining annually a Used Oil Handler Certificate from the Director. The Permittee shall pay a used oil handler fee, pursuant to Utah Code Section 63J-1-504, by December 31 of each calendar year to receive certification for the upcoming calendar year.

I.N. Inspection and Inspection Access

I.N.1. Any duly authorized representative of the Director may have access to and the right to copy any records relating to used oil activities. Authorized officers may use any reasonable means to document inspection activities (e.g. photographic, videotape or electronic). In addition, the authorized representative may collect soil, ground water or surface water samples to evaluate the impact of the facility's used oil operations.

I.N.2. Failure to allow reasonable access to the property by authorized employees is a "denial of access" and may be grounds for enforcement action or permit revocation.

I.O. Annual Report

I.O.1. As required by R315-15-13.5 UAC, the Permittee shall prepare and submit an accurate Processor Annual Report (UO 004 Form) to the Director by March 1 of the following year.

I.P. Other Laws

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

I.Q. Enforceability

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

I.R. Effective Date

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

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II.A. General Operations

II.A.1. The Permittee is authorized to store, and process used oil (via gravity separation only) in accordance with R315-15-5 UAC at 5751 North Droubay Road, Erda, Utah 84074.

II.A.2. The Permittee is authorized to store a maximum of 17,400 gallons of used oil in tanks (bulk storage) and containers described in Table II.C.

II.A.3. The Permittee shall maintain a current process and instrument diagram (PID), certified by a Utah professional engineer in Attachment 4 (PID Diagram.).

II.A.4. The Permittee shall only store used oil in tanks subject to regulations under R315-265 UAC or R315-264 UAC and maintain tanks, any associated piping, pumps, and valves in good operational condition.

II.A.5. The Permittee shall verify, at the time of acceptance, that the transporter delivering the used oil has recorded the halogen content of the used oil on the shipping documents.

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

II.A.7. If the transporter has not documented the halogen content on the shipping records, then the Permittee shall determine the halogen content of the shipment of used oil received at the facility, prior to acceptance.

II.A.7.a. The Permittee shall determine the halogen content by collecting a representative sample, when applicable, in accordance with Condition II.E and Attachment 5 (Used Oil Sample Collection Procedures), by screening the used oil sample for halogens, or by submitting the sample to a Utah-certified laboratory for analysis in accordance with the analytical requirements of Attachment 6 (Analysis Plan).

II.A.7.b. The Permittee shall then record the results of the halogen testing of any untested used oil received at the facility in the facility operating record.

II.A.8. The Permittee shall only receive used oil from, or transfer used oil to a transporter with a valid Utah Used Oil Transporter Permit issued by the Director.

II.A.9. Used oil recovered from oily water shall be managed as used oil in accordance with the Rules and this Permit.

II.C. Used Oil Storage

II.C.1. The Permittee shall only store used oil in the tanks and containers specified in Table II.C.

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Table II.C: Used Oil Storage Tanks and Container Storage

Tank Containers	Capacity (gallons)	Type	Location
1	4000	Poly	Tank Farm -Secondary Containment Area
2	4000	Poly	Tank Farm -Secondary Containment Area
3	4000	Poly	Tank Farm -Secondary Containment Area
4	4200**	Poly	Tank Farm -Secondary Containment Area
Containers	1200	Various Drums/Totes (poly/steel)	Container Storage Area – Concrete Pad adjacent to western edge of Tank Farm
Maximum facility used oil storage capacity = 17,400 gallons ** Maximum volume allowed in tank			

II.C.2. The Permittee shall conduct inspections of used oil storage tanks and the tank farm secondary containment system in accordance with Attachment 2, Appendix 1 (Tank Farm and Vehicle Loading/Unloading Area Weekly Inspection Form) of this Permit. The Permittee shall record the inspector's name, the time and date of the inspection and the condition of the tanks and secondary containment systems. The Permittee shall document in the inspection log, major repairs (at time of inspection) any issues discovered during the inspections (e.g. leaking tanks or water accumulation in secondary containment area) and any subsequent actions taken by the Permittee to resolve these issues. The Permittee shall document when the corrective action was completed.

II.C.3. The Permittee shall label the used oil storage tanks with the words "Used Oil."

II.C.4. The Permittee shall keep containers closed except when adding or removing used oil.

II.D. Vehicle Loading and Unloading Requirements

II.D.1. The Permittee shall ensure that operations involving the loading or unloading of used oil are conducted in accordance with Attachment 7 (Used oil Loading and Unloading Procedures).

II.E. Used Oil Sampling and Analysis

II.E.1. The Permittee shall ensure a representative sample is collected from the facility's used oil storage tanks in accordance with Attachment 5 (Sample Collection Procedures) and that these samples are analyzed in accordance with the requirements of Attachment 6 (Analysis Plan).

II.E.2. The Permittee shall ensure a representative sample is collected from any containerized waste (solids and liquids) generated at the facility from spill clean-up activities in accordance with Attachment 5 (Sample Collection Procedures) and that

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these samples are analyzed in accordance with the requirements of Attachment 6 (Analysis Plan).

II.E.3. The Permittee shall train employees on the sample collection procedures in Attachment 5 and the analytical requirements in Attachment 6 for any collected samples.

II.F. Emergency Spill Response and Remediation

II.F.1. In accordance with R315-15-9.1 UAC, the person responsible for the spill shall immediately take appropriate action to minimize the threat to human health and the environment. The Permittee shall notify the DEQ Hotline at (801) 536-4123 if the spill is greater than 25 gallons or smaller spills if it poses a threat to human health or the environment (Attachment 3 – Emergency Controls and Contingency Plan).

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

II.F.3. The Permittee is responsible for the material released and shall recover oil and remediate any residue from the impacted soils, water, or other property, or take any other actions as required by the Director until there is no longer a hazard to human health or the environment.

II.F.4. Once the material is containerized, a waste determination shall be made to determine the material's disposition.

II.F.5. The Director may require additional cleanup action to protect human health or the environment.

II.F.6. All costs associated with the cleanup shall be at the expense of the Permittee.

II.F.7. The Permittee shall maintain spill response materials and equipment as required in Attachment 3. Spill materials shall contain, at a minimum, the equipment listed in Table E.1 of Attachment 3.

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

II.F.9. In accordance with R315-15-9.4 UAC, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

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Attachment 1

Facility Site Map

Attachment 2

Facility Inspections

A. Inspections

A.1. The Permittee shall document weekly inspections of the facility's tank farm, the container and tank secondary containment areas (including sump), the vehicle loading and unloading area, and emergency response and safety equipment.

A.2. The Permittee's facility manager is responsible for the implementation of the inspection program.

A.3. Operators shall conduct weekly inspections using the inspection Form B of Attachment 2 (or equivalent) of the tanks, containers, sump, the tank farm secondary containment area, vehicle load/unload area and any other areas where used oil operations are conducted.

A.3.a. Inspectors are required to document the date and time of inspection, name of the inspector, the status of each inspected item. Inspectors will document any deficiencies on the inspection sheet and report the deficient condition to the facility manager. The inspectors shall document the date that the deficiency was corrected on the inspection sheet. The facility manager will verify (written documentation) that any deficiencies identified during the inspection are corrected in a timely manner.

A.2. Inspectors shall receive training to enable them to identify any problems associated with the used oil storage areas or emergency equipment.

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Attachment 2 - Appendix 1

Pacific West, LLC – Used Oil Processor Facility – UOP-0178 Weekly Inspection Form				
Date: _____ Time: _____		Inspector's Signature: _____		
Item	Inspection Elements	Status "OK"		Description Deficiencies (date corrected)
		Yes	No	
Tanks/Secondary Containment	Tanks, valves, and transfer hoses in good condition and not leaking?			
	Tanks are properly labeled, and valves locked?			
	Tank Farm secondary containment liner in good condition?			
	Any liquids accumulated in the secondary containment?			
Container Storage Area and Sump	Containers properly labeled, in good condition, and not leaking?			
	Any liquids accumulated in the container storage area sump?			
Spill Kits	Spill Kits are stocked with required clean up materials.			
Fire Extinguishers	Fire extinguisher are in good condition and have current inspection tag.			
Communication	Employees have cell phones to report problems.			
Spills	Any spills of used oil found?			
Comments:				

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Attachment 3

Emergency Controls and Contingency Plan

A. General

A.1. This Emergency Control and Contingency Plan is designed in accordance with the requirements R315-15-5.3 UAC to implement a contingency plan and emergency procedures including the appropriate equipment required to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water. This plan also establishes activities required by employees of the Permittee to mitigate such discharges (i.e., countermeasures) should they occur.

B. Facility Description and Operations

B.1. The facility stores used oil collected in Utah and surrounding states. There is no active processing of used oil that occurs at this facility. The used oil is stored in tanks and containers. Sufficient secondary containment is provided in all storage areas per requirements of R315-15-5 UAC.

C. Site Security

C.1. The facility shall lock access gates and padlock valves on tanks when no Pacific West personnel are at the facility.

D. Commitment of Manpower and Resources

D.1. The facility shall have an emergency coordinator at the facility or on call that is available to respond to a facility emergency immediately. The primary and secondary emergency coordinators are listed in Table D.1 below. The emergency coordinators shall be thoroughly familiar with all aspects of the facility's emergency control and contingency plan, facility operations, and have the authority to commit the resources needed to carry out the contingency plan. In their absence, all facility personnel will evacuate, and the most senior employee will contact the emergency coordinators.

Table D.1: Facility Emergency Coordinators and Contact Information

Emergency Coordinators	Title	Contact Information
Dustin Hall	Director of Operations	(801) -514-3623 cell (801) 972-2727 office Email: dhall@pacwestllc.com
Levi Pratt	Facility Manager	(435) 241-0025 cell Email: lpratt@pacwestllc.com

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E. Facility Emergency Equipment

E.1. The facility shall maintain emergency response material and equipment listed in Table E.1 below. All emergency equipment shall be inspected and maintained as necessary to assure its proper operation in time of emergency.

Table E.1: Emergency Spill Response Materials and Equipment

Physical Description	Location	Use
Spill Kit Drums (2): • Floor dry (1 bag) • Spill pads (20)	Tank farm secondary containment area and container storage area.	Emergency response and spill cleanup.
Additional Spill Materials: • Boom spill socks (4) (Diameter 3" or more & a minimum of 30') • 8 bags of floor dry • 5 packages of spill pads for restocking spill kits	Facility Shop	Emergency response and spill cleanup.
Fire Extinguishers (2)	• Mounted on post adjacent to tank farm • Container storage/vehicle loading/unloading area.	Fire control
First Aid Kit (1- large)	Facility office/shop	Treat minor injuries
Tools: • Shovels (2) • Broom (2)	Shop	Emergency response and spill cleanup.
Recovery Drums (4)	Shop	Emergency response and spill clean up
Personal Protective Equipment: • safety glasses • chemically resistant gloves and boots	Shop and drivers will have PPE in their vehicles to use when loading/unloading oil at the facility.	Personal Protection
Communications System	Employee company issued cell phones.	Emergency Response
Spill Plan/Emergency Contact Numbers • Blank Spill Report Sheets	Office/Shop	Emergency response and spill clean up

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F. Communication

F.1. In the event of an emergency or used oil spill, employees will use cell phones and in-person verbal communication to notify employees of the emergency and any need to evacuate and also to contact the supervisors and emergency coordinators and provide details regarding the emergency or spill event.

G. Facility Emergency Evacuation Plan

G.1. In the event of a serious spill, fire, or explosion which presents possible hazards to human health and to the environment, all personnel will immediately evacuate the premises in accordance with the following procedures.

G.2. Cell phones will be used to alert employees of the emergency and employees shall evacuate.

G.3. Employees shall evacuate to the muster area north west edge of the property (Attachment 1- Facility Site Map).

H. Coordination Agreements

H.1. A copy of the Emergency Control and Contingency Plan and all revisions will be sent to the government agencies and prime emergency responders (e.g. local fire department). A copy of the plan will be maintained onsite.

I. Spill Control, Emergency Response and Reporting Requirements

I.1. All used oil spills shall be immediately cleaned up. Operators shall take action to prevent the spilled material from spreading by utilizing absorbent, dirt, booms, pads, rags, etc. The operators should prevent used oil from entering any adjacent storm water drains, sewer drain systems or surface waters at or adjacent to the facility.

I.2. The operator shall call 911 when warranted to summon emergency personnel to the scene.

I.3. If more resources are required, the operator will contact a supervisor to dispatch a spill response team to help facilitate the mitigation and/or remediation of the spill.

I.4. Used oil spills exceeding 25 gallons, or smaller quantities that pose a risk to human health and the environment, shall be reported to Pacific West's management and to the Utah Department of Environmental Quality immediately after containment of the spill (Table I.4). The report must follow the reporting requirements of R315-15 UAC and Pacific West's Used Oil Processor Permit. Within 15 days after any release of used oil that is reported under R315-15-9 UAC, the person responsible for the material at the time of the release shall submit to the Director a written report in accordance with the reporting requirements of R315-15-9 UAC.

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Table: I.4: List of Agencies to Notify in Case of a Spill

Agencies Notification	Phone Number
National Response Center (if applicable)	(800) 424-8802
Utah Department of Environmental Quality (within 24 hrs.)	(801) 536-4123

I.6. Operators shall report any spills to facility manager (Table D.1) but are exempted from reporting de minimis drips to management that are immediately cleaned up by the responsible employee.

I.7. Operators shall submit a completed spill report when applicable to a supervisor at or before the end of the operator's shift.

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Attachment 3 - Appendix 1: Pacific West Spill Report Form

Discharge Information	**Name of Employee Reporting Spill:**	
Facility Name: Pacific West, LLC **Address:** 5751 North Droubay Road Erda, Utah 84074 **Corporate Telephone:** (801) 972-2727 **Primary Contact:** Levi Pratt, Facility Manager Cell (24 hrs.): (435) 241-0025 Email: lpratt@pacwestllc.com	**Type of Spill:**	**Discovery Date and Time:**
	Total quantity released:	**Discharge Date and Time:**
	Location/Source:	**Affected Media:** ☐ Soil ☐ Surface Water ☐ Storm Drain ☐ Sewer/POTW ☐ Other
Nature of discharges, environmental/health effects, and damages:		
Actions taken to stop, remove, and mitigate impacts of the discharge:		

Notification	**Date and Time**	**Comment**
Discharges exceeding 25 gallons (or smaller quantities that pose a risk to human health and the		
Fire Department/Other (911)		
Utah Department of Environmental Quality - (801) 536-4123		
Other Information		

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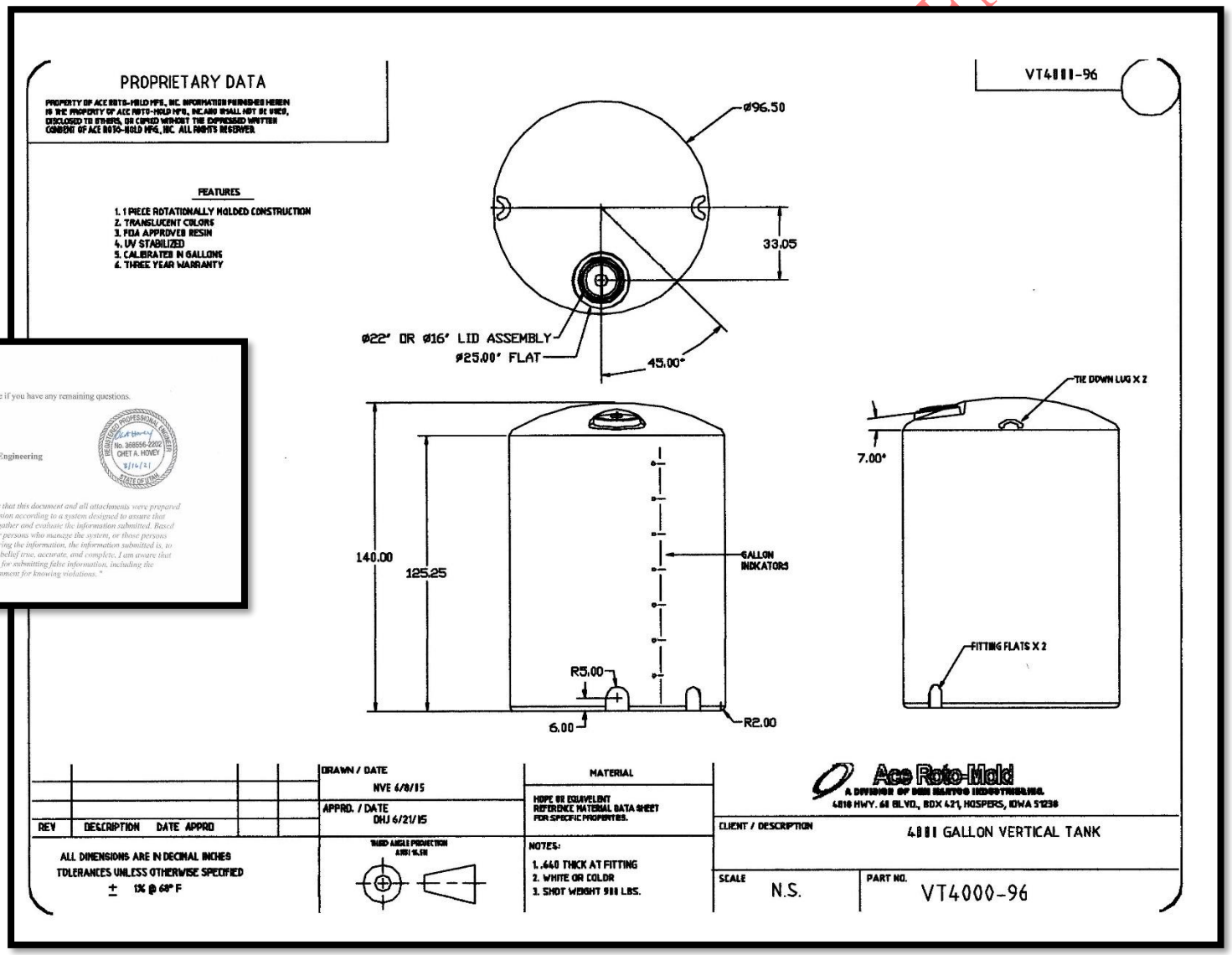
Attachment 4

Piping and Instrument Diagram



Mr. Howard
March 16, 2021
Page 2 of 2

Please feel free to contact me if you have any remaining questions.

Sincerely,

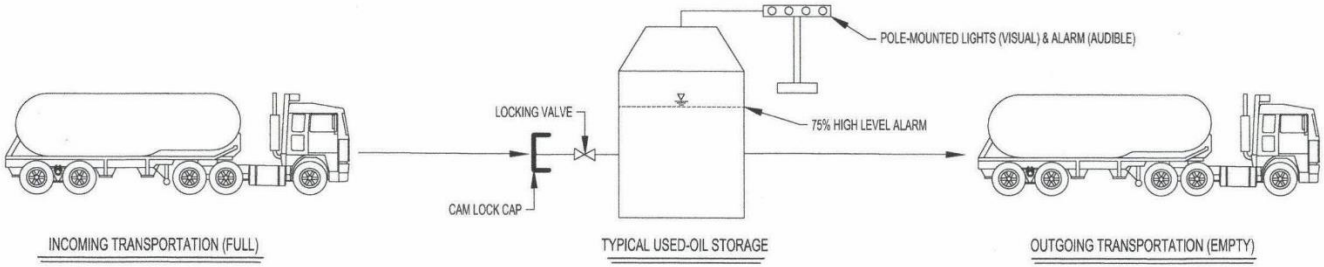
Chet Hovey

Advanced Environmental Engineering
Chet Hovey, P.E.
Principal-in-Charge

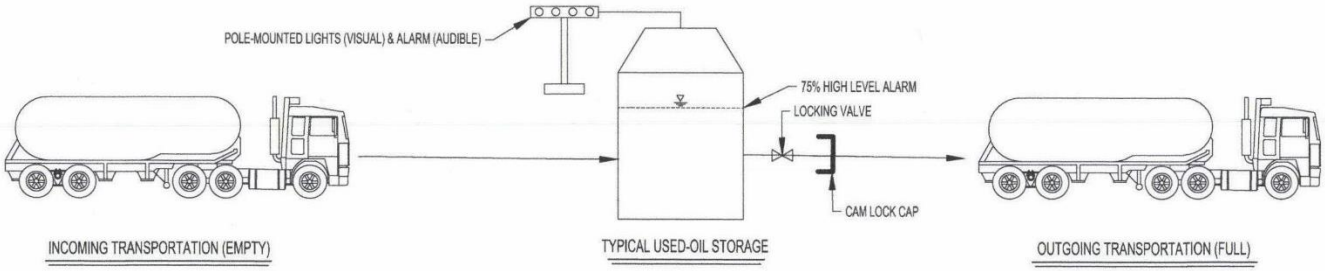
REGISTERED PROFESSIONAL ENGINEER No. 369556-2202 CHET A. HOVEY 3/16/21 STATE OF IOWA

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

USED-OIL STORAGE DROP-OFF (TEMPORARY STORAGE)



USED-OIL PICKUP FOR FINAL PROCESSING OFF-SITE



NO.	DATE	REVISION

DRAWING IS NOT TO SCALE IF BAR DOES NOT MEASURE 1 INCH
0 1/2 1

PROCESS & INSTRUMENTATION FLOW DIAGRAM

PACIFIC WEST, LLC
ERDA FACILITY
ERDA, UTAH

ADVANCED ENVIRONMENTAL ENGINEERING
789 EAST 80 NORTH, KAYSVILLE, UTAH 84037
PHONE: (801) 773-3553

DESIGN: CH
DRAWN: TL
CHECKED: CH
DATE: JOB#:

C1.1

Attachment 5

Sample Collection Procedures

A. General

A.1. Pacific West's employees shall use the sampling collection procedures listed below for the facility's used oil storage tanks and any samples collected from containerized waste generated during emergency response activities.

A.2. Samples requiring laboratory analysis must be analyzed by a Utah certified laboratory, that is currently certified for the analytical methods used to analyze the samples.

B. Used Oil Storage Tanks - Sampling and Review of Analytical Data

B.1. Operators shall follow the tank sampling procedure in Condition C when collecting samples from tanks used to screen the oil for halogens or to determine that the oil meets the requirements of R315-15-1.2 UAC (specification requirements).

B.2. On-Specification Determination Record Keeping Procedures

B.2.a. Tank farm operators shall review the analytical data received from the laboratory to verify that the oil has met or failed to meet the specification requirements of R315-15-1.2. The operators shall update the tank log sheet with sample's laboratory identification number and if the oil is on or off-specification.

B.3. Off-Specification Used Oil Handling Procedures

B.3.a. Off-specification oil that only fails to meet the specification requirements for flash point, Arsenic, Cadmium, Chromium, or Lead may be managed as follows:

B.3.a.1. The Permittee may process/blend the used oil at their facility until the used oil meets the specification requirements.

B.3.a.2. The facility may choose to ship the off-specification oil to a facility permitted to burn the off-specification used oil as fuel.

B.3.a.3. The facility may dispose of the used oil in accordance with R315-261 UAC.

B.3.b. Procedures for the handling of off-specification used oil that fails to meet specification requirements of R315-15-1.2 UAC for the allowable level for total halogens (4,000 ppm) are listed below:

B.3.b.1. Pacific West shall provide oral notification the Division within 24 hours when a used oil storage tank contains off-specification oil with a total halogen concentration greater than 4,000 ppm.

B.3.b.2. Pacific West is not allowed to process or blend this off-specification used oil to dilute the halogen concentration to meet the specification requirements.

B.3.b.3. Prior to shipment, Pacific West shall obtain a written approval from the Director for shipments of off-specification used oil with a halogen concentration greater than 4,000 ppm.

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C. Tank Sampling Procedure

C.1. Tank Lock Down Procedures

C.1.a. Operators will place a lock on the tank valve after collecting the used oil sample and then complete the required sample collection information on the tank log sheet

C.2. Sampling Method ASTM-D7831 – COLIWASA Sampling Device

C.2.a. The COLIWASA sampling device (glass or polypropylene/plastic tube) shall be long enough to provide a representative sample of the entire tank contents.

C.3. Step 1

C.3.a. Open the COLIWASA by placing the stopper mechanism or inter tube in the open position.

C.4. Step 2

C.4.a. Lower the tapered end of the outer sampling tube in the liquid at a rate that allows the liquid level inside and outside to the tube to equalize. If the level of the liquid in the sample tube is lower than that outside the sampler, the sampling rate is too fast and a non-representative will result.

C.5. Step 3

C.5.a. Use the stopper or tube mechanism to close the COLIWASA when it has reached the desired depth.

C.6. Step 4

C.6.a. Slowly withdraw the sample from the liquid, keeping the seal closed and holding the tube in a vertical position. Wipe the exterior of the sampler tube with a rag or allow the excess liquid to drain back into the container.

C.7. Step 5

C.7.a. Open sample jar and dispense the entire contents from COLIWASA into sample jar.

C.8. Step 6

C.8.a. The operator shall label the sample jar, complete a chain of custody form for the sample, and properly package the sample for shipment to the laboratory. The operator shall note on the tank log the date the sample collected and the date it was shipped to the laboratory for analysis.

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Attachment 6

Analysis Plan

A. Halogen Field Screening Methods

A.1. The Permittee shall screen, when applicable, used oil or oily water subject to the Rules in accordance with the following requirements:

A.1.a. CLOR-D-TECT® halogen test kit (EPA Method 9077) for oil containing less than 20% water; or

A.1.b. HYDROCLOR-Q® test kit if the oil contains between 20% and 70% water using the following conversion formula:

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

Example: sample contains 6 ml water and 4 ml oil (60% water) and the syringe reading is 2,000 ppm, then the true concentration is:

2,000 ppm [(10 ml + 4 ml)/10] = 2,800 ppm

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

B. Quality Control Sample

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

C. Halogen Laboratory Analytical Methods

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

D. Rebuttable Presumption

D.1. The Permittee may rebut the hazardous waste presumption in accordance with R315-15-4.5 UAC if the Permittee can demonstrate that the used oil does not contain significant concentrations of any of the halogenated hazardous constituents listed in Appendix VIII of EPA CFR 40, Part 261 which includes volatiles, semi-volatiles, PCBs, pesticides, herbicides and dioxin/furans. Generator knowledge may be used to exclude testing for pesticides, herbicides and dioxins/furans unless coming from a process where this is expected.

E. PCB Contaminated Used Oil

E.1. Laboratory testing for PCBs shall be conducted in accordance with R315-15-18(d) UAC when used to satisfy any requirements of the Rules and this Permit.

E.2. The required PCB sample preparation and analytical methods are listed in Table E.1.

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Table E.1: PCB Sample Preparation and Analytical Methods

Sample Preparation Methods	Analytical Method	Analytes *	
		PCB CAS RN	*PCB Aroclor®*
3500C (General) 3580A (Preparation) 3665A (Cleanup)	8082A	**12674-11-2**	**1016***
		147601-87-4	1210
		151820-27-8	1216
		11104-28-2	**1221***
		37234-40-5	1231
		11141-16-5	**1232***
		71328-89-7	1240
		53469-21-9	**1242***
		12672-29-6	**1248***
		165245-51-2	1250
		89577-78-6	1252
		11097-69-1	**1254***
		11096-82-5	**1260***
		37324-23-5	1262
		11100-14-4	1268
* Note: Analyses of the seven Aroclors® in bold font are required at a minimum.			

F. Waste Disposal

F.1. The Permittee shall manage, characterize and dispose of solids wastes (includes used oil sent for disposal) in accordance with the waste management requirements of R315-260 through 266, 268, 270, and 273.

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Attachment 7

Used Oil Loading and Unloading Procedures

A. Personal Protective Equipment

A.1. All operators must wear safety glasses, and chemically resistance boots and gloves when unloading or loading a vehicle.

B. Recordkeeping

B.1. Shipping documents/Bill of Lading or other relevant paperwork should be reviewed to ensure the acceptability of the material prior to transfer.

C. Tanker Truck Loading and Unloading Procedures

C.1. Determine that the truck's brakes are set. Block the wheels of the truck with chocks.

C.2. Determine the volume of oil to be transferred in the truck.

C.3. Check the storage tank's volume to assure there is sufficient space available in the tank to accommodate the total volume of oil to be transferred.

C.4. Hook up the hose to the truck's transfer valves.

C.5. Secure cam-lock ears with lock pins to prevent accidental hose disconnection.

C.6. Open the valves to the selected storage tank and turn on the truck pump.

C.7. After transfer is complete then turn off the pump and close the valves on truck and tank.

C.8. Disconnect the fill hose from the truck and tank and secure them to the truck.

C.9. Complete tank log sheet record

C.10. Clean up any materials spilled before leaving tank farm.

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Attachment 8 – Closure Cost Estimate and Closure Plan

A. General

A.1. The Permittee shall at time of closure comply with all the clean-up and closure requirements of R315-15-5 and this Closure Plan (Attachment 8 - Appendix 1- Itemized Closure Cost for Financial Assurance).

B. Soil and Groundwater Testing

B.1. At time of the closure of the facility, the Permittee shall sample the soil and groundwater (Metals (including RCRA 8), Volatiles, Semi-Volatiles and PCBs) to determine the potential contamination from used oil operations at the facility.

B.1.a. An updated closure plan will be submitted for Director's approval. The updated plan shall include the specific location for each sample collected.

B.1.b. The Permittee shall submit a Level III data validation analytical package from a Utah- certified laboratory for all samples used to verify closure within 30 days of receipt to the Division for review and Director approval.

B.2. The Permittee shall adhere to the Cleanup Action and Risk-Based Closure Standards of R315-101 UAC at closure of the facility or site characterization.

B.2.a. The Permittee shall use the EPA Regional Screening Levels (RSLs) table for screening of contaminants in soils and groundwater during site characterization.

B.2.b. Analysis of volatile Organic Compounds (VOCs), Semi-Organic Compounds (SVOCs), including Poly Aromatic Hydrocarbons (PAHs) shall be conducted in lieu of Total Petroleum Hydrocarbon (TPH) fractionation analysis of Gasoline Range Organics (GRO), Diesel Range Organics (DRO), Oil Range Organics (ORO) during cleanup actions.

B.2.c. The Director may also require the impacted media (soil and groundwater) to be analyzed for other constituents that may include Polychlorinated Biphenyls (PCBs), and any other contaminants of interest as determined on a case-by-case basis based on the history of the site and activities.

C. Plant Decommission

C.1. The Permittee shall recycle/dispose of all used oil in the facility tanks and containers at time of closure.

C.2. The secondary containment liner shall be removed and disposed of at an appropriate disposal facility.

C.3. Hazardous waste, non-hazardous waste, rinsate water, and scrap metal generated shall be transported to a recycling facility or a waste disposal facility as applicable.

D. Closure Certification Costs

D.1. Closure of the facility in accordance with requirements of this Permit shall be verified by a Utah certified independent Professional Engineer (P.E.), and submitted to the Director for final approval.

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Attachment 8 – Appendix 1

Itemized Closure Costs for Financial Assurance

Soil and Groundwater Testing				
Description	**Quantity**	**Units**	**Rate**	**Cost**
Sampling (labor)	9	Hour	$75.00	$375.00
Samples & Analytical Testing Soil (8) Groundwater (1)	9	Each	$1,200.00	$10,800.00
Drilling for soil sample collection	10	Hour	$150.00	$1,500.00
Equipment Rental	1	Each	$2,000.00	$2,000.00
Level 3 QC Data Validation Report	1	Each	$1,000.00	$1,000.00
Site Sampling and Analytical Cost Sub-Total				**$15,675.00**
Facility Decommission				
Description	**Quantity**	**Units**	**Rate**	**Cost**
Oil removal, transportation, and recycling	17,400	Gallons	$0.08	$1,392.00
Tank decontamination and the disposal of generated rinsate water.	4	Each	$3,150.00	$12,600.00
Tank transportation and disposal	4	Each	$500.00	$2,000.00
Container transportation and disposal	1	Each	$1,500.00	$1,500.00
Disposal PCB contaminated soil (<50 ppm)	5	Tons	$1,300.00	$6,500.00
secondary containment liner removal, transport, and disposal	1	Each	$2,000.00	$2,000.00
Back fill tank farm area	1	Each	$2,000.00	$2,000.00
Closure Report and Project Management	30	Hour	$100.00	$3,000.00
Plant Decommission Cost Sub-Total				**$30,992.00**
Closure Certification & DWMRC Review				
Description	**Quantity**	**Units**	**Rate**	**Cost**
Independent P.E. Verification	1	Each	$4,000.00	$4,000.00
Division Review	30	Hours	$110.00	$3,300.00
Final Closure Verification Cost Sub-total				**$7,300.00**
10% Contingency				$5,397.00
Total Estimated Closure Cost (April 2021)				**$59,364.00**

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Attachment 9 - Tank Log sheet

Pacific West, LLC
5751 North Droubay Road
Erda, Utah 84074

Tank # _____

UO Processing Permit # UOP-178
EPA ID #UTR00010165

Date	Time	Manifest # Incoming/ Outgoing	Signature Driver*	Halogens (ppm) Tanker Off-load	Volume Delivered (Gal)	Volume Shipped (Gal)	Tank Volume (Gal)	Comments/Destination Oil Shipped
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				
				< 1000 ☐ Test ☐ GK				

Date/Time: Sample Collection & Shipped to Laboratory	Sampler Initials	Sample #	Laboratory Sample Analysis ID #		Sample Analytical Data Review
Collection/Date: **Time:** **Shipment/Date:** **Time:**					☐ Meets On-Spec Oil Specification ☐ Off-Spec

*Used Oil Transporter Delivery and Collection - Pacific West, LLC's (UOP-0135) (EPA ID# UTR000010165), tanker/container truck drivers are authorized to sign Pacific West's used oil Processing facility acceptance and shipment records.

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~~I.A. Effect of Permit~~

~~I.A.1 Pacific West LLC (hereafter referred to as "Permittee") is hereby authorized to operate as a Used Oil Processor located at 5751 North Droubay Road, Erda, Utah 84074 in accordance with all applicable requirements of R315-15 of the Utah Administrative Code and of the Used Oil Management Act (the Act) 19-6-701 et. seq., Utah Code Annotated and this Permit.~~

~~I.A.2. This permit shall be effective for a term not to exceed ten years in accordance with the requirements of R315-15-15 of the Utah Administrative Code.~~

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

~~I.A.4. It shall not constitute a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permittee's business activity in order to maintain compliance with the conditions of this Permit and its attachments~~

~~I.B. Permit Revocation~~

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

~~I.C. Permit Modification~~

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

~~I.C.2. Changes in operational activities include any expansion of the facility beyond the areas designated, alteration of processing operational parameters, changes in the type or number of storage tanks, piping, other processing equipment and changes to the contingency plan.~~

~~I.C.3. The Director may require the Permittee to submit additional information when reviewing permit modification requests to ensure the safe handling of used oil at the processing facility in accordance with 19-6-710(3)(b)(xii) Utah Code Annotated.~~

~~I.C.4. The Director may modify this Permit as necessary to protect human health and the environment or because of statutory or regulatory changes.~~

~~I.C.5. The Permittee shall notify the Director, in writing, of any non-substantive changes, such as changes in the contact person, within 20 days of the change.~~

~~I.D. Emergency Controls Systems and Facility Maintenance~~

~~I.D.1 The Permittee shall maintain and operate the Processor facility to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, ground, soil, surface and groundwater and sewer systems that could threaten human health and the environment.~~

~~I.D.2. The Permittee shall have communication systems, fire alarms and fire suppression equipment and processing alarms in place and operational at the facility, as well as arrangements with local emergency response teams (i.e. fire, police and hospital) in accordance with R315-15-5.3 of the Utah Administrative Code.~~

~~I.D.3. The Permittee shall have written documentation of the weekly inspections and maintenance of used oil processing equipment, secondary containment, containers, tanks, fire suppression systems (portable and fixed) and testing of emergency alarms for fire and other operational alarms set for processing equipment in accordance with R315-15-5.3(a)(2) of the Utah Administrative Code and the Inspections and Maintenance Schedules in Attachment 6.~~

~~I.D.4. Inspection documents shall include inspector's name, date, areas inspected, any problems found, and the subsequent actions taken by the facility to maintain system integrity.~~

~~I.D.5. To prevent access by unauthorized persons or vehicles during hours when the facility is closed and authorized personnel are not present, the Permittee shall secure the facility, lock the entrance security gate and maintain adequate perimeter fencing.~~

~~I.D.6. The Permittee shall maintain spill kits and fire extinguishing equipment as specified in Attachment 2.~~

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~~I.D.7. A secondary containment system for used oil containers, process and storage tanks, and piping and ancillary equipment shall be maintained for the facility in accordance with R315-15-5.5(c) of the Utah Administrative Code. The Permittee shall construct and maintain the secondary containment as described in Condition II.C.6.~~

~~I.D.8. Used oil, water or other liquids that may accumulate in the secondary containment system or any ancillary facility sumps shall be removed within 24 hours of discovery to prevent the possible migration to soil, ground or surface waters.~~

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~~I.E. Contingency Plan and Emergency Procedures~~

~~I.E.1. The Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are necessary to protect human health and the environment. In the event of a release of used oil, the Permittee shall immediately take appropriate actions to comply with R315-15-9 of the Utah Administrative Code and this Permit, Attachment 2, Contingency Plan and Emergency Response.~~

~~I.E.2. The Permittee shall keep a current copy and all revisions of the contingency plan on site until facility closure.~~

~~I.E.3. The Permittee shall provide a current copy to local police, fire departments, hospitals and State local emergency response teams that may be called upon during an emergency in accordance with R315-15-5.3(b)(3).~~

~~I.E.4. The Permittee shall implement the Contingency Plan whenever there is an imminent or actual emergency situation.~~

~~I.E.5. The Permittee shall notify the Utah Department of Environmental Quality 24-hour Answering Service, (801) 536-4123, for used oil releases exceeding 25 gallons or for smaller releases that pose a potential threat to human health or the environment in accordance with R315-15-9.1 of the Utah Administrative Code. The Permittee shall provide the information required by R315-15-9.1(c) of the Utah Administrative Code.~~

~~I.E.6. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil. The report shall also include a description of actions taken by the Permittee to prevent future spills.~~

~~I.F. Operating Record~~

~~I.F.1 The Permittee shall maintain an operating record (paper or electronic) in accordance with R315-15-5.8 of the Utah Administrative Code until final closure of the facility.~~

~~I.F.2. The operating record shall include the date, the name of the processing facility equipment operator, the processing system start-up and shut-down times, any upset condition (e.g. alarms, mechanical failure, or any event that requires implementation of the facility's Contingency Plan).~~

~~I.F.3. The Permittee shall have used oil sampling records and analytical results, tank storage volumes, and the volume of oily water processed through the system.~~

~~I.F.4 The Permittee shall retain records detailing the mass balance of wastewater entering and leaving the facility. This includes wastewater discharge records. This does not include water used in non-contact cooling processes.~~

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~~I.F.5. The Permittee shall document the volume of used oil transferred into and transferred out of each tank.~~

~~I.G. **Tracking Records**~~

~~I.G.1. The Permittee shall keep a written record of each used oil load received, transferred and delivered, including volumes, locations and dates.~~

~~I.G.2. The Permittee shall document the acceptance of used oil in accordance with R315-15-5.7(a).~~

~~I.G.3. The Permittee shall document the delivery of used oil in accordance with R315-15-5.7(b).~~

~~I.G.4. The Permittee shall keep transportation records of offsite used oil shipments delivered to and shipped from this facility. The Permittee shall only use Utah-permitted used oil transporters to ship used oil to or from this facility.~~

~~I.G.5. The Permittee shall maintain used oil storage tank records (bulk storage) that document the date, time, operator (initials), and volume of the used oil deposited into each tank and the date, time, operator (initials), and destination of the used oil removed from each tank (including inter-tank transfers).~~

~~**I.H. Record Retention**~~

~~I.H.1. The Permittee shall maintain all used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permitee's Processor facility at 1515 West 2200 South, Suite C, Salt Lake City, Utah.~~

~~I.H.2. Records may be in hard copy or in an electronic format and shall be readily accessible for inspection by authorized representatives of the Director. The Permittee shall maintain, for a minimum of three years, all applicable used oil processor associated records required by R315-15 of the Utah Administrative Code and this Permit, with the exception of the operating record, which shall be kept until facility closure.~~

~~I.H.3 The Permittee shall maintain other records (e.g. training and financial assurance) required by R315-15 of the Utah Administration Code and this Permit.~~

~~**I.I. Sampling and Analysis Plan**~~

~~I.I.1. The Permittee shall follow all sampling and analytical procedures in Conditions II.E and Attachment 4, Used Oil Sampling and Analysis Plan, when conducting used oil sampling and analytical testing to meet the requirements of R315-15-5.4 and 5.6 of the Utah Administrative Code and this Permit.~~

~~I.I.2. The Permittee shall have laboratory analytical data, that documents the PCB concentration of used dielectric mineral oil drained from electrical transformers and~~

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~~other electrical equipment, regulated under 40 CFR § 761, prior to acceptance and placement in the facilities used oil storage tanks, containers, or processing equipment.~~

~~I.J. Prohibitions~~

~~I.J.1. The Permittee shall not manage used oil in surface impoundments or waste piles.~~

~~I.J.2. The Permittee shall not place, manage, discard or otherwise dispose of used oil in any manner specified in R315-15-1.3 of the Utah Administrative Code.~~

~~I.J.3. Used oil that has been mixed with hazardous waste as defined by R315-261 of the Utah Administrative Code or PCBs as defined by R315-301-2(53) of the Utah Administrative Code shall no longer be managed as used oil and shall be subject to the rules applicable to hazardous waste and PCB-contaminated waste.~~

~~I.J.4. Used oil shall not be stored in containers, tanks, or piping that have previously stored hazardous waste, unless the containers, tanks, and piping are cleaned in accordance with R315-261-7 of the Utah Administrative Code.~~

~~I.J.5. The Permittee shall not accept used oil for storage or processing with a PCB concentration greater than or equal to 50 mg/kg (ppm).~~

~~I.J.6. The Permittee shall manage used oil with PCB concentrations of greater than or equal to 2 mg/kg but less than 50 mg/kg in accordance with R315-15-18 of the Utah Administrative Code. Used oil shall not be diluted to avoid any provision of any Federal or State environmental regulation.~~

~~I.J.7. Used oil shall not be stored in tanks, containers or associated piping that have previously stored PCB contaminated materials at or above 50 mg/kg (ppm), unless the tanks, containers, and piping or storage units are decontaminated as described in 40 CFR 761 Subpart S.~~

~~I.J.8. Any used oil that was mixed with the PCB-contaminated material shall be managed in accordance with R315-15-18 of the Utah Administrative Code and 40 CFR 761 Subpart S.~~

~~I.K. Waste Characterization and Disposal~~

~~I.K.1. The Permittee shall properly characterize used oil waste related material to determine if the wastes are hazardous or non-hazardous in accordance with R315-15-8 and R315-15-18 of the Utah Administrative Code and manage it accordingly.~~

~~I.K.2. The Permittee shall document and maintain records showing proper characterization, handling and disposal for all used oil related waste, including oily wastewater if sent for disposal.~~

~~I.K.3. The Permittee shall notify the Director within 24 hours of any used oil found at the facility with PCB concentrations greater than or equal to 50 mg/kg (ppm).~~

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~~I.K.4. The Permittee shall document and maintain analytical and disposal records for a minimum of three years. The Permittee shall characterize waste generated during the spill cleanup to determine if the waste is hazardous or non-hazardous in accordance with R315-15-8 and R315-15-18 of the Utah Administrative Code.~~

~~I.L. Liability and Financial Assurance Requirements~~

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

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

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

~~I.M. Cleanup and Closure Plan~~

~~I.M.1. The Permittee shall update its closure plan cost estimates and provide the update estimated to the Director, in writing, within 60 days following a facility modification that causes an increase in the financial responsibility required under R315-15-10 of the Utah Administrative Code. Within 30 days of the Director's written approval of a permit modification for the cleanup and closure plan that would result in an increase cost estimate, the owner or operator shall provide to the Director the information specified in R315-15-11.2(b)(2) of the Utah Administrative Code, Condition II.G, and Attachment 7 of this Permit.~~

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

~~I.M.3. The Permittee shall remove or decontaminate used oil residues in tanks, containment system, and the environment in accordance R315-15-5.5(f) of the Utah Administrative Code and this Permit's Closure Plan, Attachment 7.~~

~~I.M.4. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, a certification that the facility has been closed in accordance with R315-15-11.4 of the Utah Administrative Code and the~~

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~~specifications of the approved cleanup and closure plan. An independent, Utah-registered professional engineer and the Permittee shall sign the closure certification.~~

~~I.M.5. Additional sampling and remediation may be required by the Director to verify that cleanup and closure has been completed according to R315-15 of the Utah Administrative Code.~~

~~I.N. Used Oil Handler Certificate~~

~~I.N.1 In accordance with R315-15-5.9 of the Utah Administrative Code, the Permittee shall not operate as a used oil processor without obtaining annually a Used Oil Handler Certificate from the Director. The Permittee shall pay a used oil handler fee, pursuant to Utah Administrative Code Annotated Section 63J-1-504, by December 31 of each calendar year to receive certification for the upcoming calendar year.~~

~~I.O. Inspection and Inspection Access~~

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

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

~~I.O.3. Failure to allow reasonable access to the property by authorized employees is a "denial of access" and may be grounds for enforcement action or permit revocation.~~

~~I.P. Annual Report~~

~~I.P.1 As required by R315-15-13.5 of the Utah Administrative Code, the Permittee shall prepare and submit an Annual Report to the Director by March 1 of the following year. The Annual Report shall describe the Permittee's used oil activities in Utah and document financial assurance using the Division's Processor Annual Report form.~~

~~I.Q. Other Laws~~

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

~~I.R. Enforceability~~

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

~~I.S. Effective Date~~

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

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~~II.A. General Operations~~

~~II.A.1 The Permittee is authorized to store and process via gravity separation used oil in accordance with R315-15-5 of the Utah Administrative Code at 5751 North, Droubay Road, Erda, Utah, 84074.~~

~~II.A.2 The Permittee is authorized to store a maximum of 16,000 gallons of used oil in tanks described in Condition II.C of this Permit.~~

~~II.A.3. The Permittee shall have a current process and instrument diagram (PID), certified by a Utah professional engineer (Attachment 5), prior to storing used oil at this facility.~~

~~II.A.4. The Permittee shall only store used oil in tanks, containers or units subject to regulations under R315-265 or R315-264 of the Utah Administrative Code and maintain tanks, containers, associated piping, pumps and valves in good operational condition.~~

~~II.A.5. The Permittee may only accept used oil from a Utah-permitted used oil transporter or deliveries of exempted oily wastewater from waste haulers that maintain all required permits or registrations with the State, counties or municipalities.~~

~~II.A.6. The Permittee shall only accept shipments of used oil from trucks owned and operated by the Permittee.~~

~~II.A.7. The Permittee shall verify, at the time of acceptance, that the transporter delivering the used oil has recorded the halogen content of the used oil on the shipping documents.~~

~~II.A.8. If the transporter has not documented the halogen content on the shipping records, then the Permittee shall determine the halogen content of the shipment of used oil received at the facility, at the time of acceptance.~~

~~II.A.8.a. The Permittee shall determine the halogen content by collecting a representative sample in accordance with Condition II.D and Attachment 4, then screening the used oil sample for halogens, or by submitting the sample to a Utah-certified laboratory for analysis in accordance with the analytical requirements of Attachment 4.~~

~~II.A.8.b. When performing halogen tests, the Permittee shall then record the results of the halogen testing on the shipping document prior to shipment from the facility.~~

~~II.A.9. The Permittee is not required to further test used oil from a Utah-registered used oil marketer if the marketer provides, at the time of acceptance, analytical data results documenting that the used oil has been tested for the parameters in R315-15-1.2 of the Utah Administrative Code.~~

~~II.A.10. The Permittee may accept bulk used oil transported in 3000-gallon tanker trucks. The Permittee may also accept used oil in drums or containers.~~

~~II.A.11. Used oil recovered from oily water shall be managed as used oil in accordance with R315-15 of the Utah Administrative Code and this Permit.~~

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~~II.A.12. The Permittee shall not accept or store used oil with PCB concentrations greater than or equal to 50 mg/kg (ppm).~~

~~II.B Processing Description~~

~~II.B.1. The Permittee shall not perform any processing of used oil except for gravity separation and may store used oil in excess of 35 days in the manner described in Attachment 1 of this Permit.~~

~~II.C. Used Oil Storage~~

~~II.C.1. The Permittee shall only store used oil in the tanks specified in Table 1:~~

~~Table 1-- Facility Tanks~~

~~Tank Designation & Location~~	**~~Capacity~~**	**~~Tank Use~~**
~~Tank 1 – Main Tank Farm~~	~~4,000~~	~~Used oil from maintenance facilities and equipment~~
~~Tank 2 – Main Tank Farm~~	~~4,000~~	~~Used oil from maintenance facilities and equipment~~
~~Tank 3 – Main Tank Farm~~	~~4,000~~	~~Used oil from electrical equipment containing less than 2 mg/kg (ppm) PCBs~~
~~Tank 4 – Main Tank Farm~~	~~4,000~~	~~Used oil from electrical equipment containing 2 to 49 mg/kg (ppm) PCBs~~

~~II.C.2. The Permittee shall conduct inspections of used oil storage containers, tanks and secondary containment systems in accordance with Attachment 6 of this Permit. The Permittee shall record the inspector's name, the time and date of the inspection, and the condition of the tanks, storage containers, and secondary containment systems. The Permittee shall document in the inspection log any issues discovered during the inspections (e.g. leaking tanks or water accumulation) and any actions taken by the Permittee to resolve these issues.~~

~~II.C.3. The Permittee shall label used oil storage tanks, piping, drums, and containers with the words "Used Oil."~~

~~II.C.4. The Permittee shall keep drums and containers of used oil closed except while removing or adding used oil.~~

~~II.C.5. The Permittee may not store used oil in units other than tanks, containers, or units subject to regulations under R315-264 or R315-265.~~

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~~II.C.6. The Permittee shall use earthen berms for containment at its used oil tank farm. It shall place an HDPE welded liner over the berms in a manner that covers the bottom and sides of the containment. The liner shall be keyed into the top of the berms via a toe trench. The floor of the containment shall be covered with a layer of sand. The tanks shall be placed on skids so that they are elevated off the bottom of the floor of the containment.~~

~~II.D. Used Oil Loading and Unloading Requirements~~

~~II.D.1. The Permittee shall ensure that operations involving the loading or unloading of used are conducted in accordance with Attachment 3.~~

~~II.D.2. The Permittee is not authorized to transfer used oil to or from railcars unless this Permit is modified with the information required by R315-15-13.4(a)(16) of the Utah Administrative Code.]~~

~~II.E. Used Oil Sampling and Analysis~~

~~II.E.1. The Permittee shall sample used oil and other related materials in accordance with the requirements of Attachment 4, Used Oil Sampling and Analysis Plan.~~

~~II.F. Used Oil Training~~

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

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

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

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

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

~~II.G. Facility Closure~~

~~II.G.1. The Permittee shall implement the closure plan in Attachment 7 which evaluates the potential impacts of used oil operations on the surrounding soil, groundwater and surface water in accordance with R315-15-11 of the Utah~~

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~~Administrative Code. The Permittee shall be responsible for any cleanup of any used oil contamination that has migrated beyond the facility property boundaries in accordance with R315-15-11(d) of the Utah Administrative Code.~~

~~**II.H. Emergency Spill Response and Remediation**~~

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

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

~~II.H.3. The Permittee is responsible for the material release and shall recover oil and remediate any residue from the impacted soils, water, or other property, or take any other actions as required by the Director until there is no longer a hazard to human health or the environment.~~

~~II.H.4 Once the material is containerized, a waste determination shall be made to determine the material's disposition.~~

~~II.H.5. The Director may require additional cleanup action to protect human health or the environment.~~

~~II.H.6. All costs associated with the cleanup shall be at the expense of the Permittee.~~

~~II.H.7. Spill kits shall contain, at a minimum, the equipment listed in Table 2 in Attachment 2 of this Permit.~~

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

~~II.H.9. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.~~

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~~Attachment 1~~

~~General Used Oil Operations~~

~~Pacific West Operations is located at 5751 North Droubay Road, Erda, Utah 84074, offering used oil recycler service to our customers. Our facility will have four (4) 4,000 gallons above ground storages:~~

1. ~~2 each 4,000 gallons used oil tanks from maintenance facilities and equipment. These will be labeled as Tank 1 and Tank 2.~~
2. ~~One each 4,000 gallon used oil tank for oil from electrical equipment containing less than 2ppm PCB's. This tank will be labeled as Tank 3.~~
3. ~~One each 4,000 gallon used oil tank for oil from electrical equipment containing 2 to 49 ppm PCB's. This tank will be labeled as Tank 4.~~

~~Used oil will be transported into the facility by tanker trucks and in drums. Pacific West collects used oil from the entire State of Utah and surrounding states. The used oil collected and transported is generated from spills associated with railroad locomotive, railroad refrigerated car derailments or accidents, power transformer failures or accidents, fuel or used oil tank overfills and vehicle accidents. The service truck which changes engine oil on site in heavy equipment will transport the used oil to a State of Utah approved used oil facility.~~

~~Upon arrival at Pacific West, LLC's facility at Erda, used oil in tanker trucks or drums will be unloaded into the appropriate tank (see above). Used oil will be off-loaded within 24 hours of pick at the Pacific West used oil tank or a customer's site or their approved facility.~~

~~Pacific West, LLC will not accept used oil filters, antifreeze, or any hazardous wastes at this facility. Any water that is separated from used oil via gravity separation shall be transferred to an appropriately permitted facility for treatment.~~

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Attachment 2

Contingency Plan and Emergency Response

Pacific West is committed to staging and having on hand all the necessary equipment to mitigate a spill and fire in the event of an emergency. Tanks will be equipped with high level audible alarms and flashing beacon lights visible at the tank farm and inside the adjacent maintenance facility to prevent over filling. All personnel are equipped with cellular devices to communicate with local fire and police as well as others within the site. Eye wash stations, first aid kits, & Fire extinguishers are located inside the shop facility immediately west of the tank containment. Additionally there will be a fire extinguisher located just outside the tank containment berm mounted on a post. There is a 10,000 gallon on site water storage tank immediately adjacent to the proposed tank containment on the southwest corner of the containment as well as a well head with yard hydrant for fire support. There is also an existing concrete containment pad and high pressure washer that is immediately adjacent to the proposed tank storage area. Pacific West is part of the local LEPC (Local Emergency Preparedness Committee) Emergency plan will be reviewed and discussed with the local emergency responders and reviewed on a regular basis as part of the LEPC meetings.

Emergency Response

A. In the event of spill, notify Utah State Department of Environmental Quality, 24-hour Answering Service (801) 536-4123 for a release exceeding 25, gallons, or smaller releases that pose a potential threat to human health or environment. The person first identifying the spill will report it to Pacific West emergency coordinator. The emergency coordinator will assess the quantity of the material released, extent of injuries, if any, and the potential hazards to human health or the environment. The Pacific West emergency coordinator will notify the following:

1. U.S. Environmental Protection Agency
Nation Response Center
1(800) 424-8802

2. Utah DEQ
Regular hours (801) 536-4100
After hours (801) 536-4123

3. Utah Department of Environmental Quality-DERR
(801) 536-4100

4. Tooele County Emergency Response Coordinator
(435) 882-8100

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B. The following information will be given to above agencies:

a. Name and phone number of the Pacific West coordinator.

b. Site address (5751 North Droubay Road, Erda Utah) and where on the facility the release occurred.

c. Time and date of the incident occurred.

d. Type of incident (i.e., tank hole, hose broken, etc.).

e. Quantity of material spilled (i.e., 1,000 gallons of used oil, etc.).

f. Extent of injuries, if any.

g. Potential hazards to human health and the environment that include skin and eye irritation, neurologic, breathing problems and stress.

C. The Pacific West coordinator will direct action to do the following:

1. Eliminate the source of spill.

2. Contain any material already spilled.

a. If fuel or used oil breaches the containment area, start building a second containment. (Use absorbents or earth materials).

3. Isolate all unaffected areas from the affected area.

4. Rope off the affected area.

5. Restrict access to authorized personnel only.

6. Begin cleanup as soon as possible:

a. Liquids will be pumped, scooped up, absorbed or otherwise transferred to an appropriate container.

b. Solids will be swept or shoveled into an appropriate container.

c. All recovered material will be recycled at our facility.

D. List of Pacific West Emergency Coordinators

In case of a spill, the following person will act as the primary emergency coordinator:

Mr. Dustin Hall – Pacific West Operating Manager.

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(801) 972-2727 – Office
(801) 514-3623 – Cellular

Secondary Pacific West emergency coordinator is:

Mr. Michael Forrest – President
(801) 972-2727 – Main Office
(801) 510-7300 – Cellular

E. Written Reports

Within five (5) days after a reportable incident, the Pacific West coordinator will submit a written report to the Regional Administrator of the Environmental Protection Agency, Region VIII. Additionally, within 15 days following a reportable incident, Pacific West will submit a written report to the State of Utah, Division of Waste Management and Radiation Control Division Director. The report will contain the following information:

1. Name and phone number of the Pacific West emergency coordinator.

2. Pacific West, LLC Field Location Facility, Erda Pit
5751 North Droubay Road, Tooele, Utah 84074.

3. A description of the spill, including its date, time, and nature.

4. The operations involved.

5. The clean-up actions taken.

6. The changes in operational procedures and/or equipment to prevent such spills in the future.

7. The extent of injuries, if any.

8. An assessment of actual or potential hazards to human health or the environment, where applicable.

9. The estimated quantity and disposition of recovered material that resulted from the incident.

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SPILL CONTROL EQUIPMENT

Because Pacific West is an environmental spill cleanup contractor for several different entities we have on hand at our Shop Facility adjacent to the tank containment area: 10 bags of oil absorbent pads 34" X 38", 10 bags of oil absorbent pads 17" X 19", 500 ft. of oil absorbent booms, and 10 ea. 55 gallons drums. These materials are stored in fencing in storage area located against the east wall of the Shop Facility.

Table 2: Spill Kit Requirements

Equipment Description	Quantity
Shovel	2
Buckets	4
Drums (55-gal)	10
Absorbent pads 34" x 38"	10 bags
Absorbent pads 17" x 19"	10 bags
Oil absorbent booms	500 feet
Granulated absorbent (bags)	20
Spill Plan with Emergency Contact Numbers	1

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SUBSTANTIAL HARM DETERMINATION

Pacific West has determined that this facility could not, because of its location, reasonably be expected to cause substantial harm to the environment by discharging oil into on the navigable waters or adjoining shorelines as defined in 40CFR 112.120(A)(2). The certification form in making this determination is provide in Appendix A.

SPILL PREVENTION AND COUNTERMEASURE PLAN

1. No tanks are to be filled without first checking levels.

2. No pumps are to be operated unattended.

3. Gates, tank valves are to be locked and power to pump turned off when the site is unattended.

4. Tanks, piping, valves, pump and hoses are to be checked daily for any sign of leaks, deterioration or vandalism. (See also SPCC Inspection Sheet in Attachment 6.)

5. Warning signs are posted to check for line disconnection before moving equipment.

6. Fire extinguisher is present and in good working order.

IN EVENT OF SPILL

1. Report spills to facility supervisor immediately.

2. Turn off power to pump (switch located on pole south of tank).

3. Check valves to see if open.

4. Keep unauthorized persons out of area.

5. If fuel breaches containment area, start building a second containment. (Use absorbents or earth materials)

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~~Attachment 3~~

~~Used Oil Loading and Unloading Operations~~

~~The following procedures are to be utilized when loading and unloading used oil:~~

~~1. Operators of used oil handling equipment shall use Level D PPE with the addition of the following:~~

~~a. Long sleeved shirts will be worn.~~
~~a. All clothing shall be flame retardant treated.~~
~~a. Gloves with forearm gauntlets shall be worn.~~
~~a. A face shield shall be worn.~~

~~1. Prior to loading/unloading, the used oil transport driver will have secured the vehicle by positioning wheels chocks and applying the emergency brakes before loading or unloading used oil. At the unloading facility at Erda, UT, the truck will be positioned for unloading on the unloading pad which has traversable curbing around its perimeter to contain any spills.~~

~~1. The Operator shall place buckets or other containers under piping connections to collect drips of used oil during loading and unloading operations.~~

~~1. The Operator shall ensure the amount of used oil to be loaded into the tanks will not exceed the capacity using a calibrated gauging instrument.~~

~~1. During loading and unloading operations, the trained Operator shall remain at the transfer location and maintain control of the operations throughout the entire used oil transfer.~~

~~1. The Operator shall cleanup any spills and drippings from the used oil transfer and properly manage the cleanup materials.~~

~~1. Volumes transferred shall be documented in a tank log.~~

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Attachment 4
Used Oil Sampling and Analysis Plan

USED OIL SAMPLING PROCEDURES

PACIFIC WEST LLC

Samples will be collected in pre-cleaned glass containers and stored and transported in specially designated portable coolers. These supplies will be provided by a Utah accredited analytical laboratory.

Containers will be labeled with date and time, sample type, sample location, unique sample number, and the samplers' signature. The contract analytical laboratory will provide labels. Nitrile gloves will be worn during the collection of each individual sample and changed between samples. The samples will be stored in the field in chilled coolers (4° C). The samples then will be moved to a refrigerator or delivered to an analytical laboratory within the sample holding time specified for the analytical methods selected. Proper chain of custody protocol will be followed.

Sampling Drum/Totes:

Glass Oil Thief:

- Remove the cover from the sample container.
- Insert glass tubing almost to the bottom of the drum or until a solid layer is encountered. About one foot of tubing should extend above the drum.
- Cap the top of the sampling tube with a stopper or thumb, ensuring liquid does not come into contact with stopper.
- Carefully remove the capped tube from drum and insert the uncapped end into appropriate sample container.
- Screen sample using CLOR-D-TECT or HYDROCLOR-Q, halogen test kit or prepare sample to send to a Utah certified laboratory.

Sampling Tanks:

Sampling Equipment:

Dip tube sampler (Polypropylene/ plastic type tube) sampler.

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- Lower the sampling tube slowly into the liquid waste at a rate that allows the liquid level inside and outside the tube to equalize. Manways located at the top of the Tank will be used to collect samples.
- Slowly withdraw Dip tube from the liquid. Either wipe the exterior of the sampler tube with a disposable cloth or allow excess liquid to drain back into the used oil container/tank.
- Discharge the sample by placing the lower end of the Dip tube into a sampling bucket.
- Screen sample using CLOR-D-TECT or HYDROCLOR-Q, halogen test kit or prepare sample to send to a Utah certified laboratory.
- Empty the sample in the bucket back into the used oil container/tank. Cap the top of the sampling tube with a stopper or thumb, ensuring liquid does not come into contact with stopper.

In addition to the above procedures, Pacific West shall follow the protocols below:

1. The sampling shall be performed by personnel trained on appropriate sampling methods for each type of container and matrix

2. Samples will be taken in a manner that ensures that they are representative.

3. Composite sampling:

a. Samples collected from containers greater than 55 gallons shall be individual samples, not composite samples.

b. Samples collected from containers smaller than 55 gallons may be composited only if the used oil in those containers came from one piece of equipment.

c. Samples collected from containers smaller than 55 gallons shall not be composited if the used oil in those containers comes from multiple pieces of equipment. Containers of used oil from different sources, pieces of equipment, or processes shall be sampled individually.

4. Tank samples shall be collected in accordance with ASTM D7831.

5. Pacific West shall document the used oil was screened for halogens using either Method 9077, the Dexsil Clor-N-Oil 50 ppm® test kit, or PCB laboratory analysis supplied by Rocky Mountain Power for oil from electrical equipment.

6. Prior to accepting used transformer oil, Pacific West shall obtain analytical data confirming the PCB concentration of the used oil is less than 50 mg/kg (ppm) in accordance with Table 3.

7. When screening for halogens using Dexsil field screening kits, Pacific West shall use one of the following:

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

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

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

Example: sample contains 6 ml water and 4 ml oil (60% water) and the syringe reading is 2,000 ppm, then the true concentration is:

2,000 ppm [(10 ml + 4 ml)/10] = 2,800 ppm; or

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

8. Pacific West shall document on acceptance records the screening results to determine if the total halogens concentration of the incoming used oil is less than 1,000 ppm.

9. In lieu of screening with a CLOR-D-TECT® kit, method 9077, Pacific West may collect and submit representative used oil samples to a Utah-certified laboratory to analyze for total halogen concentrations using EPA method 9076 prior to placing used oil into the tanks.

10. PCB Contaminated Used Oil:

a. Pacific West shall not accept for storage or processing used oil with PCB concentrations greater than or equal to 50 mg/kg.

b. Records of any laboratory test results used to demonstrate PCB concentrations shall be attached to the transportation record.

c. Used oil may not be diluted to avoid any PCB provision of any federal or state environmental regulation.

Table 3 – PCB Sample Preparation and Analytical Methods

Sample Preparation	**Analytical Procedure**	**Analytes**	
		PCB CAS RN	***PCB Aroclor***
3580A	• PCB Analytical Method 8082A® • Analyses of the Aroclors® bolded in the last column are mandatory. • Additional Aroclors® should be	**12674-11-2**	**1016**
		147601-87-4	1210
		151820-27-8	1216
		11104-28-2	**1221**
		37234-40-5	1231
		11I4I-I6-5	**1232**
		71328-89-7	1240
		53469-21-9	**1242**
		12672-29-6	**1248**
		165245-51-2	1250
		89577-78-6	1252
		11097-69-1	**1254**
		11096-82-5	**1260**

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	analyzed if the oil typically	37324-23-5	1262
		11100-14-4	1268

Rebuttable Presumption:

1. Used oil that fails the halogen screen or analytical results with concentrations greater than 1,000 ppm is presumed to have been mixed with a hazardous waste.

2. Pacific West may rebut the hazardous waste presumption in accordance with R315-15-4.5 of the Utah Administrative Code if Pacific West can demonstrate that the used oil does not contain significant concentrations of any of the halogenated hazardous constituents listed in Appendix VIII of EPA CFR 40, Part 261.

3. Halogenated compounds that must be considered in the rebuttable presumption are listed in 40 CFR 261 Appendix VIII, which includes volatiles, semi-volatiles, PCBs, pesticides, herbicides and dioxin/furans.

4. The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins if they are processed through a tolling arrangement as described in Subsection R315-15-2.5(c) of the Utah Administrative Code to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner or disposed.

5. The rebuttable presumption does not apply to used oils contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units if the CFCs are destined for reclamation. The rebuttable presumption does apply to used oils contaminated with CFCs that have been mixed with used oil from sources other than refrigeration units.

6. Used oil that exceeds the halogen content of 1,000 ppm is presumed to be a hazardous waste and shall not be placed into the facility tanks, vehicles or storage vessels unless Pacific West rebuts the hazardous waste presumption in accordance with the rebuttable presumption requirements above.

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~~Attachment 5~~

~~Facility Diagram and Piping and Instrument Drawings~~

~~When the facility tanks are constructed, Pacific West shall a permit modification to submit a PID drawing of the used oil tank farm and loading area, certified by a Utah professional engineer.~~

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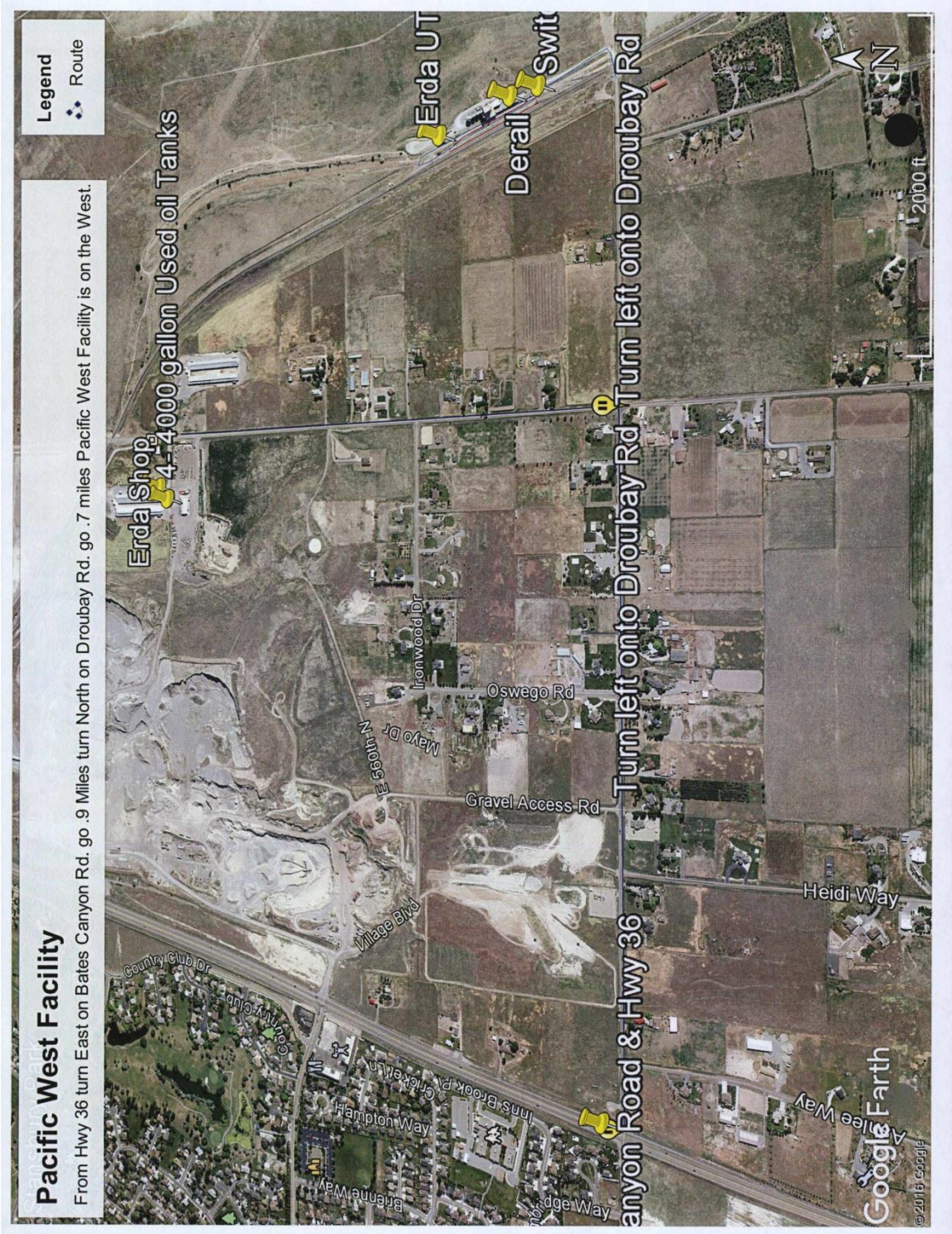
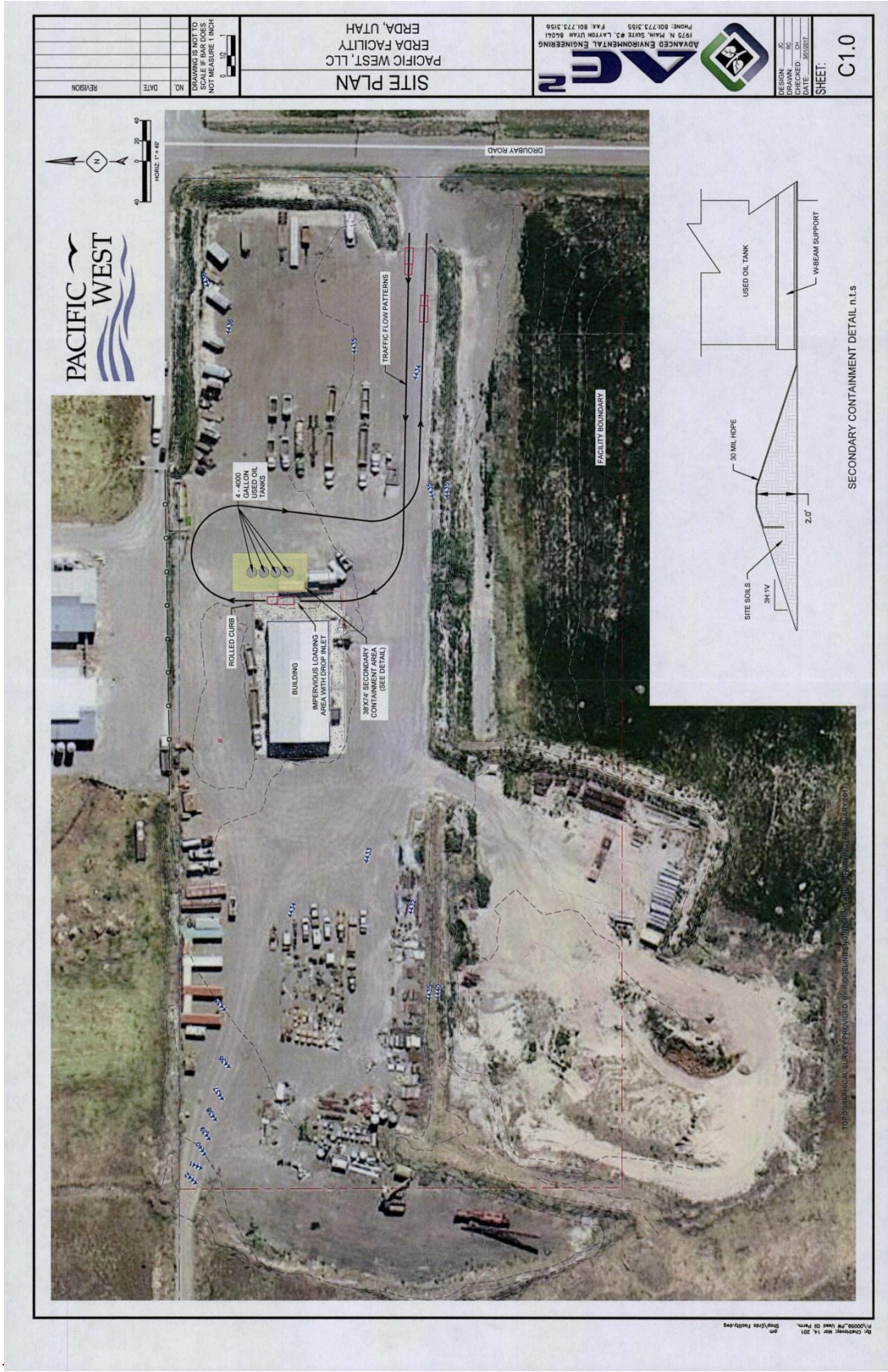

Pacific West Facility
From Hwy 36 turn East on Bates Canyon Rd. go .9 Miles turn North on Droubay Rd. go .7 miles Pacific West Facility is on the West.
Legend
Route
Erda Shop
4-4000 gallon Used oil Tanks
Erda UT
Derail
Swit
Turn left onto Droubay Rd
Turn left onto Droubay Rd
Canyon Road & Hwy 36
Country Club Dr
Country Club
Hampton Way
Briennie Way
Inns Brook Pl
Cricket Ln
Ironwood Dr
Mayo Dr
E 560th N
Oswego Rd
Gravel Access Rd
Village Blvd
Heidi Way
Alice Way
N
2000 ft
Google Earth
© 2016 Google


SITE PLAN
PACIFIC WEST, LLC
ERDA FACILITY
ERDA, UTAH
ADVANCED ENVIRONMENTAL ENGINEERING
1975 N. MAIN, SUITE #3, LAYTON UTAH 84041
PHONE: 801.773.3155 FAX: 801.773.3156
DESIGN: JC
DRAWN: RC
CHECKED: DH
DATE: 3/9/2017
SHEET: C1.0
DRAWING IS NOT TO SCALE IF BAR DOES NOT MEASURE 1 INCH
REVISION
DATE
NO.
PACIFIC WEST
HORIZ. 1"= 40'
DROUBAY ROAD
TRAFFIC FLOW PATTERNS
4 - 4,000 GALLON USED OIL TANKS
ROLLED CURB
BUILDING
IMPERVIOUS LOADING AREA WITH DROP INLET
38'X7.4' SECONDARY CONTAINMENT AREA (SEE DETAIL)
FACILITY BOUNDARY
USED OIL TANK
W-BEAM SUPPORT
30 MIL HDPE
SITE SOILS
3H:1V
2.0'
SECONDARY CONTAINMENT DETAIL n.t.s

HORIZ: 1" = 40'
40
20
0
20
40
DROUBAY ROAD
TRAFFIC FLOW PATTERNS
4 - 4000 GALLON USED OIL TANKS
ROLLED CURB
BUILDING
IMPERVIOUS LOADING AREA WITH DROP INLET
38'X74' SECONDARY CONTAINMENT AREA (SEE DETAIL)
FACILITY BOUNDARY
4436
4435
4434
4433
4432

~~Attachment 6~~

~~Inspections and Maintenance Schedules~~

PACIFIC WEST

SPCC INSPECTION SHEET
ERDA, UTAH

Inspection by:_____

Date:_____

INSPECTION AREA	FREQUENCY	INSPECTION INSTRUCTIONS	INSPECTION RESULTS
4 - 4,000 gallon above ground used oil tanks	Weekly	Examine overall tank condition looking especially for corrosion, bulges or dents, etc. Inspect secondary containment for integrity and presence of precipitation. Look for evidence of leaks from tanks and associated equipment.	
6,000 gallon above ground diesel fuel tank	Weekly	Examine overall tank condition looking especially for corrosion, bulges or dents, etc. Inspect secondary containment for integrity and presence of precipitation. Look for evidence of leaks from tanks and associated equipment.	
Secondary Containment	**Weekly**	Examine visually all materials associated with the tank farm secondary contaiment for any defects, damage, or failures that would effect the containment of any spilled products or tank failure.	

***** In addition to these scheduled inspections, containers should be checked frequently as part of ongoing operations procedures.**

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Attachment 7

Cleanup and Closure Plan

The purpose of this closure plan is to identify procedures and related costs necessary to safely remove all used oil and residues returning the site to original condition. The closure plan determines the financial requirements necessary to protect human health and the environment upon closing the facility. This closure plan was prepared in accordance to R315-15-11.

Closure Conditions and Procedures:

All storage tanks are located within a secondary containment system with impervious floors and walls. The off and on loading area is on an impervious surface with drain to a collection basin. Site closure may involve an ownership transfer to another company that may want the used oil infrastructure to remain in place or a full closure. A full closure would involve disassembly and removal of all oil and structures described in further detail below. The closure costs reflect the full closure scenario.

Characterization and Removal of Used Oil:

1. If the site closure were to involve the removal of oil, tanks, structures, all of the used oil would be drained and removed and transported to another permitted used-oil facility. Used oil that is transferred from our facility will have been determined to be non-hazardous from field testing performed prior to it being brought in and laboratory testing that is done after it arrives. Therefore, it is not anticipated that any additional testing of the oil would be required, unless it was required by the facility that the used oil was being transferred to.
1. Any off-site hauling of any used oil shall be by a Department of Transportation Certified Transporter with proper documentation and a Used Oil Transporter Permit issued by the Utah Division of Waste Management and Radiation Control (Division).
1. Oil that is in drums at the time of site closure may be removed as drums or alternatively may be pumped into a tank truck for transportation to an approved recycler or disposal facility. Empty drums will be shipped to an approved recycler/disposal facility if they are no longer needed at the facility.

Decommissioning and Removal of Tanks, Piping, and Secondary Containment (If site closure is to involve facility abandonment):

1. Once used oil is removed from the fixed location tanks, samples of tank bottoms shall be collected to determine if they have hazardous waste characteristics. The tank bottoms shall also be sampled for PCBs. Analytical analysis of the samples will determine disposal options for these materials. No less than one (1) sample shall be collected from each fixed location tank and analyzed.
1. Once the results of the tank bottoms sampling are received, the tank bottoms shall be removed for off-site transport and disposal. The methods and means of disposal of the tank bottom sediments shall be based on if the bottoms are determined to be hazardous, non-hazardous, or "Special Waste" materials (as defined in R315-301-2(71)). All sediments will be taken to an appropriately permitted solid waste disposal facility

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following any additionally required characterization. If the sediments are determined to be hazardous waste, they will be taken to a permitted hazardous waste disposal landfill.

1. The interiors of the fixed location tanks and pipings shall be rinsed and cleaned following the removal of all oil and tank bottoms. The rinsing and cleaning process shall involve a rinse with diesel fuel followed by a triple rinse with water. The generated rinsates shall be collected and transported for off-site disposal (likely to a POTW) once they has been adequately sampled and characterized based on the requirements of the receiving facility or to another facility permitted to accept such wastes.
1. Following the rinsing of tanks and piping and removal and disposal of rinsate water, the tanks and piping shall be disassembled and prepared for off-site transport. The tanks would be either stored on-site, sold and removed, or cut-up for scrape and taken to a recycling facility. Depending on the ultimate destination of the tanks and piping, wipe samples may be collected from the interior areas prior off-site transport. Costs for such has been included in the closure plan cost estimate.
1. Following the removal of above ground tanks and piping, secondary containments and paved loading and off-loading areas may be broken up and removed for off-site disposal at a recycling facility or a permitted disposal site. If removed materials require classification as "Special Waste" materials (as defined in R315-301-2(71)) based on testing results, they will be taken to an appropriately permitted solid waste disposal facility.

Soil Contamination Characterization and/or Remediation:

1. Following the removal of all used oil and any necessary tanks, piping, and secondary containment, an investigation into the extent and impacts from the site operations on soil and/or groundwater will be conducted.
1. The investigation into the extent and impacts from site operations to soil and/or groundwater would involve the drilling of test holes and/or borings and the collection of soil samples and/or groundwater samples to be submitted to a State of Utah approved laboratory. The Owner will coordinate with the Division as to the location of these borings.
1. The soil and/or groundwater investigation borings shall be logged by a qualified environmental professional for stratigraphy and for evidence of contamination and shall be sent to a Utah accredited Laboratory. The Laboratory will test the samples for PCB, RCRA metals, and hydrocarbon concentrations as shown in the Estimated Closure Cost table in Attachment 8 and item 5 below.
1. The findings from the soil investigation would be used to determine if any remediation is necessary and/or to outline a plan for remediation. If it is determined from sampling that the excavated soils can be classified as "Special Waste" materials (as defined in R315-301-2(71)) based on testing results, they will be taken to a permitted solid waste disposal facility.
1. Soil/Groundwater samples collected during closure shall be analyzed for semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), RCRA metals, and PCBs (congener analysis). Pacific West shall submit a Level IV data validation analytical package from a Utah- certified laboratory, within 30 days of receipt, to the Director for review and approval.
1. If groundwater is encountered during sampling, it will be sampled and analyzed.

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~~1. Pacific West shall coordinate with the Division during closure to provide opportunity for Division representatives to be present during sampling events.~~

~~Third Party Closure Verification Report:~~

~~1. Following the completion of all site closure activities, a Final Third Party Closure Verification Report shall be prepared by a Utah Registered Professional Engineer to verify that aspects of this Closure Plan have been met.~~

~~1. The aspects of the Closure Plan shall be deemed executed upon receipt by the Owner of a No Further Action letter issued by the Division Director.~~

~~1. If significant contamination is discovered beyond levels addressable by the procedures outlined above, the Owner will submit a site investigation/characterization plan to the Division for approval.~~

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~~Attachment 8~~

~~Closure Costs and Surety Bond~~
~~Pacific West, LLC~~

~~The estimated closure costs and assumptions used for the cost estimate are outlined and provided in Attachment 7. The Owner shall obtain a financial assurance mechanism of closure costs in accordance with the requirements described in R315-15-12.3. The financial assurance mechanism shall be among those listed as acceptable and the Owner shall notify the Division Director that a copy of the bond has been placed in the operating record.~~

~~The amount of the financial assurance mechanism shall be adjusted on an annual basis for inflation. The amount shall also be adjusted for any increase in used oil storage capacity or modifications to the used oil processes at the facility.~~

~~The Owner shall also establish a financial assurance mechanism at the time the bond is established that shall meet the requirements of Subsection R315-15-12.3, and the financial assurance mechanism shall follow the wording provided by the Division Director found in Subsection R315-15-17.~~

~~Completed and signed copies of the financial assurance mechanism and Financial Guarantee forms are attached at the end of this section following the table.~~

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1975 North Main Street; Suite #3
Layton, UT 84041
Phone: (801) 773-3155
Fax: (801)773-3156

CLIENT: Pacific West
PROJ: Erda Facility
BASIS: Previous Closure Costs Estimates and Bids, 2018 Lab Price List
PREP: Chet Hovey, P.E.
DATE: 12/22/17

Engineer's Opinion of Probable Closure Costs

Item	Description	Quantity	Unit	Unit Cost	Total
1. Characterization and Removal of Used Oil					
	Sample Remaining Used Oil				
	Total Halogen Analysis	10	Sample	60	$ 600.00
	PCBs method SW-846 8082A	10	Sample	65	$ 650.00
				Subtotal	**$ 1,250.00**
	Off-Site Transportation of Used Oil				
	Pump, remove, and haul used oil	16000	Gallon	0.08	$ 1,280.00
				Subtotal	**$ 2,530.00**
2. Decommissioning and Removal of Tanks, Piping, Secondary Containment, and Loading Areas					
	Rinse ASTs and Piping and Disposal Rinsate				
	Rinse Tanks	5000	Gallon	$ 0.50	$ 2,500.00
	Water Samples	4	Sample	$ 125.00	$ 500.00
	Dispose Water	5000	Gallon	$ 0.50	$ 2,500.00
	Off-Site Transport/Disposal of Tank Bottom Sediments				
	Total Halogen, RCRA Metals Analysis, & PCB Testing of Tank Bottoms	10	Sample	$ 178.00	$ 1,780.00
	Sediment Removal and Disposal (non-hazardous)	4	tons	$ 125.00	$ 500.00
	Sediment Removal and Disposal (hazardous)	1	tons	$ 300.00	$ 300.00
	Disassemble Tanks and Piping/Remove Materials				
	Dissamble Tanks	1	Lump Sum	$ 10,000.00	$ 10,000.00
	Wipe Samples (RCRA metals)	15	Sample	$ 160.00	$ 2,400.00
	Tank Removal	40	tons	$ 100.00	$ 4,000.00
	Sampling of Off-Site Disposal of Concrete Contaiments				
	Samples (hydrocarbons, RCRA Metals)	5	Sample	$ 225.00	$ 1,125.00
	Concrete hauling and disposal (non-contaminated)	40	tons	$ 50.00	$ 2,000.00
	Sampling of Off-Site Disposal of Secondary Contaiment				
	Samples (hydrocarbons, RCRA Metals)	5	Sample	$ 225.00	$ 1,125.00
	Liner hauling and disposal (non-contaminated)	1	tons	$ 95.00	$ 95.00
	Soils hauling and disposal (non-contaminated)	12	tons	$ 60.00	$ 720.00
				Subtotal	**$ 29,545.00**
3. Contaminated Soil and/or Concrete Characterization and/or Remediation					
	Soil/Groundwater Subsurface Investigation				
	Soil Borings	100	Feet	$ 15.00	$ 1,500.00
	Soil Samples (PCBs method SW-846 8082A)	10	Sample	$ 75.00	$ 750.00
	Soil Samples (TEH, metals, halogens, VOC, SVOC, flash point)	10	Sample	$ 664.00	$ 6,640.00
	Groundwater Samples (PCBs method SW-846 8082A)	2	Sample	$ 75.00	$ 150.00
	Groundwater Samples (TEH, metals, halogens, VOC, SVOC, PCBs)	2	Sample	$ 629.00	$ 1,258.00
	Level 4 QC Data Validation Analytical Package	1	Report	$ 2,369.40	$ 2,369.40
	Geologist (report, project manager)	40	Hours	$ 100.00	$ 4,000.00
	Remove/Dispose Contaminated Concrete and/or Soil				
	Concrete hauling and disposal (contaminated)	20	Tons	$ 125.00	$ 2,500.00
	Soil hauling and disposal (contaminated)	100	Tons	$ 125.00	$ 12,500.00
	Backfill and regrading	100	Tons	$ 25.00	$ 2,500.00
				Subtotal	**$ 34,167.40**
4. Third Party Closure Verification Report					
	Professional Engineer	40	Hours	$ 100.00	$ 4,000.00
				Subtotal	**$ 4,000.00**
	TOTAL FINANCIAL ASSURANCE ESTIMATE				**$ 70,242.40**