Safety-Kleen Systems, Inc.
125 Sommerville Road
Raleigh, NC 27603

December 15, 2023

Ms. Hillary Young
Chief Engineer – Land Protection Division
Oklahoma Department of Environmental Quality
707 North Robinson
Oklahoma City, Oklahoma 73101

Re: Part B Permit Renewal Application, for Safety-Kleen Systems, Inc., Oklahoma City OKD980878474

Dear Ms. Bari:

Safety-Kleen Oklahoma City is submitting the Part B renewal Application package via Fed ex. Included in this submittal are:

1. Two copies of the Part B application.
2. A complete electronic copy.
3. The Check for the application fee.

If you have any questions regarding this request, please feel free to contact me at (513) 616-7248 or via email at bleys@cleanharbors.com

Sincerely,

Stephen Bley
Sr. Environmental Compliance Manager
cc: Clean Harbors

APPENDIX A

Exhibit A-1 U.S. EPA Part A Application

Exhibit A-2 Subtitle C Information Form

Exhibit A-3 Facility Photos

EPA ID Number | O | K | D | 9 | 8 | 0 | 8 | 7 | 8 | 4 | 7 | 4 |

OMB# 2050-0024; Expires 04/30/2024

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	**Emily**	MI		Last Name	**DeVore**
Title	**Sr Manager Environmental Compliance**				
Email	devore.emilly@safety-kleen.com				
Phone	**(417) 324-8838**	Ext	**N/A**	Fax	**N/A**

2. Facility Permit Contact Mailing Address

Street Address **7528 Newcastle Road**		
City, Town, or Village **Oklahoma City**		
State **Oklahoma**	Country **USA**	Zip Code **73169**

3. Facility Existence Date (mm/dd/yyyy)

7/1/1985

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description

5. Nature of Business

THIS FACILITY IS AN ACCUMULATION POINT FOR MANY SPENT MATERIALS GENERATED BY SAFETY-KLEEN CUSTOMERS. ALL WASTES ARE ULTIMATELY SENT TO A SAFETY-KLEEN FACILITY OR A CONTRACTED EQIVALENT FACILITY.

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
X	1	S	0	1	3912	G	002	Container Storage Area
X	2	S	0	2	16800	G	001	Tank

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes								
								(1) Process Codes								(2) Process Description (if code is not entered in 7.D1))
0	1	D	0	0	1	990	T	S	0	1	S	0	2			Included with above
0	2	D	0	0	4	990	T									Included with above
0	3	D	0	0	5	990	T									Included with above
0	4	D	0	0	6	990	T									Included with above
0	5	D	0	0	7	990	T									Included with above
0	6	D	0	0	8	990	T									Included with above
0	7	D	0	0	9	990	T									Included with above
0	8	D	0	1	0	990	T									Included with above
0	9	D	0	1	1	990	T									Included with above
1	0	D	0	1	8	990	T									Included with above
1	1	D	0	1	9	990	T									Included with above

8. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

10. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

11. Comments

This submittal is being provided as part of the RCRA Part B permit Renewal Application.

Line item 7 continued on additional attached page.

The site maps specified in item 10. are provided in Appendix C of the accompanying RCRA Part B Permit Renewal Application.

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
1	**2**	D	0	2	1	990	T	S	0	1	S	0	2				Included with above.
1	**3**	D	0	2	2	990	T										Included with above.
1	**4**	D	0	2	3	990	T										Included with above.
1	**5**	D	0	2	4	990	T										Included with above.
1	**6**	D	0	2	5	990	T										Included with above.
1	**7**	D	0	2	6	990	T										Included with above.
1	**8**	D	0	2	7	990	T										Included with above.
1	**9**	D	0	2	8	990	T										Included with above.
2	**0**	D	0	2	9	990	T										Included with above.
2	**1**	D	0	3	0	990	T										Included with above.
2	**2**	D	0	3	2	990	T										Included with above.
2	**3**	D	0	3	3	990	T										Included with above.
2	**4**	D	0	3	4	990	T										Included with above.
2	**5**	D	0	3	5	990	T										Included with above.
2	**6**	D	0	3	6	990	T										Included with above.
2	**7**	D	0	3	7	990	T										Included with above.
2	**8**	D	0	3	8	990	T										Included with above.
2	**9**	D	0	3	9	990	T										Included with above.
3	**0**	D	0	4	0	990	T										Included with above.
3	**1**	D	0	4	1	990	T										Included with above.
3	**2**	D	0	4	2	990	T										Included with above.
3	**3**	D	0	4	3	990	T										Included with above.
3	**4**	F	0	0	1	40	T	S	0	1							
3	**4**	F	0	0	2	57	T	S	0	1							
3	**5**	F	0	0	3	35	T	S	0	1							
3	**6**	F	0	0	5	50	T	S	0	1							

RCRA SUBTITLE C ACTIVITIES FORMS

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (Select only one.)

☐	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
☐	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
	☐ Site was a TSD facility, a reverse distributor, and/or generator of ≥ 1,000 kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in **one or more months of the reporting year** (or State equivalent LQG regulations)
☐	Notifying that regulated activity is no longer occurring at this Site
☐	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
☑	Submitting a new or revised Part A (permit) Form

2. Site EPA ID Number

O	K	D	9	8	0	8	7	8	4	7	4

3. Site Name

Safety-Kleen Systems, Inc.

4. Site Location Address

Street Address **7528 Newcastle Road**		
City, Town, or Village **Oklahoma City**		County **Oklahoma**
State **Oklahoma**	Country **USA**	Zip Code **73169**
Latitude	Longitude	☐ Use Lat/Long as Primary Address

5. Site Mailing Address ☑ Same as Location Street Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

6. Site Land Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary)	**562112**	C.	**532490**
B.	**484220**	D.	**484230**

8. Site Contact Information

☐ Same as Location Address

First Name **Emily**	MI	Last Name **DeVore**
Title **Sr. Manager Environmental Compliance**		
Street Address **734 Northwest Bypass 66**		
City, Town, or Village **Springfield**		
State **MO**	Country **USA**	Zip Code **65802**
Email **devore.emilly@safety-kleen.com**		
Phone **4173248838**	Ext **NA**	Fax **NA**

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

☐ Same as Location Address

Full Name **Safety-Kleen Systems, Inc.**	4/1/1984

Owner Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street Address **42 Longwater Drive**		
City, Town, or Village **Norwell**		
State **MA**	Country **USA**	Zip Code **02061-9149**
Email **NA**		
Phone **781-792-5000**	Ext **NA**	Fax **NA**
Comments		

B. Name of Site's Legal Operator

☐ Same as Location Address

Full Name	Date Became Operator (mm/dd/yyyy)

Operator Type

☐ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street Address		
City, Town, or Village		
State	Country	Zip Code
Email		
Phone	Ext	Fax
Comments		

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities

☑ Y ☐ N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
☑	a. LQG	-Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
☐	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
☐	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
☐ Y ☑ N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. *Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.*	
☑ Y ☐ N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.	
☑ Y ☐ N	4. Receives Hazardous Waste from Off-site	
☐ Y ☑ N	5 Recycler of Hazardous Waste	
☐	a. Recycler who stores prior to recycling	
☐	b. Recycler who does not store prior to recycling	
☐ Y ☑ N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
☐	a. Small Quantity On-site Burner Exemption	
☐	b. Smelting, Melting, and Refining Furnace Exemption	

B. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	**D004**	**D005**	**D006**	**D007**	**D008**	**D009**
D010	**D011**	**D018**	**D019**	**D021**	**D022**	**D023**
D024	**D025**	**D026**	**D027**	**D028**	**D029**	**D030**
D032	**D033**	**D034**	**D035**	**D036**	**D037**	**D038**
D039	**D040**	**D041**	**D042**	**D043**	**F001**	**F002**

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes. Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)

A. Other Waste Activities

☑ Y ☐ N	1. Transporter of Hazardous Waste—If "Yes", mark all that apply.
☐	a. Transporter
☐	b. Transfer Facility (at your site)
☐ Y ☒ N	2. Underground Injection Control
☒ Y ☐ N	3. United States Importer of Hazardous Waste
☐ Y ☑ N	4. Recognized Trader—If "Yes", mark all that apply.
☐	a. Importer
☐	b. Exporter
☐ Y ☐ N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If "Yes", mark all that apply.
☐	a. Importer
☐	b. Exporter

B. Universal Waste Activities

☐ Y ☒ N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If "Yes" mark all that apply. Note: Refer to your State regulations to determine what is regulated.
☐	a. Batteries
☐	b. Pesticides
☐	c. Mercury containing equipment
☐	d. Lamps
☐	e. Aerosol Cans
☐	f. Other (specify) _____
☐	g. Other (specify) _____
☒ Y ☐ N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

☒ Y ☐ N	1. Used Oil Transporter—If "Yes", mark all that apply.
☒	a. Transporter
☒	b. Transfer Facility (at your site)
☐ Y ☑ N	2. Used Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
☐	a. Processor
☐	b. Re-refiner
☐ Y ☑ N	3. Off-Specification Used Oil Burner
☐ Y ☑ N	4. Used Oil Fuel Marketer—If "Yes", mark all that apply.
☐	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐	b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Pharmaceutical Activities

☐ Y ☑ N	1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if "Yes", mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
☐	a. Healthcare Facility
☐	b. Reverse Distributor
☐ Y ☑ N	2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262, Subpart K.

☐ Y ☑ N	A. Opting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories— If "Yes", mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
☐	1. College or University
☐	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
☐	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
☐ Y ☑ N	B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

☐ Y ☑ N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If "Yes", you must fill out the Addendum for Episodic Generator.

14. LQG Consolidation of VSQG Hazardous Waste

☐ Y ☑ N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If "Yes", you must fill out the Addendum for LQG Consolidation of VSQG hazardous waste.

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

☐ Y ☑ N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
	A. ☐ Central Accumulation Area (CAA) or ☐ Entire Facility
	B. Expected closure date: _____ mm/dd/yyyy
	C. Requesting new closure date: _____ mm/dd/yyyy
	D. Date closed : _____ mm/dd/yyyy ☐ 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8) ☐ 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

1. Notification of Hazardous Secondary Material (HSM) Activity

☐ Y ☑ N	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.

2. Electronic Manifest Broker

☐ Y ☑ N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?

3. Comments (include item number for each comment)

Item 10.b., continued: F003, F005.

4. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure 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 submitti ng false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy) 12/12/2023
Printed Name (First, Middle Initial Last) Mori T Sorenson	Title VP Environmental Compliance
Email mori.sorenson@safety-kleen.com	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	


Shippi
2
3
0
COR


DANGER
NO SMOKING
DANGER
NO SMOKING
DANGER
HAZARDOUS WASTE STORAGE AREA


FIRE EXTINGUISHER
2
3
0
COR
DANGER
UNAUTHORIZED PERSONNEL
KEEP OUT

Hey you!!
NO SMOKING
NOTICE
GOOD HOUSEKEEPING IS THE FIRST PRINCIPLE OF SAFETY
NO SMOKING
safety
WITHOUT A
ENVIRONMENT


NO
MOKING
408012


NO
SMOKING
408012
safety

PREMIUM
SOLVENT
Maximum Fill
Capacity
17 ft. 0 in.
11,016 Gallons

HAZARDOUS
WASTE
Maximum Fill
Capacity
18 ft. 6 in.
6,000 Gallons

PREMIUM
SOLVENT
Maximum Fill
Capacity
18 ft. 6 in.
16,000 Gallons

DANGER
NO
SMOKING

NO SMOK
WITHIN 50 FT


DANGER
NO SMOKING, MATCHES OR OPEN LIGHTS
DANGER
NO SMOKING, MATCHES OR


safety-kleen
WITHOUT A DOUBT.
ENVIRONMENTAL SERVICES
ENVIRODISPOSE
ENVIRODISPOSE.COM
LING SERVICES


safety-kleen
WITHOUT A DOUBT.
ENVIRONMENTAL SERVICES
ENVIRODISPOSE
ENVIRODISPOSE.COM
LING SERVICES


ER2809
ENVIRODISPOSE

Kirby

safety-kleen

7528

PARKING

CERTIFICATION STATEMENT

OKLAHOMA CITY, OK FACILITY

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure 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.

Name of Applicant: Kevin Stancil

Title of Applicant: Branch Manager

Signature of Applicant: Kevin Stancil

Date: 12/13/23

ATTESTATION

The undersigned attesting witness to the Certification Statement and this document of which this affidavit is part, states that I am personally responsible for the preparation of the document, that I personally gathered the information contained herein, and further that the information, to the best of my knowledge and belief, is true, accurate, and complete.

Name of Attesting Witness: Stephen Bley

Title of Attesting Witness: Environmental Compliance Manger

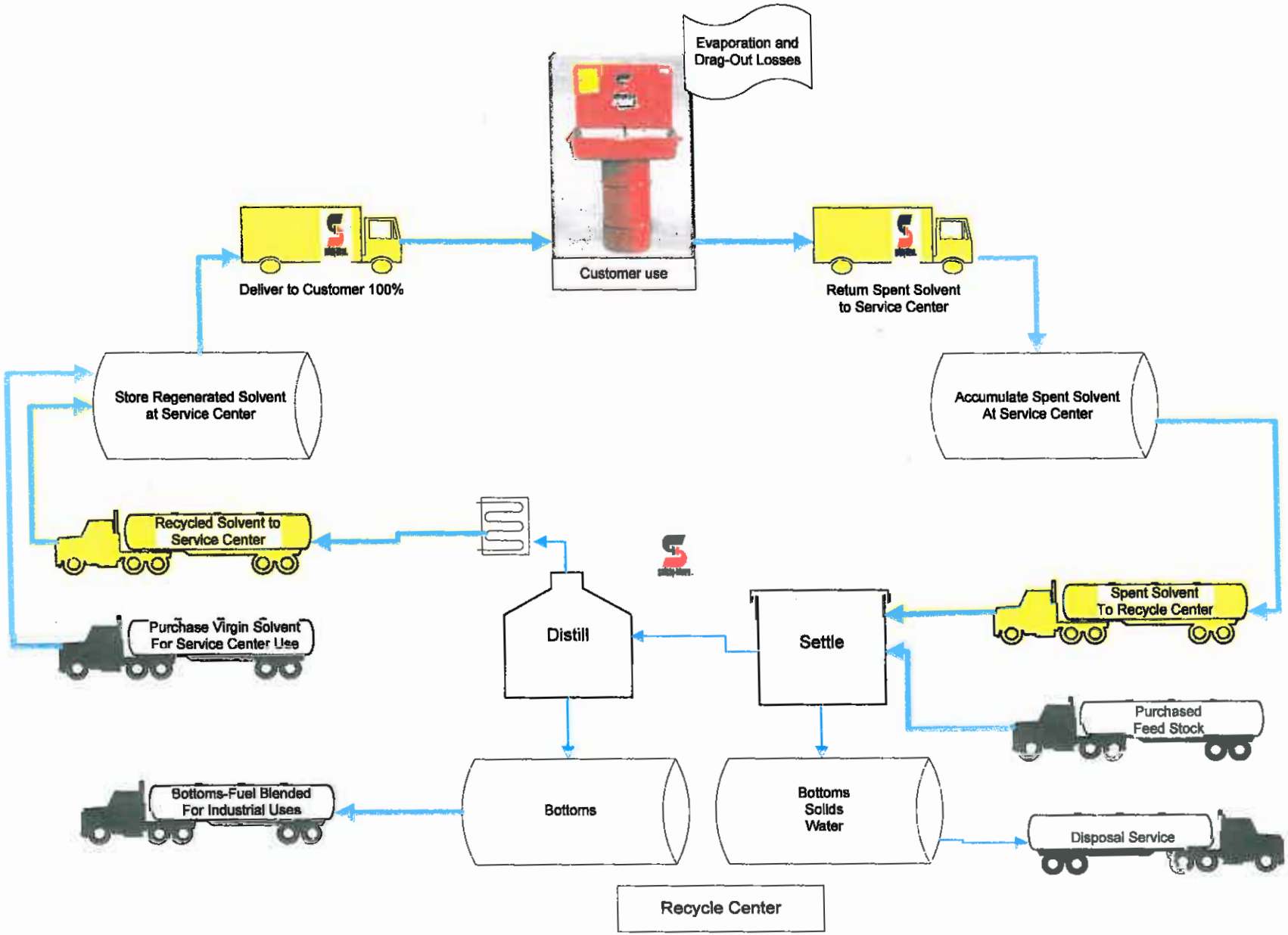
Signature of Attesting Witness:

Date: 12/13/2023

APPENDIX B

Safety-Kleen Solvent Use & Regeneration Loop

Exhibit B-1

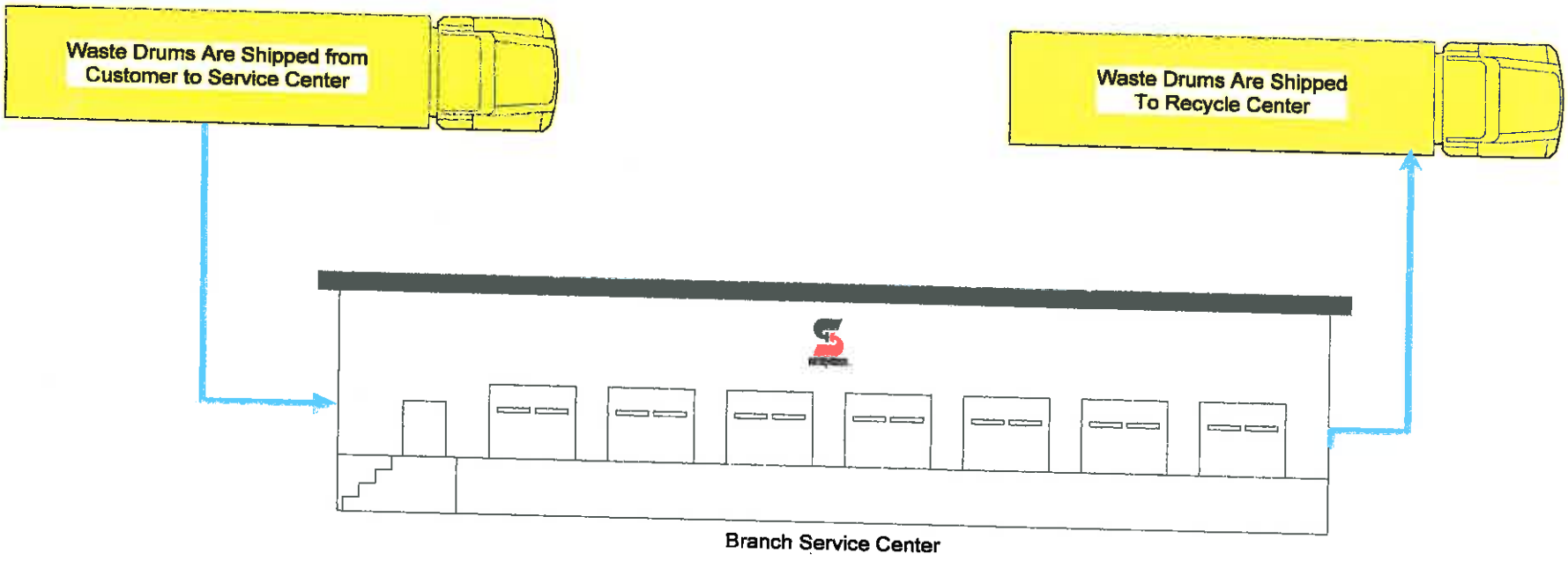


Unit Process for Han. .g Wastes in Containers

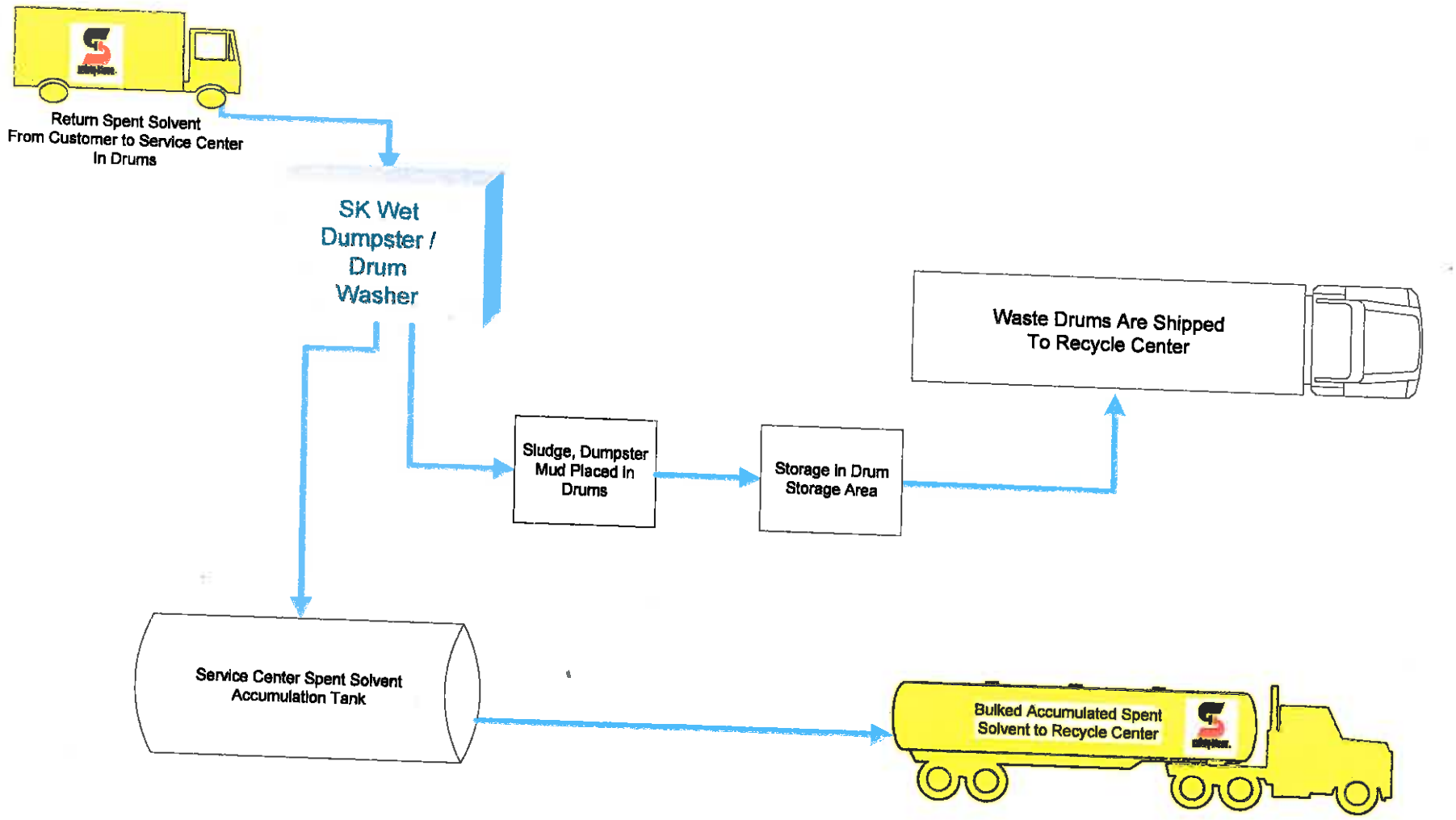
Includes Spent Immersion Cleaner, Dry Cleaning Waste, Paint Waste, Aqueous Solvents

Various Transfer Industrial Wastes

Exhibit B-2



Unit Process for the Handling of Spent Parts Washer Solvent



APPENDIX C

Exhibit C-1 Site Location Map

Exhibit C-2 Topographic Map

Exhibit C-3 Wind Rose

Exhibit C-4 Site Plan

Exhibit C-5 FEMA Flood Insurance Map

Google Maps

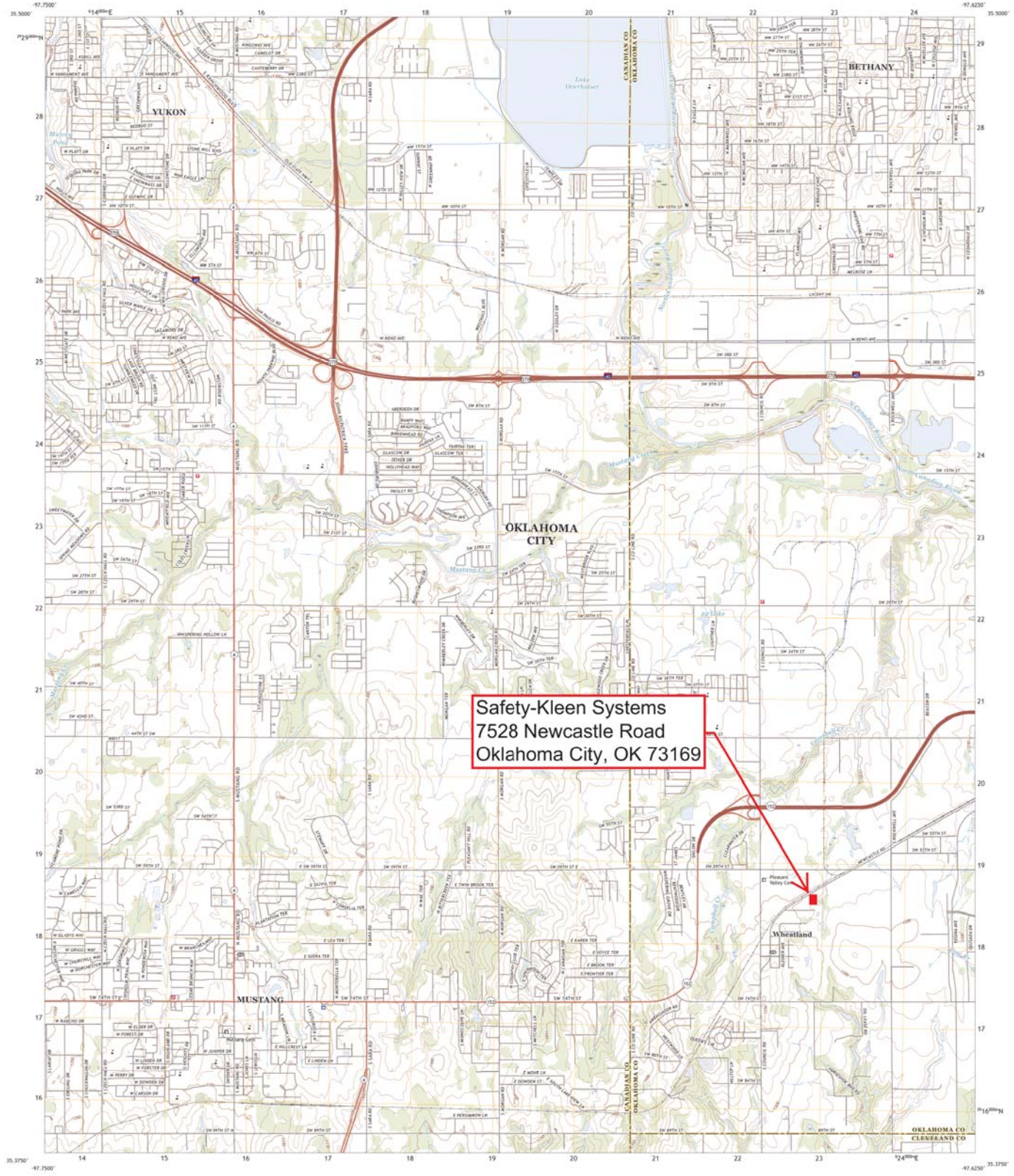
Imagery ©2023 Airbus, CNES / Airbus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2023 200 ft

USGS
science for a changing world

U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY

The National Map
US Topo

MUSTANG QUADRANGLE
OKLAHOMA
7.5-MINUTE SERIES



Produced by the United States Geological Survey
North American Datum of 1983 (NAD83)
World Geodetic System of 1984 (WGS84). Projection and
1 000-meter grid:Universal Transverse Mercator, Zone 14S
This map is not a legal document. Boundaries may be
generalized for this map scale. Private lands within government
reservations may not be shown. Obtain permission before
entering private lands.

Imagery	NAIP, May 2017 - July	2017
Roads	U.S. Census Bureau, 2015 -	2018
Names	GNIS, 1979 -	2018
Hydrography	National Hydrography Dataset,	2003
Contours	National Elevation Dataset,	2016
Boundaries	Multiple sources; see metadata file	2016
Public Land Survey System	BLM,	2018
Wetlands	Fish and Wildlife Service National Wetlands Inventory	1981

UTM GRID AND 2018 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

KILOMETERS 0 0.5 1 2
METERS 1000 0 1000 2000
MILES 1 0 0.5 1
FEET 1000 0 1000 2000 3000 4000 5000 6000 7000 8000 9000 10000

CONTOUR INTERVAL 10 FEET
NORTH AMERICAN VERTICAL DATUM OF 1988

This map was produced to conform with the
National Geospatial Program US Topo Product Standard, 2011.
A metadata file associated with this product is draft version 0.6.18

OKLAHOMA
QUADRANGLE LOCATION

ADJOINING QUADRANGLES
1 Richland
2 Bethany
3 Britton
4 Nicoma NE
5 Oklahoma City
6 Tuttle
7 Oklahoma City SW
8 Oklahoma City SE

ROAD CLASSIFICATION
Expressway
Secondary Hwy
Ramp
Local Connector
Local Road
4WD
Interstate Route
US Route
State Route

MUSTANG, OK
2018

USGS NGA REF NO. USGSX24K31207

cli-MATE
MRCC APPLICATION TOOLS ENVIRONMENT

Hi Stephen!
Log out

MRCC Midwestern Regional Climate Center

Privacy Policy

Data Selector

See Data Values

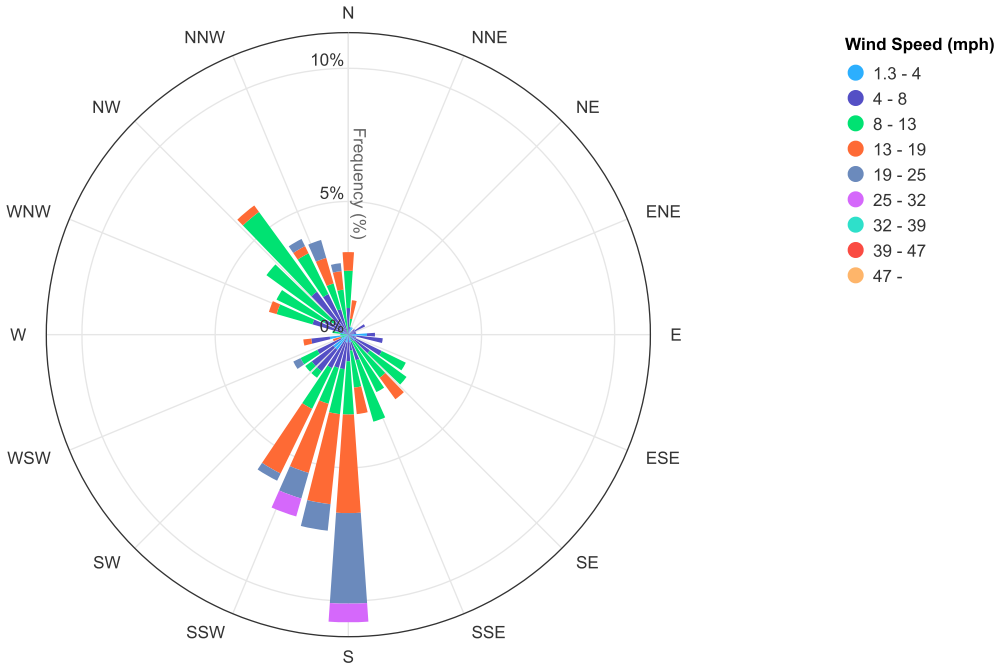
Data CSV Version

Product Description

Send Feedback

OKLAHOMA CITY POST AP (OK) Wind Rose

Dec. 1, 2023 - Dec. 13, 2023
Sub-Interval: Jan. 1 - Dec. 31, 0 - 23



Click and drag to zoom

OKLAHOMA CITY POST AP (OK) - Wind Frequency Table (percentage)

Latitude : 35.5342
Longitude : -97.6469
Elevation : 1297 ft.
Element : Mean Wind Speed

Start Date : Dec. 1, 2023
End Date : Dec. 13, 2023
# of Days : 13 of 13
obs : poss : 294 of 312

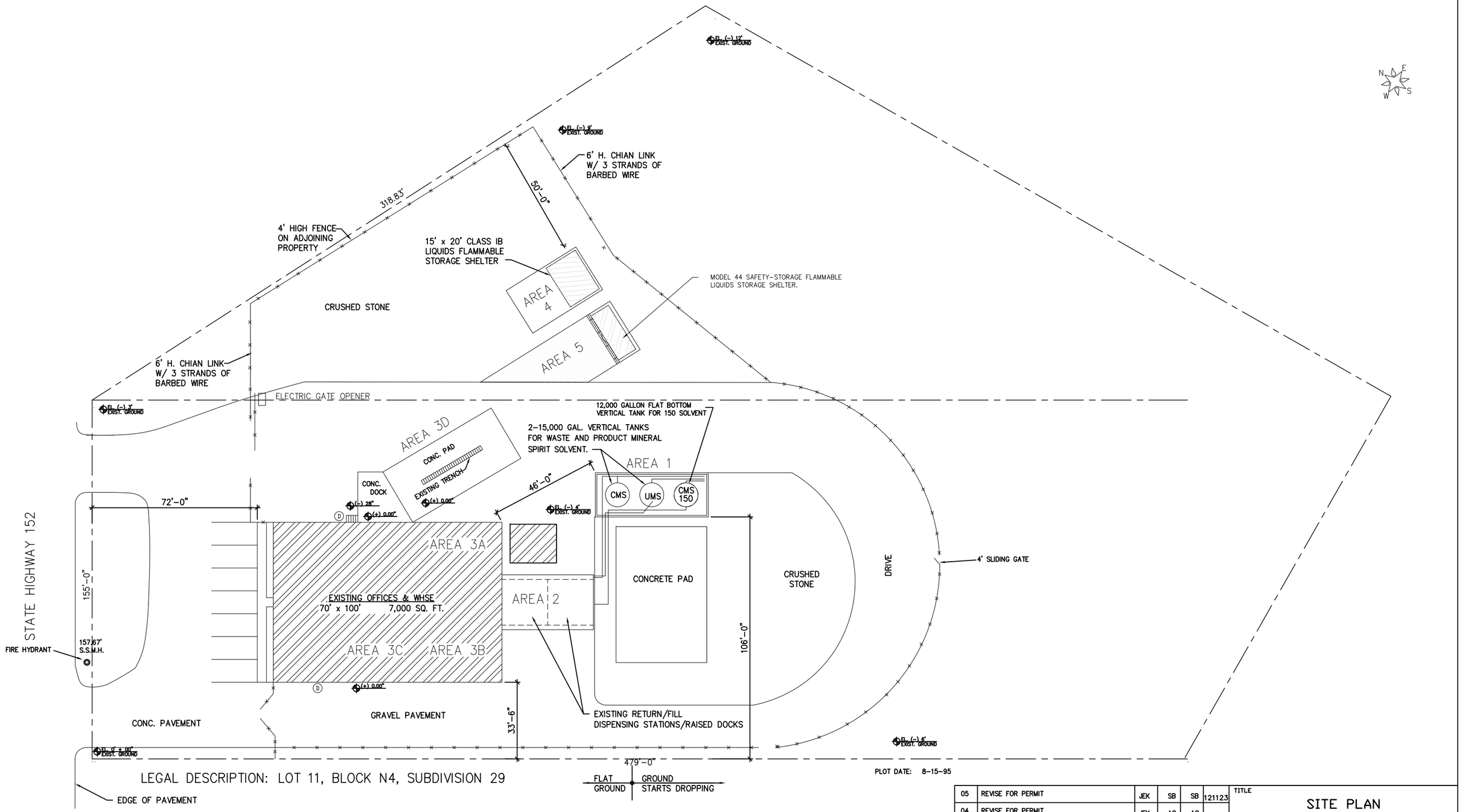
Sub Interval Windows

	Start	End
Date	Jan. 1	Dec. 31
Hour	0	23

(Greater than or equal to initial interval value and Less than ending interval value.)

Range (mph)	0	10	20	30	40	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	200	210	220	230	240	250	260	270	280
1.3 - 4	0.0	0.0	0.3	0.3	0.0	0.0	0.0	0.0	0.0	0.7	0.3	0.0	0.0	0.3	0.0	0.0	0.3	0.3	0.0	0.3	0.3	0.0	0.7	0.7	0.3	0.0	0.7	0.0	0.3
4 - 8	1.0	0.3	0.0	0.0	0.0	0.3	0.7	0.3	0.3	0.3	1.0	0.3	1.4	0.7	0.3	0.0	0.7	0.3	1.0	1.0	1.0	1.4	1.0	1.0	1.0	0.0	0.7	0.0	0.0
8 - 13	1.4	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.7	1.7	2.4	2.4	1.4	2.0	1.7	1.4	1.7	0.3	0.3	0.7	0.3	0.0	0.3	0.3
13 - 19	0.7	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.0	0.0	1.0	3.7	3.4	2.7	2.7	0.0	0.0	0.0	0.3	0.3	0.0	0.0
19 - 25	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.4	1.0	1.0	0.3	0.0	0.0	0.3	0.0	0.0	0.0	0.0
25 - 32	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
32 - 39	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
39 - 47	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
47 -	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total(%)	3.1	1.4	0.3	0.3	0.0	0.3	0.7	0.3	0.3	1.0	1.4	0.3	2.4	2.7	3.1	2.4	3.4	3.1	10.9	7.5	7.1	6.1	2.0	2.0	2.4	0.7	1.7	0.3	0.7
Calm (<1.3)																													
Ave Speed	9.0	12.1	3.4	3.4	0.0	4.7	5.8	4.7	5.8	4.5	5.7	6.0	7.1	8.7	10.6	9.5	7.9	10.9	16.4	13.5	14.3	12.0	5.6	5.4	8.4	12.1	6.4	11.4	5.7

Midwestern Regional Climate Center cli-MATE: MRCC Application Tools Environment Generated at: 12/13/2023 10:40:43 AM EST



LEGAL DESCRIPTION: LOT 11, BLOCK N4, SUBDIVISION 29

PLOT DATE: 8-15-95

GENERAL NOTES

1. NOTE: PIPING WITHIN SECONDARY CONTAINMENT AREA IS NOT ILUUSTRATED.

PROPRIETARY STATEMENT

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
05	REVISE FOR PERMIT	JEK	SB	SB	121123
04	REVISE FOR PERMIT	JEK	AG	AG	9-13-11
03	REVISE FOR SPCC	JEK			4-11-03
02	REMOVE PROPOSED ANTI-FREEZE NOTATION SHOW 150 SOLVENT TANK. REVISE 44 LOCATION	WEY			2-14-94
01	REMOVE PROPOSED IMPROVEMENTS AND SHOW NEW MODEL 44 FLAMMABLE STORAGE UNIT.	WEY			2-11-94
00	REVISED SAFETY KLEEN DRAWING TO CADD AS DATED. REPLACES S.K. DWG. D-11511	ALI			2-21-91

TITLE

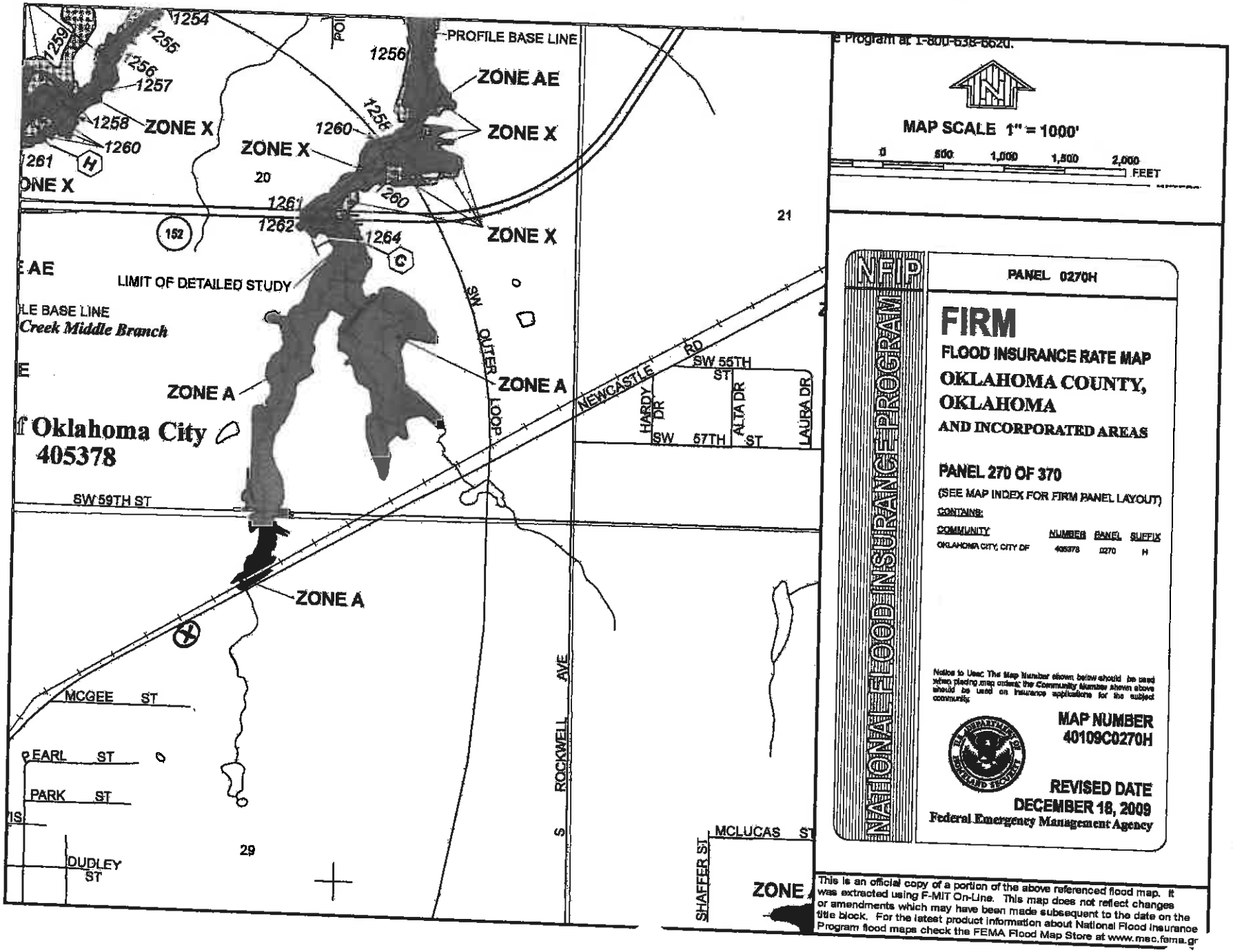
SITE PLAN
7528 STATE HWY 152

SAFETY-KLEEN SYSTEMS, INC.
42 LONGWATER DRIVE, NORWELL, MA 02061
PHONE: 781-792-5000

SCALE	BY	CHKD	P.E. APPR	DP. APPR	DATE
1" = 20'-0"	AT				5-26-89

SERVICE CENTER BRANCH AT: OKLAHOMA CITY, OK

STD-DWG-REV NO.: 7104-SP□□-001


1254
1255
1256
1257
1258
1259
1260
1261
1262
1264
ZONE X
ZONE AE
ZONE A
PROFILE BASE LINE
LIMIT OF DETAILED STUDY
20
21
29
152
SW 59TH ST
SW 55TH ST
SW 57TH ST
NEWCASTLE RD
SW OUTER LOOP
HARDY DR
ALTA DR
LAURA DR
MCGEE ST
PEARL ST
PARK ST
DUDLEY ST
S ROCKWELL AVE
MCLUCAS ST
SHAFFER ST
Oklahoma City
405378
Creek Middle Branch
MAP SCALE 1" = 1000'
0
500
1,000
1,500
2,000
FEET
NATIONAL FLOOD INSURANCE PROGRAM
PANEL 0270H
FIRM
FLOOD INSURANCE RATE MAP
OKLAHOMA COUNTY, OKLAHOMA
AND INCORPORATED AREAS
PANEL 270 OF 370
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)
CONTAINS:
COMMUNITY
NUMBER
PANEL
SUFFIX
OKLAHOMA CITY, CITY OF
405378
0270
H
Notice to User: The Map Number shown below should be used when placing map orders; the Community Number shown above should be used on insurance applications for the subject community.
MAP NUMBER
40109C0270H
REVISED DATE
DECEMBER 18, 2009
Federal Emergency Management Agency
This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gr

APPENDIX D

Exhibit D-1 Safety-Kleen Annual Recharacterization Program Statistical Model Summary

Exhibit D-2 Annual Recharacterization Sample Testing Protocol

Statistical Analysis of Annual Waste Characterization Data

Prepared by
Robert D. Gibbons Ph.D.

for

Safety Kleen
July 23, 1998

1 Introduction

Since 1990, Safety-Kleen has undertaken a major analytical study each year to document the contaminants in some of its most common waste streams to determine which TCLP waste codes should appear on the manifest for that waste. This Annual Waste Recharacterization Program is both expensive and extensive. Upon review, it appeared that regulatory agency instructions for how to interpret the data might not have been in line with current policy, as reflected in SW846. The general approach is based on development of an upper 900/o confidence limit[1] for the true concentration of each constituent, which can in turn be directly compared to regulatory standards to determine if the waste code should or should not be added to a particular waste stream (e.g., Premium Gold Parts Washer Solvent 150). The regulatory basis for this type of comparison stems from U.S. EPA SW846 Chapter 9 (September 1986) guidance on determining if a waste stream is hazardous.2 The primary complicating feature is the presence of large numbers of nondetects which raises serious question regarding the use of the parametric approach. In light of this concern, nonparametric methods are used througbout [3] Specifically, following U.S. EPA SW846, we construct a nonparametric 90% upper confidence limit (UCL) for the 50th percentile of the distribution (i.e., median), which is equivalent to the 90% UCL for the mean in the case of a symmetric distribution such as the normal distribution.

Inconsequently, the CI employed to evaluate solid wastes is, for all practical purposes, a 90% interval." U.S. EPA SW846 (1986) chapter 9 page 6.

[2],.The upper limit of the CI forμ is compared with the applicable regulatory threshold (RT) to determine if a solid waste contains the variable (chemical contaminant) of concern at a hazardous level. The contaminant of concern is not considered to be present in the waste at a hazardous level if the upper limit of the CI is less than the applicable RT. Otherwise the opposite conclusion is reached. "U.S. EPA SW846 (1986) chapter 9 page 3

[3]"If the data do not adequately follow the normal distribution even after logarithm transformation, a nonparametric confidence interval can be constructed. This interval is for the median concentration (which equals the mean if the distribution is symmetric)!' U.S. EPA Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities, April 1989, page 6-8

2 Method

Following Chapter 9 of SW846, the 90% UCL for the mean concentration obtained from a series of *n* representative samples is to be compared to the appropriate regulatory standard to determine if the waste stream is hazardous. If the UCL exceeds the standard, the waste stream is considered hazardous. The applicant must compute the UCL that is appropriate for the specific distributional form of the data. Given the large number of nondetects for many of the constituents, it is difficult if not impossible to clearly identify the underlying distributional form of the data. In this case, the U.S. EPA guidance indicates that a nonparametric alternative should be used.[4]

Nonparametric confidence limits are derived as follows. Given an unknown *P* x 100th percentile of interest (e.g. the 50th percentile or median),5 where *P* is between 0 and 1, and *n* concentration measurements, the probability that any randomly selected concentration measurements being less than the *P* x 100th percentile is simply *P* and the probability of exceeding the *P* x 100th percentile is 1 - *P.* In light of this, the number of sample values falling below the *P* x 100th percentile out of a set of *n* measurements follows a Binomial distribution with parameters *n* and *P.*

The connection with the Binomial distribution can be used to determine an interval formed by a given pair of order statistics (i.e. ranked values) that will contain the percentile of interest, in this case the 50th percentile. Similarly, the Binomial distribution can also be used in constructing an upper limit (i.e. one-sided) for the percentile (e.g. a 90% upper confidence limit for the 50th percentile of the distribution). The computational formula for the cumulative binomial distribution *B(x:n,p),* representing the probability of getting *x* or fewer successes in *n* trials with success probability *p* is given by

$$Bin(x;n,p) \equiv \sum_{i=0}^{x} \binom{n}{i} p^{i} (1-p)^{n-i}$$

To draw inference regarding the *P* = 50th percentile, we set *p* = .5 in the previous equation. For a one-sided UCL we compute

$$1-a = 1-Bin(U-1;n,.5)$$

beginning from the sample median. We then increase *U* by one until in this case 1 - a. is equal to at least .90. The smallest value of *U* that provides 1 - *a* .9 is then the order statistic (i.e., ranked value) that is the nonparametric 90% UCL for the 50th percentile of the distribution.

---

[4] "If the data do not adequately follow the normal distribution even after logarithm transformation, a nonparametric confidence interval can be constructed." U.S. EPA, 1989

[5] "This interval is for the median concentration (which equals the mean if the distribution is symmetric)." U.S. EPA (1989), page 6-8

3 Illustration

Consider the following most recent 50 data values for PCB (0039) obtained from Premium Gold Parts Washer Solvent-ISO.

Table l
Premium Gold Parts Washer Solvent - 150
50 most recent samples in order of increasing concentration
in ppm

<50.000	<1.000	<0.100	<0.100	<0.100
<0.100	<0.100	<0.100	<0.100	<0.100
<0.100	0.110	0.200	0.200	0.220
0.230	0.260	0.510	0.870	0.880
1.000	1.300	1.500	**1.800**	2.000
2.700	2.700	3.300	5.400	7.000
7.100	12.000	12.300	17.200	19.700
20.000	20.000	21.200	23.600	32.300
51.100	52.500	136.000	211.000	286.000
508.000	635.000	771.000	940.000	2810.000

For n =50, p =.5 and 1 - α = .9, we find that U = 31 is the smallest order statistic that provides 90% confidence or more (1 - α = .941). As such, we select the 31st largest value in Table 1 which is 7.1 ppm as our UCL. Since 7.1 ppm is larger than the standard of 0.7 ppm, then the D039 waste code is required for this waste stream.

4 Conclusion

The data in the following package have been interpreted using the methodology described. The waste codes for each stream were determined as those parameters for which the 90% UCL for the median concentration was above the regulatory limit, based on review of the last two years of samples or the most recent 50 samples, whichever yielded the larger number of samples to consider.

Annual Recharacterization Sample Testing Protocol

Spent Material	Test Parameters	Test Methods
Parts Cleaner Solvent	Flash Point by Pensky- Martens Closed Cup Tester	EPASW8491010
	pH	EPA SW 849 9045
	Apparent Specific Gravity and Bulk Density of Waste	ASTM D5057
	TCLP Metals	EPA SW 84611311, 6010, 7470, 7471
	TCLP Semi-Volatiles	EPA SW 8461311, 8270
	TCLP Volatiles	EPA SW 8461311, 8260
Bottom Sediment (from spent solvent tank and drum washers)	Same as above	Same as above
Spent Immersion Cleaner	Sarne as above	Same as above
Paint and Paint Gun Cleaner Waste	Same as above	Same as above
Aqueous Brake Cleaner	Same as above	Same as above
Dry Cleaning Waste (filter cartridges, filter powder and still bottoms)	Same as above	Same as above

Based on the process generating the waste streams outlined In the above table, 40 CFR 261.24· regulated herbicides and pesticides are not expected to be present; and are therefore, not included in the parameters tested for under the Annual Recharacterization Program.

APPENDIX E

Exhibit E-1 Tank Farm Plan

Exhibit E-2 Drum Washer Schematic and Details

Exhibit E-3 Moorman Brothers Tank Gauge Installation Details

Exhibit E-4 Spent Parts Washer Solvent High Level Alarm System Details

Exhibit E-5 Spent Parts Washer Solvent 16,800 Gallon Vertical Storage Tank

Exhibit E-6 Tank Farm Concrete Construction Details

Exhibit E-7 Class 1B Shelter Construction

Exhibit E-8 Example Inspection Log Sheets

Exhibit E-9 Tank Integrity Test

DIKE VOLUME CALCULATION

FORMULAE USED:

(πr²H)X7.48 GAL.'S\CU. FT.) = TANK DISPLACEMENT VOLUME (GAL.'S)

(LWH) (7.48 GAL.'S\CU. FT.) = DIKE VOLME (GAL.'S)

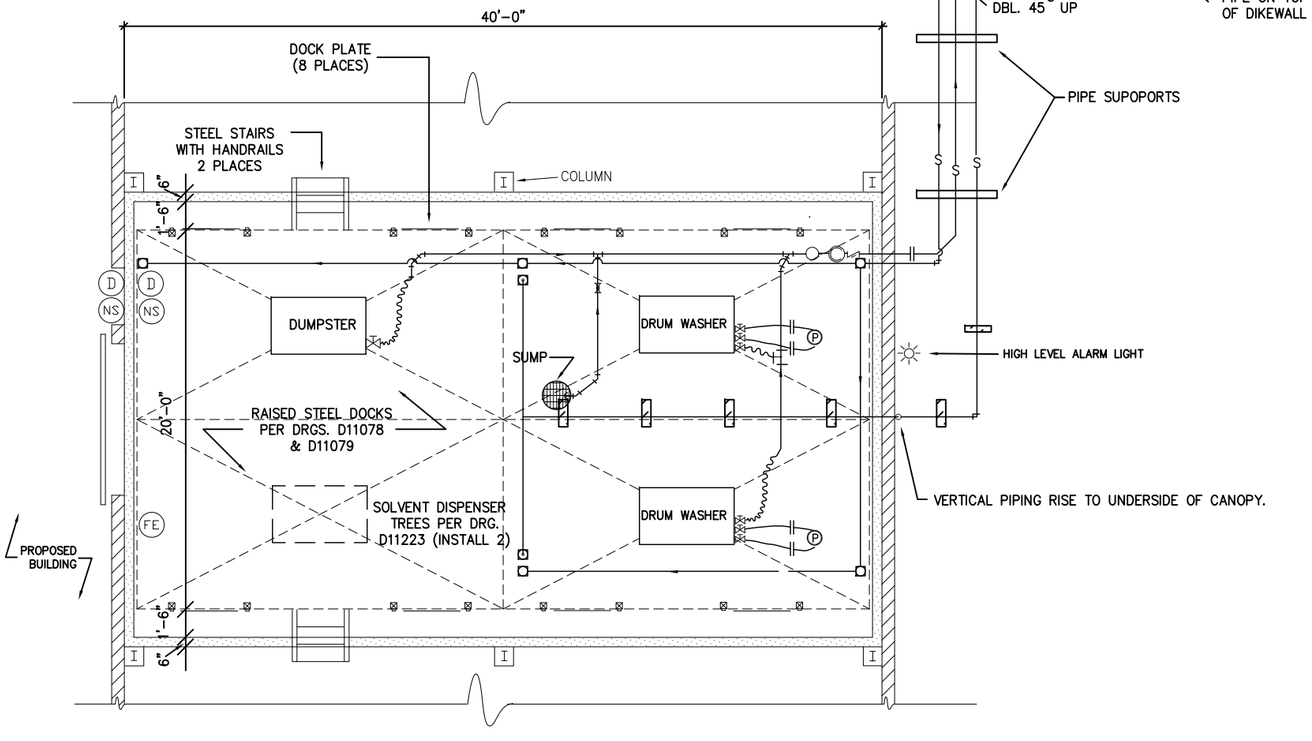
r(TANK RADIUS) = 6.0 FT. (6'0")

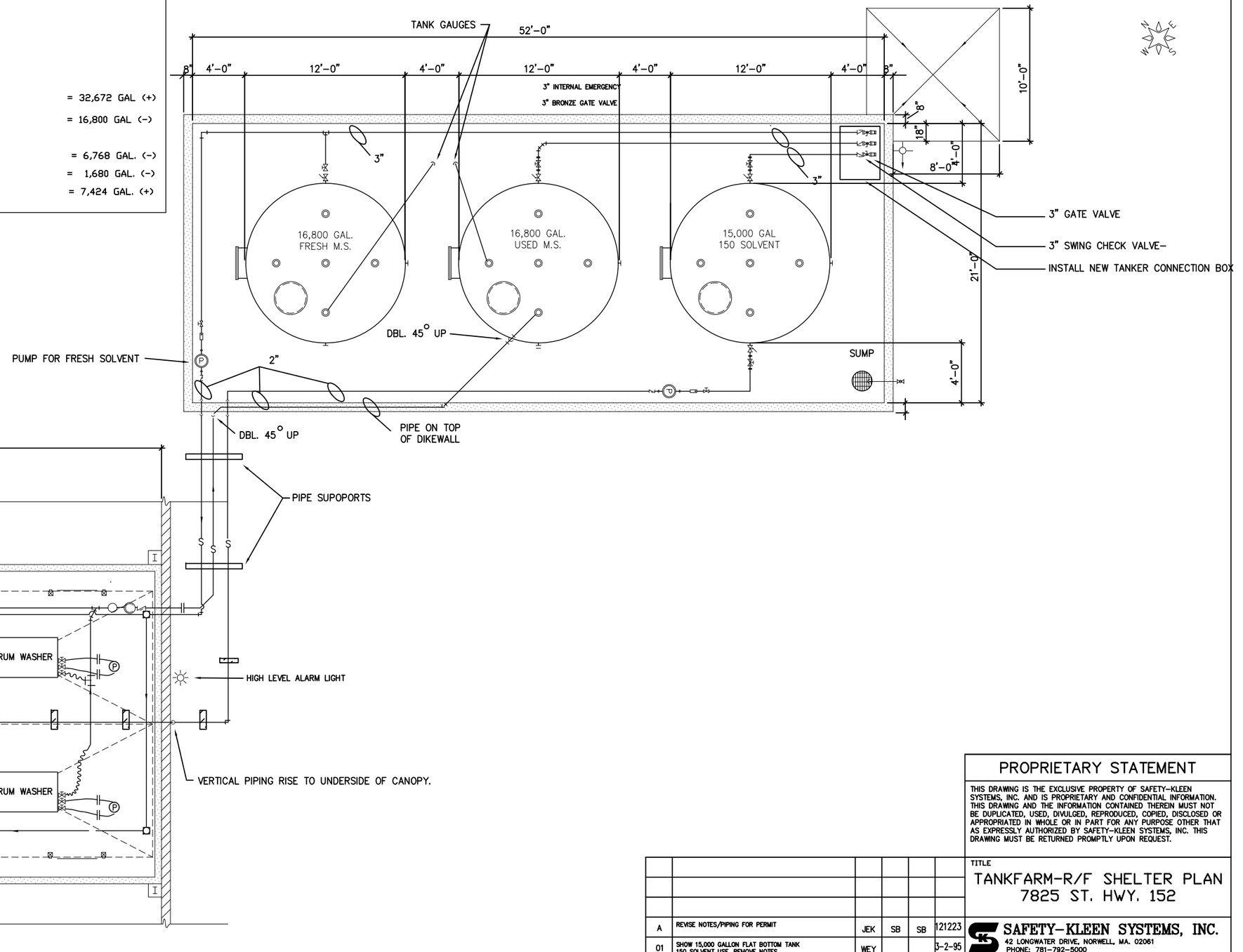
L(DIKE LENGTH) = 52.0 FT. (52'-0" I.D.)

W(DIKE WIDTH) = 21.0 FT. (21'-0" I.D.)

H(DIKE HEIGHT) = 4.0 FT. (4'0")

(52.0 FT.)(21.0 FT.)(4.0 FT.)(7.48 GAL.\CU.FT.)	= 32,672 GAL (+)
VOLUME OF LARGEST TANK WITHIN DIKED AREA:	= 16,800 GAL (-)
TANK DISPLACEMENT VOLUME:	
π (6.0 FT.)² (4.0 FT.)(7.48 GAL.\CU.FT.) =3,384 GAL. X 2 TANKS	= 6,768 GAL. (-)
SAFETY FACTOR : (10% OF LARGEST VOLUME TANK) = 16,800 GAL. (.10)	= 1,680 GAL. (-)
TOTAL (EXCESS)	= 7,424 GAL. (+)





NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	REVISE NOTES/PIPING FOR PERMIT	JEK	SB	SB	121223
01	SHOW 15,000 GALLON FLAT BOTTOM TANK 150 SOLVENT USE. REMOVE NOTES	WEY			3-2-95
00	REVISED SAFETY KLEEN DRAWING TO CADD AS DATED REPLACES SAFETY KLEEN DRAWING D11603	JV			3-8-91

REVISIONS

TITLE

TANKFARM-R/F SHELTER PLAN
7825 ST. HWY. 152

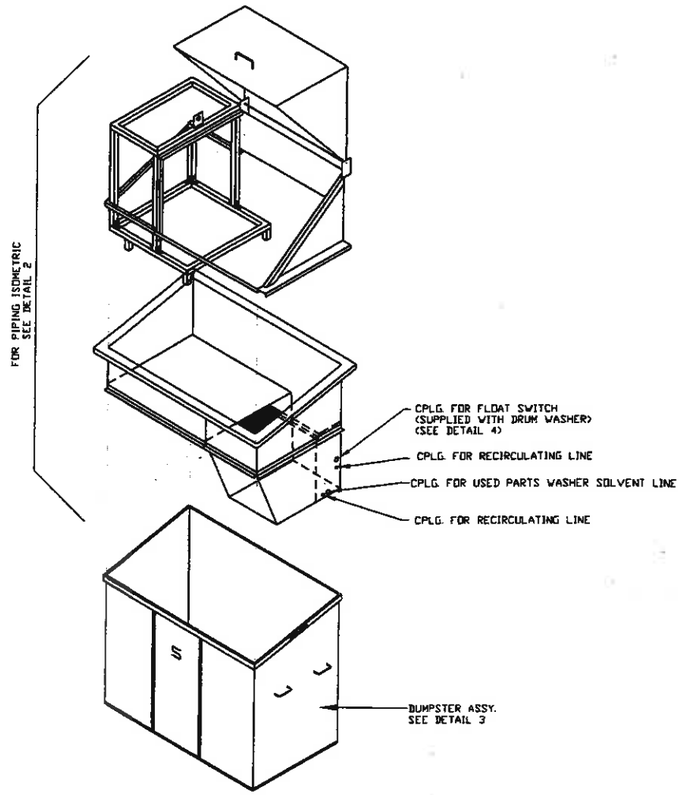
SAFETY-KLEEN SYSTEMS, INC.
42 LONGWATER DRIVE, NORWELL, MA. 02061
PHONE: 781-792-5000

SCALE	BY	CHKD	P.E. APPR	OP. APPR	DATE
1/4" = 1'-0"	RD	-	-	-	10-23-86

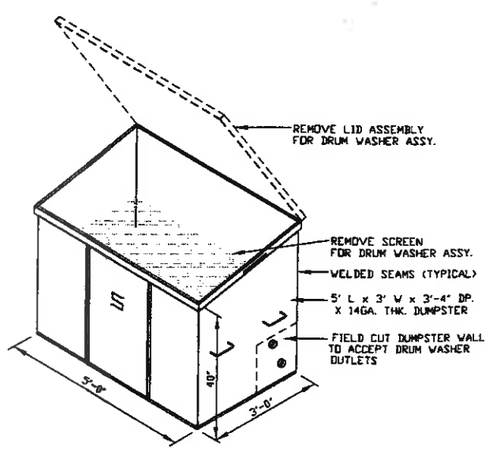
SERVICE CENTER BRANCH AT: OKLAHOMA CITY, OK

STD-DWG-REV NO.: 7104-4100-300

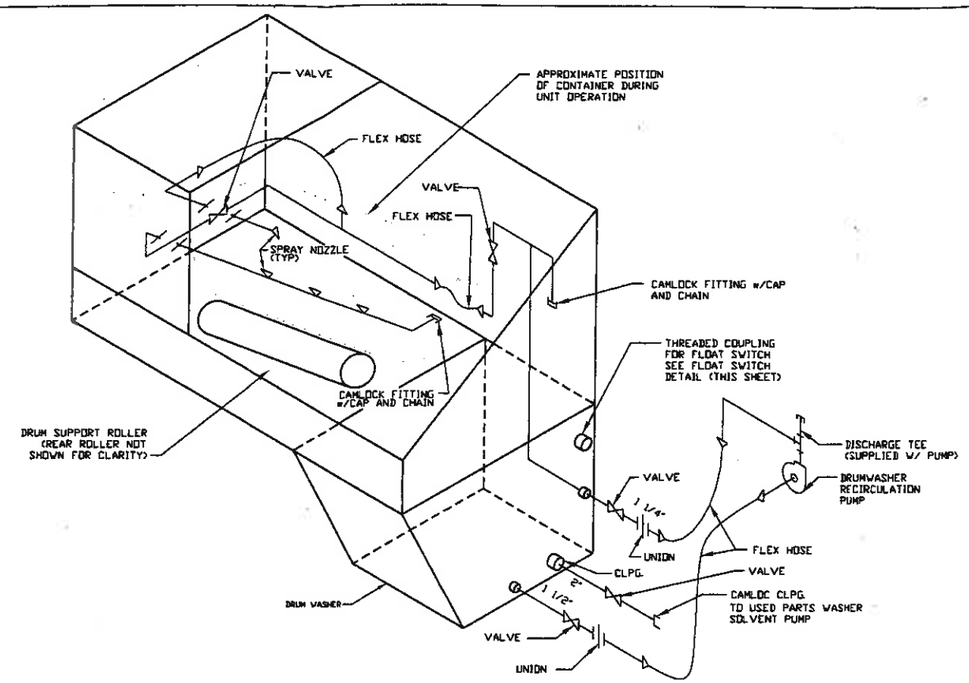
DUMPSTER/BARREL WASHER ASSY - DETAIL 1



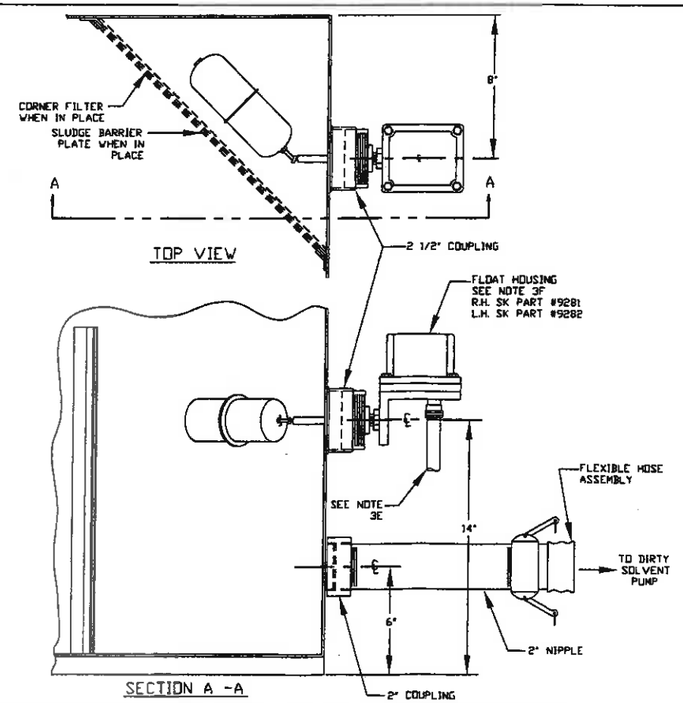
DUMPSTER ASSY. - DETAIL 3



BARREL WASHER PIPING ISOMETRIC - DETAIL 2



FLOAT SWITCH INSTALLATION - DETAIL 4



GENERAL NOTES

1) THE BARREL WASHER UNIT AND DUMPSTER ARE SUPPLIED BY SAFETY-KLEEN CORP. AND COMBINED BY CONTRACTOR. RECIRCULATING PUMP, AND VALVES FOR DRUM WASHER ARE SUPPLIED BY SAFETY-KLEEN CORP. AND INSTALLED WITH CONTRACTOR SUPPLIED PIPE UNIONS AND HOSES.

9. ALL ITEMS WITH SAFETY-KLEEN PART NO. REFERENCES WILL BE SUPPLIED TO CONTRACTOR.

3. FLOAT SWITCH INSTALLATION INSTRUCTIONS

A. TAKE FLOAT SWITCH AND WRAP CLOCKWISE WITH 2 TEFLON WINDS OF TAPE AND INSTALL INTO 2 1/2" COUPLING ON OUTSIDE OF DUMPSTER

B. TAKE FLOAT AND THREAD IT INTO THE FLOAT SWITCH FROM THE INSIDE SHAFT OF THE DUMPSTER AND TIGHTEN SECURELY.

C. RELEASE SHIPPING BRACKET BY REMOVING SCREW AND DISCARDING BRACKET.

D. FLOAT TRAVEL SETTING ADJUSTMENTS CAN BE ACCOMPLISHED BY LOOSENING ADJUSTMENT SCREWS. THE FLOAT TRAVEL ARC SHOULD BE SET AT 10° TRAVEL UP AND 30° TRAVEL DOWN. (SEE CALIBRATION ON DIAL). SEE RIGHT SIDE VIEW.

E. FLOAT SWITCH SHOULD BE WIRED UP ACCORDING TO MFGRS. SPECS AND IN COMPLIANCE WITH ANY LOCAL CODES. (USE RIGID CONDUIT THROUGHOUT).

F. FLOAT SWITCH TO BE INSTALLED ON SAME SIDE OF DUMPSTER AS DRAIN LINE. INSTALLATION SHOWN IS FOR RIGHT HAND SIDE OF DUMPSTER. FLOAT SWITCH IS SQUARE D CLASS 9037 HR - 3 (RIGHT HAND) OR HR - 4 (LEFT HAND).

G. RE-ADJUST FLOAT STOPS TO THOSE SHOWN ON RIGHT SIDE VIEW.

H. WHEN DUMPSTER DOES NOT HAVE A 2 1/2" COUPLING, ONE SHOULD BE ON (LIQUID TIGHT) TO DIMENSIONS SHOWN.

PROPRIETARY STATEMENT

Project Solutions Companies
1390 Boone Industrial Drive • Suite 200 • Columbia • MO 65202
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

NO.	DESCRIPTION	BY	CHK	APPR	DATE
B	REVISE FOR SUB-PART BB	JEK	TB	-	13104
A	NEW RELEASE	MBH	K.JH	CR	021595

REVISIONS

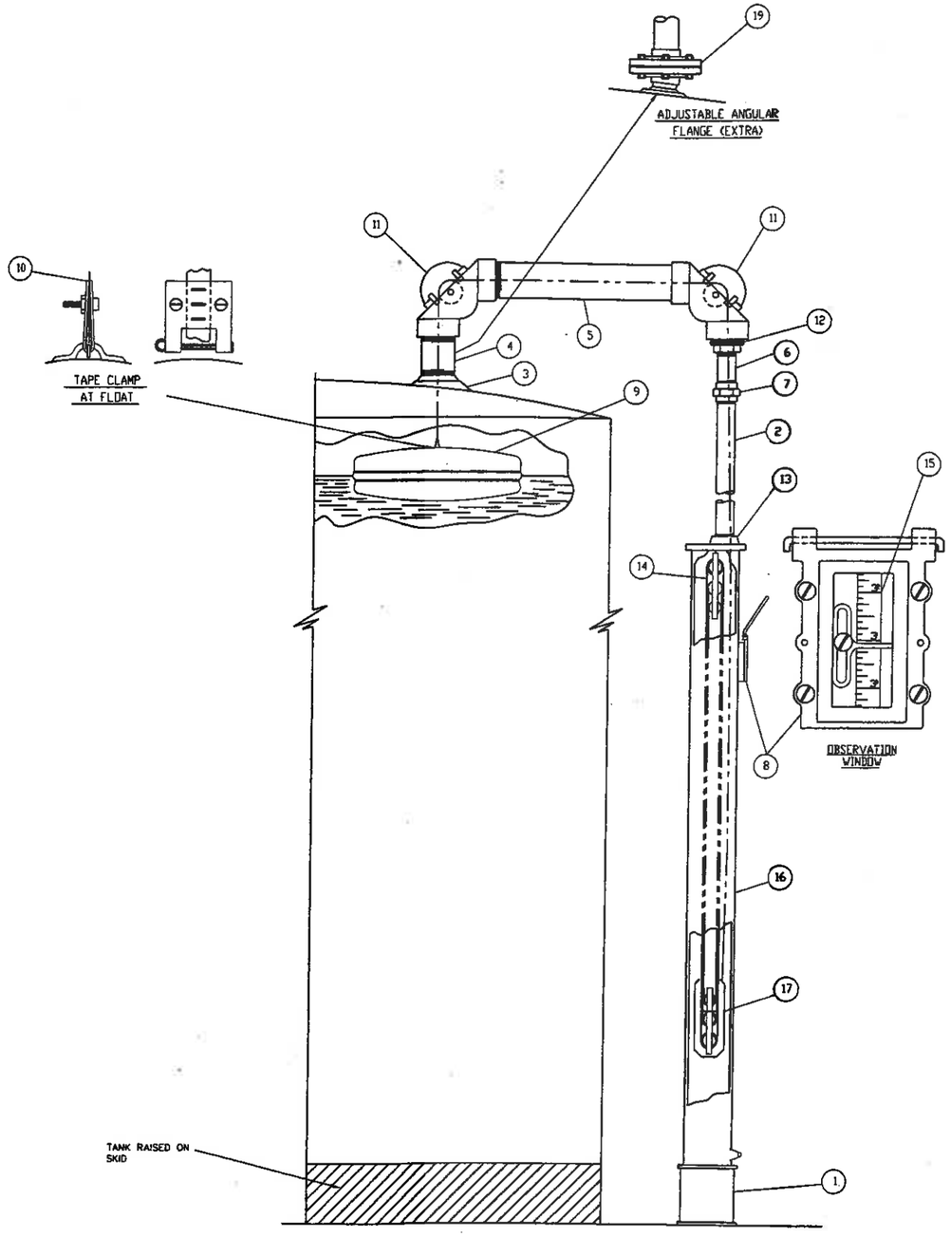
TITLE
DRUM WASHER/DUMPSTER ISOMETRIC

SAFETY-KLEEN SYSTEMS, INC.
5400 LEGACY DR. CLUSTER III, BLDG. J PLANO, TX. 75024 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
NONE	MBH	K.JH	CR		02-06-95

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
OKLAHOMA CITY, OK.	7104-5600-299	B

051094



MODEL 7-S VERTICAL BULK STORAGE TANK GAUGE

MATERIAL LIST
MODEL 7-S

1. GAUGE HOUSING BASE SUPPORT.
2. 1" GALVANIZED PIPE (CUT TO LENGTH).
3. TANK ROOF FLANGE.
4. 2" TANK OPENING PIPE.
5. 2" GALVANIZED PIPE (CUT TO LENGTH).
6. 1" GALVANIZED NIPPLE (ANY LENGTH).
7. 1" GALVANIZED UNION.

	PART NAME	PART NO.	QUANTITY PER UNIT
8.	OBSERVATION WINDOW ASSEMBLY	A-34-A-38	1
9.	FLOAT	V-75	1
10.	STAINLESS STEEL TAPE CLAMP & SCREWS	V-93	1
11.	ELBOW ASSEMBLY COMPLETE	A-30, A-33	2
12.	2" TO 1" REDUCING BUSHING		1
13.	ECCENTRIC CAP COMPLETE WITH NUTS & BOLTS	V-71	1
14.	PULLEY RACK ASSEMBLY	V-73	2
15.	LUFKIN STAINLESS STEEL HIGH VISIBILITY TAPE	V-49	1
16.	RUST-PROOFED STEEL GAUGE HOUSING	V-77	1
17.	COUNTERWEIGHT	V-72	2
18.	CONDENSATION DRAIN PLUG		1
	FRAME & LID ASSEMBLY FOR OBSERVATION WINDOW	A-34, A-38	1
	GASKETS - SET FOR OBSERVATION WINDOW	V-81, V-82	1
	GASKET - ELBOW CAP	V-83	2
	GASKET - V-71 ECCENTRIC CAP	V-84	1
	GLASS - WINDOW	V-86	1
	STAINLESS STEEL INDICATOR FINGER FOR OBSERVATION WINDOW	V-94	1
	WIRE PIN - STAINLESS STEEL	V-96	5

Project Solutions Companies

1390 Boone Industrial Drive • Suite 200 • Columbia • MO 65202 • Phone: (573) 443-7100 • Fax: (573) 443-7181 •

GENERAL NOTES

1. ACTUAL EQUIPMENT CONFIGURATION MAY VARY DUE TO MAINTENCE/ UPKEEP OF FACILITY.

NO.	DESCRIPTION	BY	CHK	APPR	DATE
B	REVISE FOR SUB-PART BB	JEK	TB	-	13104
A	RELEASED FOR PART "B" PERMIT	MBH	KJM	-	070292

REVISIONS

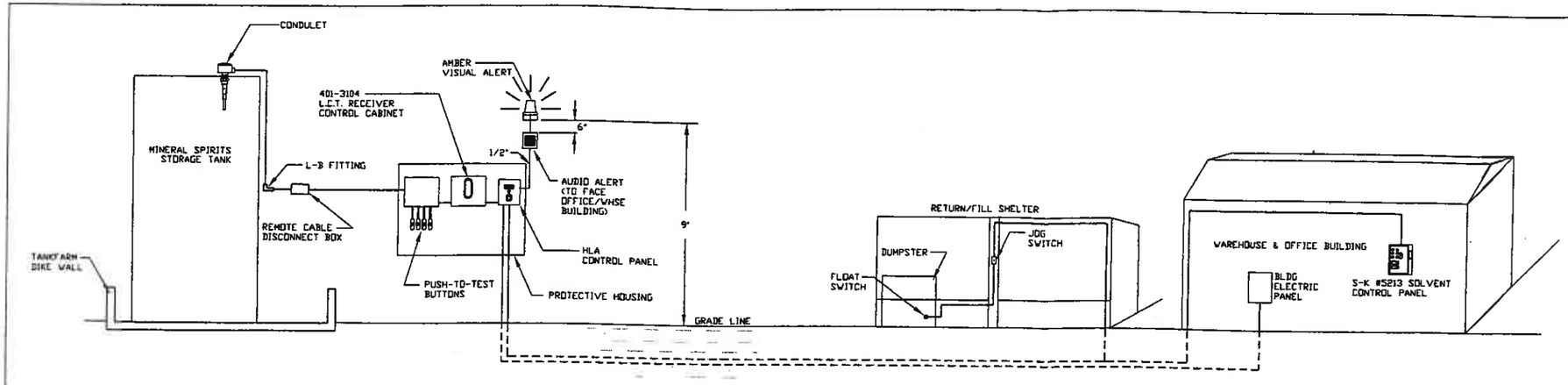
TITLE: MOORMAN BROS. TANK GAUGE DET.

SAFETY-KLEEN SYSTEMS, INC.
5400 LEGACY DR. CLUSTER III, BLDG. 3 PLANO, TX. 75024 800-669-5740

SCALE	BY	CHKD	APPR	OP. APPR	DATE
N.T.S.	MBH	KJM	-	-	05-30-92

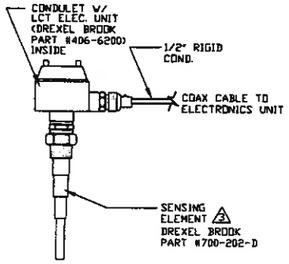
SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
OKLAHOMA CITY, OK.	7104-4100-298	B

01992



HIGH LEVEL ALARM SYSTEM DIAGRAM

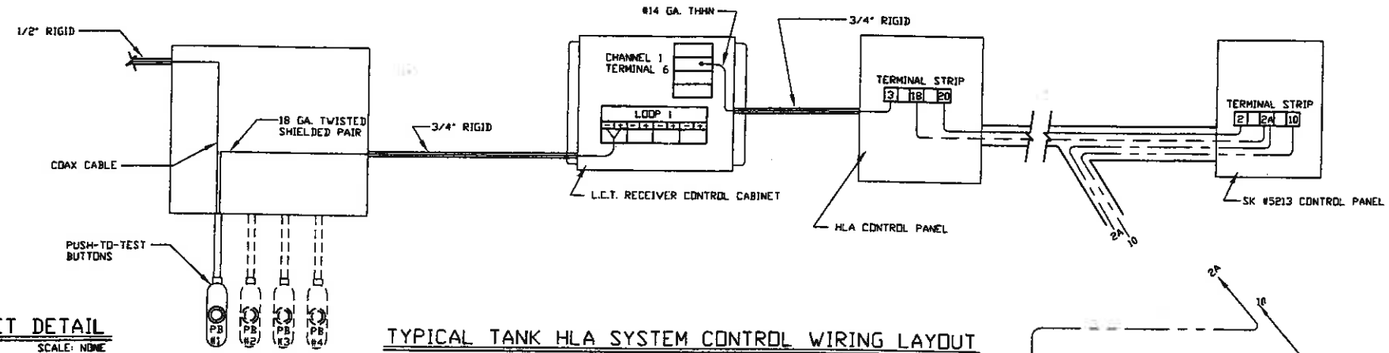
SCALE: NONE



L.C.T. SENSING ELEMENT ASSEMBLY

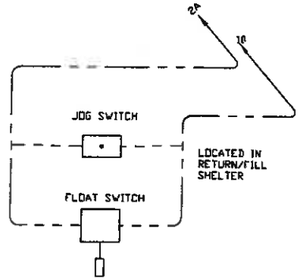
L.C.T. SENSING ELEMENT AND CONDULET DETAIL

SCALE: NONE



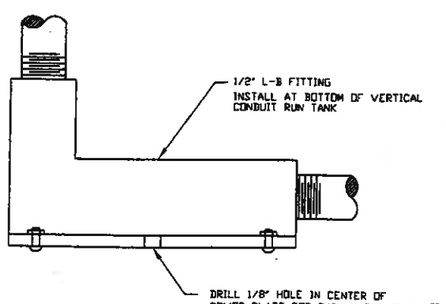
TYPICAL TANK HLA SYSTEM CONTROL WIRING LAYOUT

SCALE: NONE



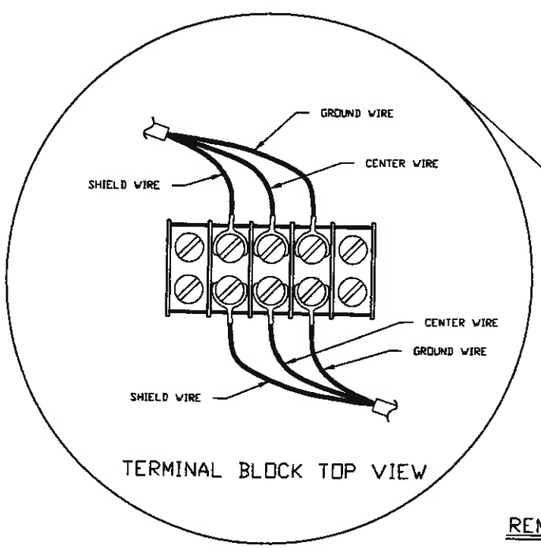
RETURN/FILL WIRING DETAIL

SCALE: NONE

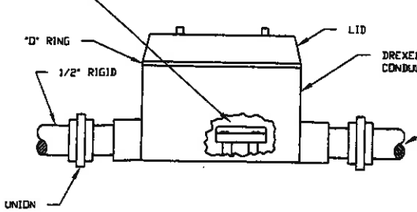


L-B FITTING INSTALLATION DETAIL

SCALE: NONE



TERMINAL BLOCK TOP VIEW



REMOTE CABLE DISCONNECT BOX DETAIL

SCALE: NONE

NO.	DESCRIPTION	BY	CHK	APPR	DATE

REVISIONS

GENERAL NOTES

1. L. C. T. = LEVEL CONTROL TRANSMITTER
2. ALL ELECTRICAL WITHIN 10 FEET OF TANK TO B CLASS 1, DIV. 2, PER LOCAL CODE. SEE SITE UTILITY PLAN FOR ADDITIONAL SPECIFICATIONS.
3. DO NOT INSTALL L. C. T. SENSING ELEMENT IN COUPLING IN CENTER OF TANK.
4. THIS DRAWING IS SCHEMATIC AND SHOWS TYPICAL INSTALLATION DETAILS ONLY.

PROPRIETARY STATEMENT

Project Solutions Companies
1390 Boone Industrial Drive • Suite 200 • Columbia • MO 65
• Phone: (573) 443-7100 • Fax: (573) 443-7181

TITLE

WASTE MINERAL SPIRITS HLA SYSTEM DIAGRAM

SAFETY-KLEEN SYSTEMS, IN
5400 LEGACY DR. CLUSTER III, BLDG. 3 PLANO, TX. 75024 800-669-

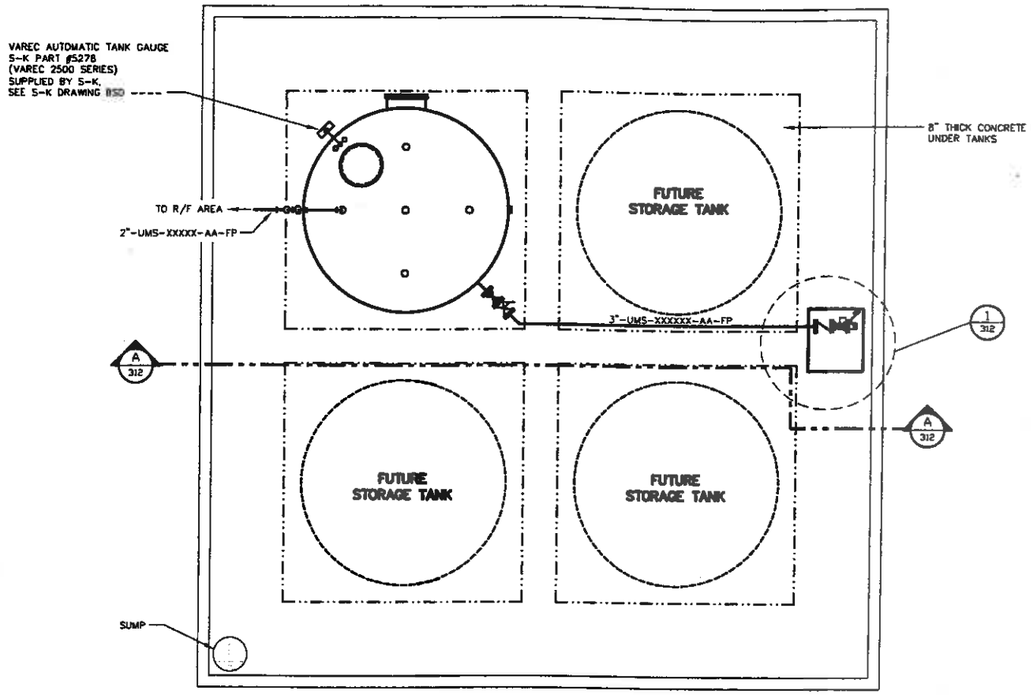
SCALE	BY	CHKD	P.E. APPR	OP. APPR	DATE
NONE	QuesTec				4-2

SERVICE CENTER LOCATION: ~~TULSA, OK.~~ OKC

SC-DWG-REV NO.: 7105-9100-499

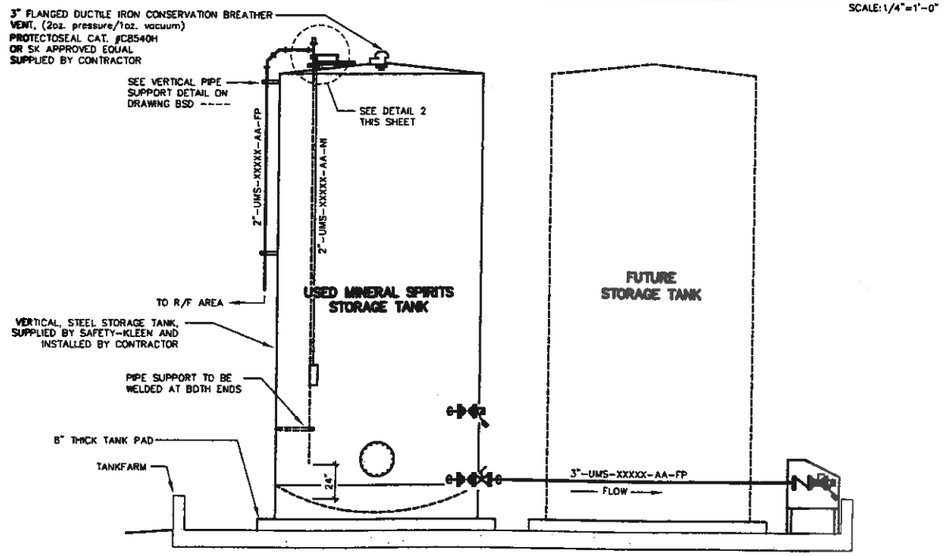
SHEE

-1-92 11:00am D13.DWG



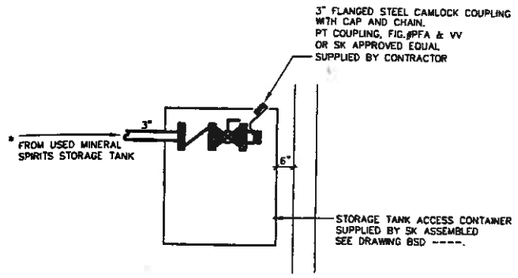
TANKFARM PLAN

SCALE: 1/4"=1'-0"



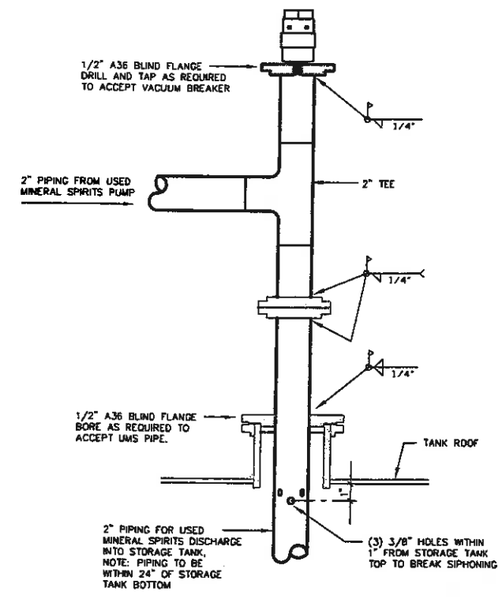
A/312 TANKFARM SECTION

SCALE: 1/4" =1'-0"



* (UMS PIPING LOCATION MAY VARY IN ACCESS CONTAINER)

1/312 USED MINERAL SPIRITS TANK ACCESS DETAIL



2/312 TANK DOME PIPING PENETRATION DETAIL

GENERAL NOTES

1.) PIPING TO CONFORM TO ASME B31.3, REFERENCE SAFETY-KLEEN CORP.'S PIPING SPECIFICATIONS, SECTION 15060.

2.) REFERENCE SAFETY-KLEEN CORP.'S PROJECT MANUAL FOR ALL SPECIFICATIONS.

LEGEND

UMS = USED MINERAL SPIRITS

INDICATES CLOSED BALL VALVE

INDICATES CLOSED GATE VALVE

NOTE: THESE VALVES TO BE NORMALLY CLOSED UNLESS PROCESS IS IN OPERATION.

PROPRIETARY STATEMENT

Project Solutions Companies
2005 West Broadway • Suite 210 • Columbia • MO 65203
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

NO.	DESCRIPTION	BY	CHK	APPR	DATE
B	ADDED PLAN VIEW, REMOVED EQUIP. SCHED.	RD	KJM		081693
A	ISSUED FOR REVIEW	JD	KJM		070893

REVISIONS

TITLE

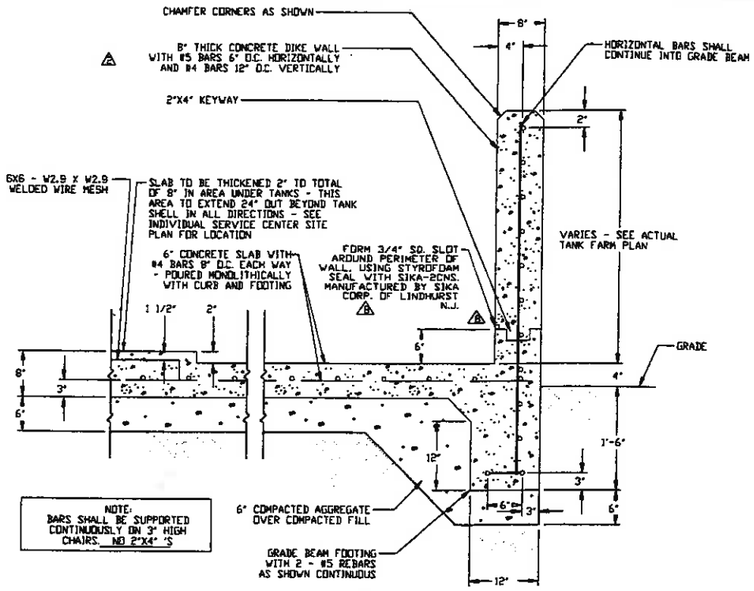
USED MINERAL SPIRITS VERTICAL STORAGE TANK PIPING DETAILS

Safety-Kleen Corp.
1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123
PHONE (708)697-8460

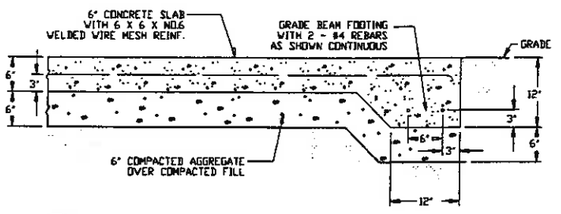
SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
NONE	JD				8-12-91

SERVICE CENTER STANDARDS	STD-DWG NUMBER	REV. NO.
MECHANICAL	BSD-312	B

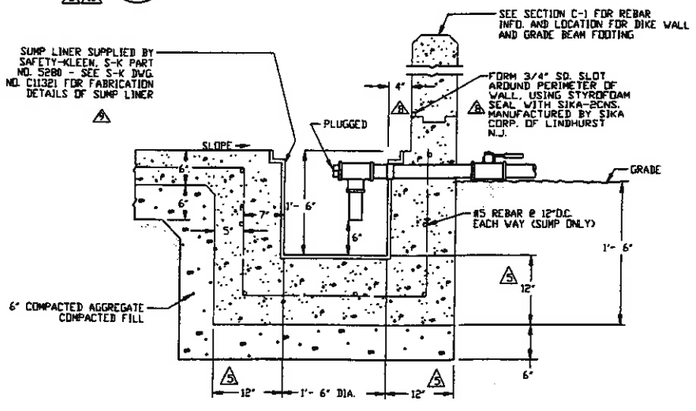
08-16-93



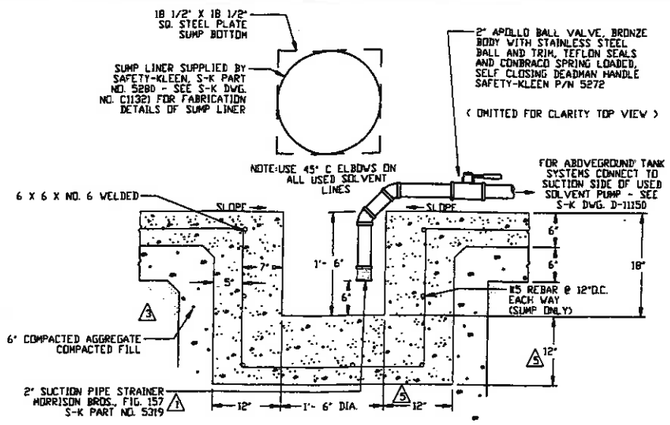
C1 SECTION C-1: TANK SLAB & DIKE WALL CONSTRUCTION DETAIL
SCALE: 1"=1'- 0"



C2 SECTION C-2 : SLAB CONSTRUCTION DETAIL
SCALE: 1"=1'- 0"

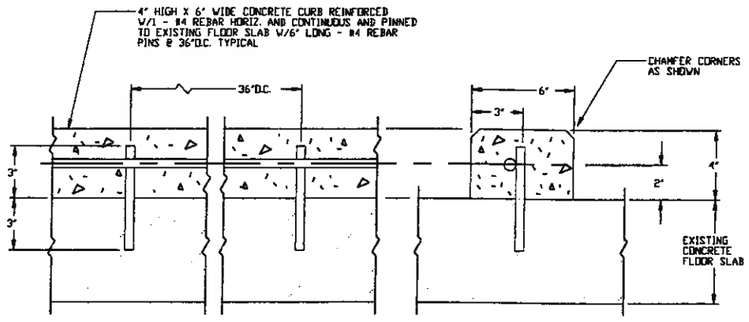


C3 SECTION C-3: TANK FARM SUMP CONSTRUCTION DETAIL
SCALE: 1"=1'- 0"

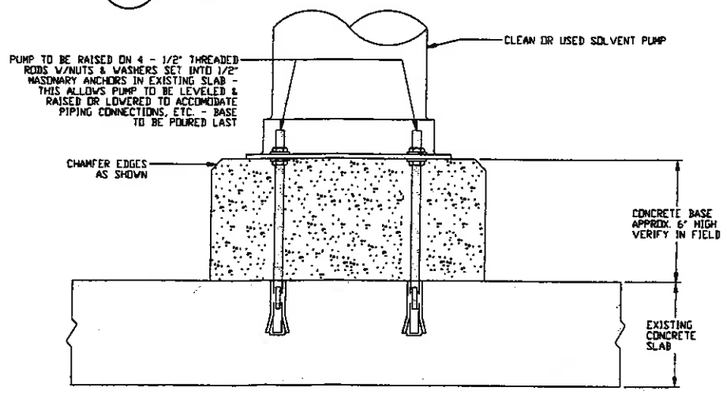


C4 SECTION C-4: RETURN & FILL AREA SUMP CONSTRUCTION DETAIL
SCALE: 1"=1'- 0"

NOTE: FOR AREAS WHERE CURBING IS TO BE INSTALLED, FLOOR SURFACE TO BE CLEANED AND SCRUBBED W/50-50 ACID SOLUTION OR SCARIFIED WITH GRINDER IN PREPARATION FOR EPOXY BONDING AGENT. BONDING AGENT TO BE W.R. MEADOWS INTRALOK ACRYLIC LATEX OR APPROVED EQUAL AND TO BE APPLIED PRIOR TO POURING CURB.



D1 DETAIL D-1: CURB CONSTRUCTION
SCALE: 3" = 1'-0"



D2 DETAIL D-2: PUMP BASE CONSTRUCTION
SCALE: 3"=1'- 0"

GENERAL NOTES

1. THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORP. ANY REPRODUCTION DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITIN
2. THIS DRAWING SUPERCEDES SAFETY-KLEEN DRAWINGS C10240, C10962, D10507, AND D10955
3. SEE INDIVIDUAL SERVICE CENTER PLANS FOR LOCATIONS OF THESE DETAILS
4. CONCRETE TO OBTAIN 3,000 PSI STRENGTH IN 28 DAYS
5. ALL ITEMS WITH SAFETY-KLEEN PART NO. REFERENCES WILL BE SUPPLIED TO CONTRACTOR.
6. ALL CONCRETE WORK SHALL CONFORM TO THE REQUIREMENTS OF ACI-301-84 "SPECIFICATIONS FOR STRUCTURAL CONCRETE FOR BUILDINGS".ALL CONCRETE SHALL HAVE Fc=3,000 PSI. ALL CONCRETE EXPOSED TO WEATHER SHALL HAVE 5-7% AIR ENTRAINMENT. COARSE AGGREGATE SHALL CONFORM TO NO. 57 IN ACCORDANCE WITH ASTM C-33.
7. ALL CONCRETE AREA'S TO BE COVERED WITH BURLAP AND KEPT CONTINUOUSLY MOIST FOR A MINIMUM PERIOD OF THREE DAYS IMMEADIATLY AFTER PLACEMENT & FINISHING.
8. SLOPE ALL CONCRETE SLABS TO SUMP AS SHOWN ON PLAN(RAISED SLAB UNDER TANKS TO BE LEVEL).
9. ALL FOOTINGS SHALL BEAR ON UNDISTURBED SOIL OR COMPACTE FILL. MINIMUM SOIL BEARING PRESSURE TO BE 2,500 PSF.
10. TOP OF ALL EXPOSED CONCRETE WALL POURS TO BE SCREENED AND FINISHED PERFECTLY LEVEL FOR PROPER ARCHITECTURAL APPEARANCE.
11. SUMPS TO BE TESTED BY CONTRACTOR WITH WATER AT FULL HEIGHT FOR A PERIOD OF 24 HOURS, WITH NO LEAKAGE ALLOWE
12. ALL FLOORS AND SUMPS SHALL BE COATED WITH TWO COATS OF SIKAGARD 62, MANFACTURED BY SIKA CORP. LYNDHURST,N.J. OR CONCRESIVE 1305, MANUFACTURED BY ADHESIVE ENGINEERING CO. SAN CARLOS,CA. COATING SHALL HAVE A SLIP-RESISTANT FINISH PER MANUFACTURER'S SPECIFICATIONS. MANUFACTURER'S RECOMMENDATIONS FOR SURFACE PREPARATION AND APPLICATION SHALL BE STRICTLY FOLLOWED. ALLOW CONCRETE SUBSTRATE TI CURE AT LEAST 30 DAYS PRIOR TO APPLICATION OF COATING.

PROPRIETARY STATEMENT

Project Solutions Companies
1390 Boone Industrial Drive • Suite 200 • Columbia • MO 652
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

NO.	DESCRIPTION	BY	CHK'D	APPR	DATE
11	RMV'D MESH FROM SECT. C3	RD			4/14/
10	ADDED 3/4" SLOT & LABEL C-1 & C-3	RD			3/7/
9	REVISED SECTION C-1	RD			7/5/
8	ADDED COUPLING NOTE	RD			3/29/
7	THICKENED CONC. IN SUMP SECT.S C-2 & C-4	RD			2/22/
6	RMV'D 2" DRAIN LINE & BALL VALVE/S	RD			5/18/
5	RMV'D GAL DRAIN LINE FROM SUMP SECT. C-4	RD			8/6/
4	VERT. BAR SPACING WAS 48"	WLJ			10/25/
3	ADDED NOTE 5 & PIPE STRAINER	WLJ			10/23/
2	ADDED NOTES 6 THRU 12	RD			7/27/89
1	REMOVED DRAIN PLUG&MOVED CORRECTED VERSION OF SUMP DRAFTING SUPPORT	RD			6\20\89

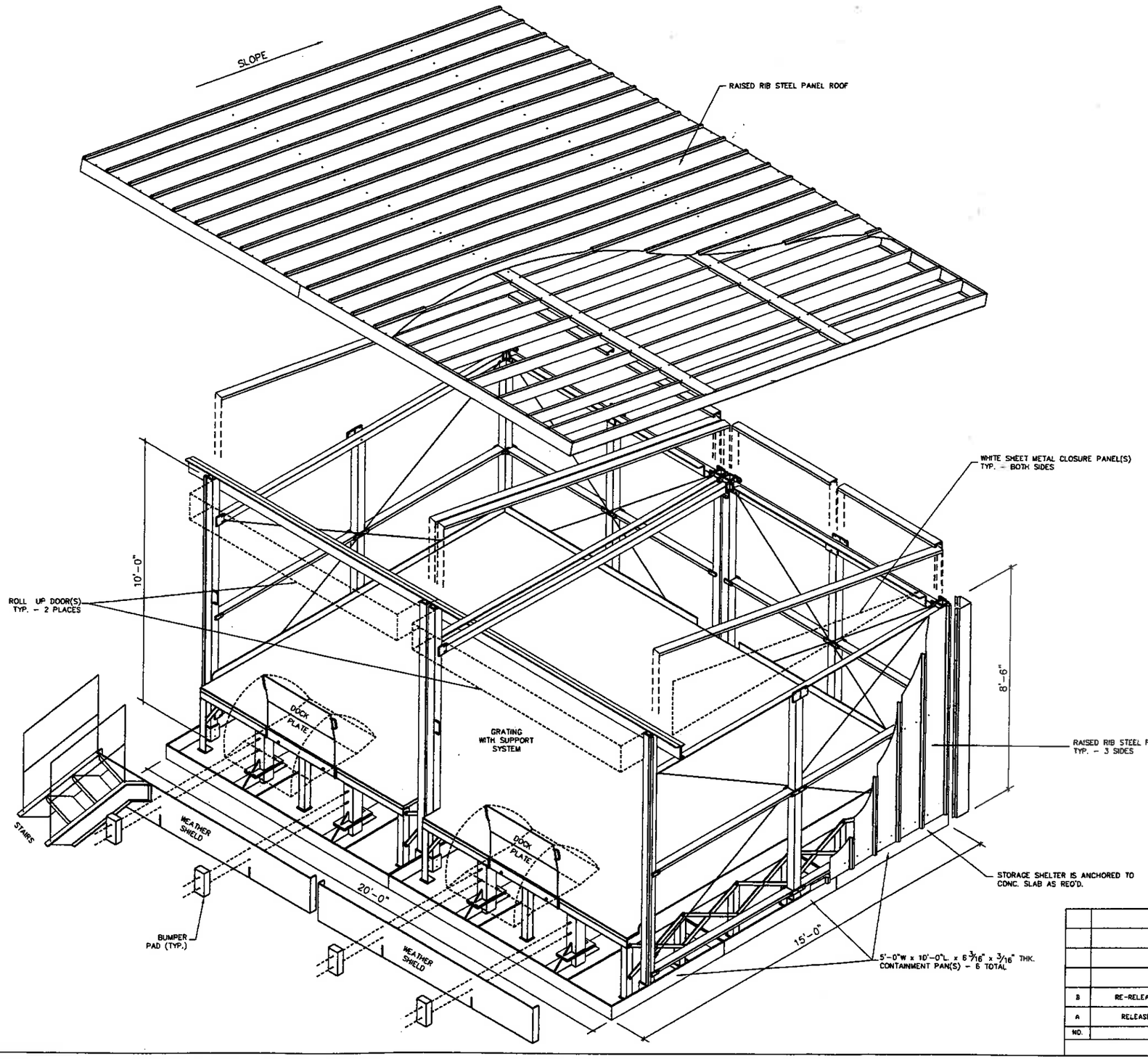
REVISIONS

TITLE: TYPICAL CONCRETE CONSTRUCTION DETAILS

SAFETY-KLEEN SYSTEMS, INC.
5400 LEGACY DR. CLUSTER III, BLDG. 3 PLANO, TX. 75024 800-669-5740

PROJ. ENG. APPR.	OPERATIONS APPR.	SCALE	DRAWN	DATE
		AS SHOWN	NVJ\-PBG	12/15/8

BRANCH: OKLAHOMA CITY, OK.
DRAWING NO.: 7104-9900-500
REV.: K



GENERAL NOTES

1. ACTUAL FRAMING CONFIGURATION MAY VARY DUE TO MAINTENANCE/ UPKEEP OF FACILITY.
2. CHESAPEAKE, VA BRANCH FACILITY US E.P.A. No. VAD000737346.

PROPRIETARY STATEMENT

Project Solutions Companies
1390 Boone Industrial Drive • Suite 200 • Columbia • MO 65202
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

NO.	DESCRIPTION	BY	CHK	APPR	DATE
B	RE-RELEASED FOR PART "B" PERMIT	MBH	KJH	DP/SW	122294
A	RELEASED FOR PART "B" PERMIT	MBH	KJH	-	011993

REVISIONS

TITLE

CLASS 1B STORAGE BLDG. ISOMETRIC - EXISTING

SAFETY-KLEEN SYSTEMS, INC.
5360 LEGACY DR. BLDG.2 SUITE 100 PLANO, TX 75024
PHONE: 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1/2"=1'-0"	MBH	KJH	-	-	11-25-92

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
OKLAHOMA CITY, OK.	7104-7100-600	B

INSPECTION LOG SHEET FOR: **DAILY INSPECTION OF STORAGE TANK SYSTEM**

SPECTOR'S NAME:_____

INSPECTOR'S SIGNATURE:_____

	MON	TUE	WED	THU	FRI
DATE (MM/DD/YY)					
TIME (AM/PM)					
INSPECTOR'S INITIALS					
STORAGE TANKS: Tanks must NEVER be more than 95% full)					
Clean 150 Tank (in/gal)					
Dirty Tank (in/gal)					
Clean 150 Tank (in/gal)					

Tank Exterior A N A N A N A N A N
If "N," circle appropriate problem:
Rusty or loose anchoring, lack of grounding, wet spots, discoloration, leaks, distortion,
Other:

High Level Alarms: A N A N A N A N A N
If "N," circle appropriate problem:
Malfunctioning, "Power On" light, malfunctioning siren/strobe light,
Other:

ame Gauges A N A N A N A N A N
If "N," circle appropriate problem:
Disconnected, sticking, condensation,
Other:

CONTAINMENT AREA (Tank Dike):

Bottom and Walls: A N A N A N A N A N
In "N," circle appropriate problem:
Cracks, debris in dike, open drums in dike, ponding/wet spots/stains, deterioration, displacement, leaks
Other:

Ridge Piping and Supports A N A N A N A N A N
In "N," circle appropriate problem:
Distortion, corrosion, paint failure, leaks,
Other:

Tanker Coupling Pan A N A N A N A N A N
If "N," circle appropriate problem:
Pan free of residue
Other:

(IF AN ITEM IS NOT ACCPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE "ACCEPTABLE/NOT ACCEPTABLE" ROW)

*** A = ACCEPTABLE** **N = NOT ACCEPTABLE**

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS:_____

INSPECTION LOG SHEET FOR: **DAILY INSPECTION OF STORAGE TANK SYSTEM**

INSPECTOR'S NAME:_____

INSPECTOR'S SIGNATURE:_____

	MON	TUE	WED	THU	FRI
DATE (MM/DD/YY)					
TIME (AM/PM)					
INSPECTOR'S INITIALS					

PIPING SYSTEMS (Outside Dike):

Rigid Piping Outside of Dike	A	N	A	N	A	N	A	N	A	N
In "N," circle appropriate problem: Distortion, corrosion, paint failure, leaks Other:										
Pipe Bridge or Supports	A	N	A	N	A	N	A	N	A	N
In "N," circle appropriate problem: Paint failure, physical damage, loose joints Other:										
Tanker Connections	A	N	A	N	A	N	A	N	A	N
In "N," circle appropriate problem: Valves open, damaged or leaking valves, cap not installed, check valves not operational Other:										

IF AN ITEM IS NOT ACCPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE "ACCEPTABLE/NOT ACCEPTABLE" ROW)

A = ACCEPTABLE **N = NOT ACCEPTABLE**

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS:_____

INSPECTION LOG SHEET FOR: **DAILY INSPECTION OF STORAGE TANK SYSTEM**

.SPECTOR'S NAME:_____

INSPECTOR'S SIGNATURE:_____

DATE (MM/DD/YY)	MON	TUE	WED	THU	FRI
TIME (AM/PM)					
INSPECTOR'S INITIALS					

Pump Seals: A N A N A N A N A N
If "N," circle appropriate problem:
Leaks, Other:

Motors: A N A N A N A N A N
If "N," circle appropriate problem:
Overheating, Other:

Fittings: A N A N A N A N A N
If "N," circle appropriate problem:
Leaks, Other:

Valves: A N A N A N A N A N
If "N," circle appropriate problem:
Leaks, Sticking, Other:

Hose Connections and Fittings: A N A N A N A N A N
If "N," circle appropriate problem:
Cracks, Loose, Leaks, Other:

Hose Body: A N A N A N A N A N
If "N," circle appropriate problem:
Crushed, Cracked, Thin Spots, Leaks, Other:

:TURN AND FILL STATION:

Wet Dumpster: A N A N A N A N A N
In "N," circle appropriate problem:
Excess sediment build-up, leaks, rust, split seams, distortion, deterioration, excess debris, Other:

Secondary Containment: A N A N A N A N A N
In "N," circle appropriate problem:
Excess sediment/liquid, leaks, deterioration, distortion, excess debris, Other:

Loading/Unloading Area: A N A N A N A N A N
In "N," circle appropriate problem:
Cracks, ponding/wet spots, deterioration, Other:

(IF AN ITEM IS NOT ACCPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE "ACCEPTABLE/NOT ACCEPTABLE" ROW)

*** A = ACCEPTABLE** **N = NOT ACCEPTABLE**

OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS:_____

INSPECTION LOG SHEET FOR: **DAILY INSPECTION OF WAREHOUSE DRUM STORAGE AREA (SE corner of warehouse)**
(A log must be completed for each storage area)

INSPECTOR'S NAME: _____

INSPECTOR'S SIGNATURE: _____

DESCRIPTION OF AREA: SOUTHEAST CORNER OF WAREHOUSE

PERMITTED STORAGE VOLUME: 1795 GALLONS

	MON	TUE	WED	THU	FRI
DATE (MM/DD/YY)					
TIME (AM/PM)					
INSPECTOR'S INITIALS					
CONTAINERS:					
55 GAL					
30 GAL					
16 GAL					
5 GAL					
TOTAL VOLUME IN GALLONS)					

Total volume A N A N A N A N A N
If "N," circle appropriate problem:
Total volume exceeds the amount for which the facility is permitted,
Other:

Condition of Drums: A N A N A N A N A N
If "N," circle appropriate problem: Missing or Loose lids,
Missing, incorrect or missing labels, rust, leaks, distortion
Other:

Stacking/placement /aisle space A N A N A N A N A N
If "N," circle appropriate problem:
Different from Part B floor plan, containers not on pallets, unstable stacks
Other:

CONTAINMENT AREA:

Curbing, Floor and Sump(s) A N A N A N A N A N
In "N," circle appropriate problem:
Ponding/wet spots, deterioration, cracks, gaps, etc., displacement, leaks,
Other:

Loading/Unloading Area: A N A N A N A N A N
In "N," circle appropriate problem:
Cracks, deterioration, ponding/wet spots,
Other:

(IF AN ITEM IS NOT ACCPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE "ACCEPTABLE/NOT ACCEPTABLE" ROW)
A = ACCEPTABLE N = NOT ACCEPTABLE

ALCULATE TOTAL VOLUMES, USE THE FOLLOWING: M.S., I.C., D.C., AND PAINT WASTE DRUMS HOLD 16 GALLONS

C. BOXES HOLD 10 GALLONS AND PAINT WASTE PAILS HOLD 5 GALLONS.OBSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

INSPECTION LOG SHEET FOR: **DAILY INSPECTION OF DRUM STORAGE AREA (A log must be completed for each storage area)**

ESCRIPTION OF AREA: FRS SHED - SE CORNER OF PROPERTY
PERMITTED STORAGE VOLUME: N/A

INSPECTOR'S NAME & TITLE: _____

	MON	TUE	WED	THU	FRI
DATE (MM/DD/YY)					
TIME (AM/PM)					
INSPECTOR'S INITIALS					
CONTAINERS:					
55 GAL					
30 GAL					
16 GAL					
5 GAL					
TOTAL NUMBER OF CONTAINERS					
TOTAL VOLUME (IN GALLONS)					

al volume A N A N A N A N A N

If "N," circle appropriate problem:
Total volume exceeds the amount for which the facility is permitted, Other:

Condition of Drums: A N A N A N A N A N

If "N," circle appropriate problem:
Missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion, other:

Stacking/placement /aisle space A N A N A N A N A N

If "N," circle appropriate problem:
different from Part B floor plan, containers not on pallets, unstable stacks, Other:

CONTAINMENT AREA:

Curbing, Floor and Sump(s) A N A N A N A N A N

In "N," circle appropriate problem:
Ponding/wet spots, deterioration, cracks, gaps, etc., displacement, leaks, Other:

Loading/Unloading Area: A N A N A N A N A N

In "N," circle appropriate problem:
Cracks, deterioration, ponding/wet spots, other:

(IF AN ITEM IS NOT ACCPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE "ACCEPTABLE/NOT ACCEPTABLE" ROW)
* **A = ACCEPTABLE** **N = NOT ACCEPTABLE**

TO CALCULATE TOTAL VOLUMES, USE THE FOLLOWING: M.S., I.C., D.C., AND PAINT WASTE DRUMS HOLD 16 GALLONS D.C. BOXES HOLD 10 GALLONS AND PAINT WASTE PAILS HOLD 5 GALLONS.

ERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

ISPECTION LOG SHEET FOR: **DAILY INSPECTION OF DRUM STORAGE AREA (A log must be completed for each storage area)**

DESCRIPTION OF AREA: FLAM SHED - SE CORNER OF PROPERTY
PERMITTED STORAGE VOLUME: 2184 GALLONS
ISPECTOR'S NAME & TITLE: _____

	MON	TUE	WED	THU	FRI
DATE (MM/DD/YY)					
TIME (AM/PM)					
INSPECTOR'S INITIALS					
CONTAINERS:					
55 GAL					
30 GAL					
16 GAL					
5 GAL					
TOTAL NUMBER OF CONTAINERS					
TOTAL VOLUME (IN GALLONS)					

al volume A N A N A N A N A N

If "N," circle appropriate problem:
Total volume exceeds the amount for which the facility is permitted, Other:

Condition of Drums: A N A N A N A N A N

If "N," circle appropriate problem:
Missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion, other:

Stacking/placement /aisle space A N A N A N A N A N

If "N," circle appropriate problem:
different from Part B floor plan, containers not on pallets, unstable stacks, Other:

CONTAINMENT AREA:

Curbing, Floor and Sump(s) A N A N A N A N A N

In "N," circle appropriate problem:
Ponding/wet spots, deterioration, cracks, gaps, etc., displacement, leaks, Other:

Loading/Unloading Area: A N A N A N A N A N

In "N," circle appropriate problem:
Cracks, deterioration, ponding/wet spots, other:

(IF AN ITEM IS NOT ACCPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE "ACCEPTABLE/NOT ACCEPTABLE" ROW)
* **A = ACCEPTABLE** **N = NOT ACCEPTABLE**

TO CALCULATE TOTAL VOLUMES, USE THE FOLLOWING: M.S., I.C., D.C., AND PAINT WASTE DRUMS HOLD 16 GALLONS D.C. BOXES HOLD 10 GALLONS AND PAINT WASTE PAILS HOLD 5 GALLONS.

ERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS: _____

SPECTION LOG SHEET FOR: **WEEKLY INSPECTION OF SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES AND MISCELLANEOUS EQUIPMENT**

NSPECTORS NAME/TITLE:_____

INSPECTORS SIGNATURE:_____

DATE (MM/DD/YY)	
TIME (AM/PM)	
INSPECTOR'S INITIALS	

SAFETY AND EMERGENCY EQUIPMENT (WILL BE INSPECTED FOR QUANTITY AND CONDITION)

Fire Extinguishers A N
If "N," circle appropriate problem:
Overdue inspection, inadequately charged, inaccessible, other:

Eyewash and Shower: A N
If "N," circle appropriate problem:
Disconnected/malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain leaking, Other:

First Aid Kit: A N
If "N," circle appropriate problem:
Inadequate inventory, Other:

Spill Clean-up Equipment A N
If "N," circle appropriate problem:
Inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other:

mmunication Devices: A N
If "N," circle appropriate problem:
Inadequate supply of telephones, malfunctioning telephones, malfunctioning intercom, emergency alarm does not work, telephones are not located where needed, other:

Personal Protective Equipment A N
If "N," circle appropriate problem:
Inadequate supply of aprons, gloves, glasses, respirator, Other:

SECURITY DEVICES:

Gates and Locks A N
If "N," circle appropriate problem:
Sticking, corrosion, lack of warning signs, fit, other:

Fence: A N
If "N," circle appropriate problem:
Broken ties, corrosion, holes, distortion, other:

MISCELLANEOUS EQUIPMENT:

Dry Dumpster: A N
If "N," circle appropriate problem:
Rust, corrosion, split seams, distortion, deterioration, excess debris, liquids in unit, other:

(IF AN ITEM IS NOT ACCPLICABLE, ENTER "N/A" AFTER IT AND DRAW A LINE THROUGH THE "ACCEPTABLE/NOT ACCEPTABLE" ROW)

*** A = ACCEPTABLE** **N = NOT ACCEPTABLE**

ORSERVATIONS, COMMENTS, DATE AND NATURE OF ANY REPAIRS:_____

INSPECTION LOG SHEET FOR OKLAHOMA CITY BRANCH
Daily Inspection of Tank Equipment/Subpart BB

Inspector's Name/Title:_____

MONDAY Date: ___/___/___ Time:_____	**TUESDAY** Date: ___/___/___ Time:_____	**WEDNESDAY** Date: ___/___/___ Time:_____	**THURSDAY** Date: ___/___/___ Time:_____	**FRIDAY** Date: ___/___/___ Time:_____

Pump, Flange, or Valve Number	Monday	Tuesday	Wednesday	Thursday	Friday
1. 2" Valve	A N	A N	A N	A N	A N
2. 1½ Valve	A N	A N	A N	A N	A N
3. 1½ Valve	A N	A N	A N	A N	A N
4. Recirculation Pump	A N	A N	A N	A N	A N
5. Trash Pump	A N	A N	A N	A N	A N
6. 2" Valve	A N	A N	A N	A N	A N
7. 1½ Valve	A N	A N	A N	A N	A N
8. 1½ Valve	A N	A N	A N	A N	A N
9. Recirculation Pump	A N	A N	A N	A N	A N
10. 2" Camlock	A N	A N	A N	A N	A N
11. Basket Strainer	A N	A N	A N	A N	A N
12. 2" Swing Check Valve	A N	A N	A N	A N	A N
13. 2" Coupling	A N	A N	A N	A N	A N
14. 2" Flange	A N	A N	A N	A N	A N
15. 2" Elbow	A N	A N	A N	A N	A N
16. 3" Emergency Valve	A N	A N	A N	A N	A N
17. 3" Locking Gate	A N	A N	A N	A N	A N
18. 3" Emergency Valve	A N	A N	A N	A N	A N
19. 3" Gate Valve	A N	A N	A N	A N	A N
20. 3" Flange	A N	A N	A N	A N	A N
21. 3" Flange	A N	A N	A N	A N	A N
22. 3" Swing Check Valve	A N	A N	A N	A N	A N
3. 3" Locking Gate Valve	A N	A N	A N	A N	A N
4. 2" Union	A N	A N	A N	A N	A N
25. 2" Union	A N	A N	A N	A N	A N
26. 2" Union	A N	A N	A N	A N	A N
27. 2" Union	A N	A N	A N	A N	A N
28. Manway	A N	A N	A N	A N	A N
29. Manway**	A N	A N	A N	A N	A N
30. Coupling**	A N	A N	A N	A N	A N
31. Outlet**	A N	A N	A N	A N	A N
32. Vent**	A N	A N	A N	A N	A N
33. Pump Inlet**	A N	A N	A N	A N	A N
34. 2" Elbow	A N	A N	A N	A N	A N
35. 2" Union	A N	A N	A N	A N	A N
36. 2" Camlock	A N	A N	A N	A N	A N
37. 2" Coupling	A N	A N	A N	A N	A N
38. 2" Tee	A N	A N	A N	A N	A N
39. 2" Tee	A N	A N	A N	A N	A N
40. 2" Union	A N	A N	A N	A N	A N
41. 2" Pipe Nipple	A N	A N	A N	A N	A N
42. 2" Pipe Nipple	A N	A N	A N	A N	A N
43. 2" Union	A N	A N	A N	A N	A N
44. 2" Elbow	A N	A N	A N	A N	A N
45. 2" Elbow	A N	A N	A N	A N	A N
46. 2" Elbow	A N	A N	A N	A N	A N
47. 2" Elbow	A N	A N	A N	A N	A N
48. 2" Elbow	A N	A N	A N	A N	A N
49. 2" Elbow	A N	A N	A N	A N	A N
50. 2" Elbow	A N	A N	A N	A N	A N
51. 2" Union	A N	A N	A N	A N	A N
52. 2" Tee	A N	A N	A N	A N	A N

** These items are only inspected once a year due to their inaccessible location (on the top of the waste solvent tank).

IS MANDATORY THAT ANY LEAK OR POTENTIAL LEAK BE REPORTED TO YOUR SUPERVISOR IMMEDIATELY!

If "N", enter pump or valve #_____ and circle appropriate problem: 1. Potential leak, 2. Active Leak, 3. Sticking, 4. Wear, 5. Other_____

For all leaks and potential leaks, the Leak Detection and Repair Record must be completed!

Cameron-Cole LLC

Integrity Assessment
Used Solvent Storage System
Wheatland, Oklahoma

Prepared for:

Safety-Kleen Systems, Inc.

Date: 09.30.2009

Cameron-Cole, LLC

5777 Central Avenue
Suite 200
Boulder, CO 80301
P. 303.938.5500
F. 303.938.5520

www.cameron-cole.com

Cameron-Cole LLC

TANK SYSTEM CERTIFICATION

I have supervised the integrity assessment dated September 30, 2009, of the Used Solvent Storage Tank System at the Safety-Kleen Systems, Inc. facility in Wheatland, Oklahoma. The EPA ID Number for this facility is OKD 980878474. This work is described in the attached Cameron-Cole, LLC report *Integrity Assessment Used Solvent Storage System, Wheatland, Oklahoma*, September 30, 2009. The report was performed to meet the requirements of Resource Conservation and Recovery Act (RCRA) regulations in 40 CFR 264.191, 40 CFR 264.193, and the corresponding requirements in the Oklahoma Department of Environmental Quality regulations OAC 252:205-3-2.

With regard to the above duty, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assume that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of 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.

Wayne L. Frank
Registered Professional Engineer
Oklahoma PE Number 22414

Cameron-Cole, LLC
5777 Central Ave.
Suite 200
Boulder, CO 80301

CONCLUSIONS

The used solvent tank system at the Safety-Kleen Systems, Inc. facility in Wheatland, Oklahoma was inspected on September 8, 2009. External visual inspections were supplemented by hydrostatic leak test and by ultrasonic thickness measurements to evaluate the condition of the storage system.

System components including the drum washers, pump and associated piping and secondary containment areas are free from cracks, leaks, or significant corrosion or other performance-related defects. No leaks or cracks were observed in the hydrostatic operating testing of the used solvent tank or any of the system components.

Tank-thickness measurements indicate that the bottom and shell thickness are above the API 653 standards. Inspection and ultrasonic tank-thickness measurements should continue to be performed in accordance with EPA requirements of every five years.

APPENDIX F

SAFETY-KLEEN SYSTEMS INC

EMERGENCY INFORMATION

7528 NEWCASTLE ROAD

OKLAHOMA CITY, OK 73169

(405) 745 – 2025

FACILITY EMERGENCY COORDINATORS

Primary:

Kevin Stancil	2104 Whispering Creek Drive	(405) 420-4694
Branch General Manager	Edmond, Ok 73013	

Secondary:

Bruce Sharpton	1004 SW 98th	(405) 308-1700
Customer Service Manager	Oklahoma City, OK 73139	(405) 761-3467

FACILITY NOTIFICATION NUMBERS

Internal

Safety-Kleen Incident 24 Hour Notification System	24 Hour	(800) 468-1760

External:

National Response Center	24- Hour	(800) 424-8802
Oklahoma Department of Environmental Quality	24- Hour	(800) 522-0206
Qualified Emergency Responder	24- Hour	(800) 468-1760

OKLAHOMA CITY, OK EMERGENCY TEAMS

Oklahoma City Police Department	911
Oklahoma City Fire Department	911
Integris Health Baptist Medical Center	911 or (405) 949-3161

Revised: 11/10/21

EMPLOYEE FUNCTIONS DURING AN EMERGENCY

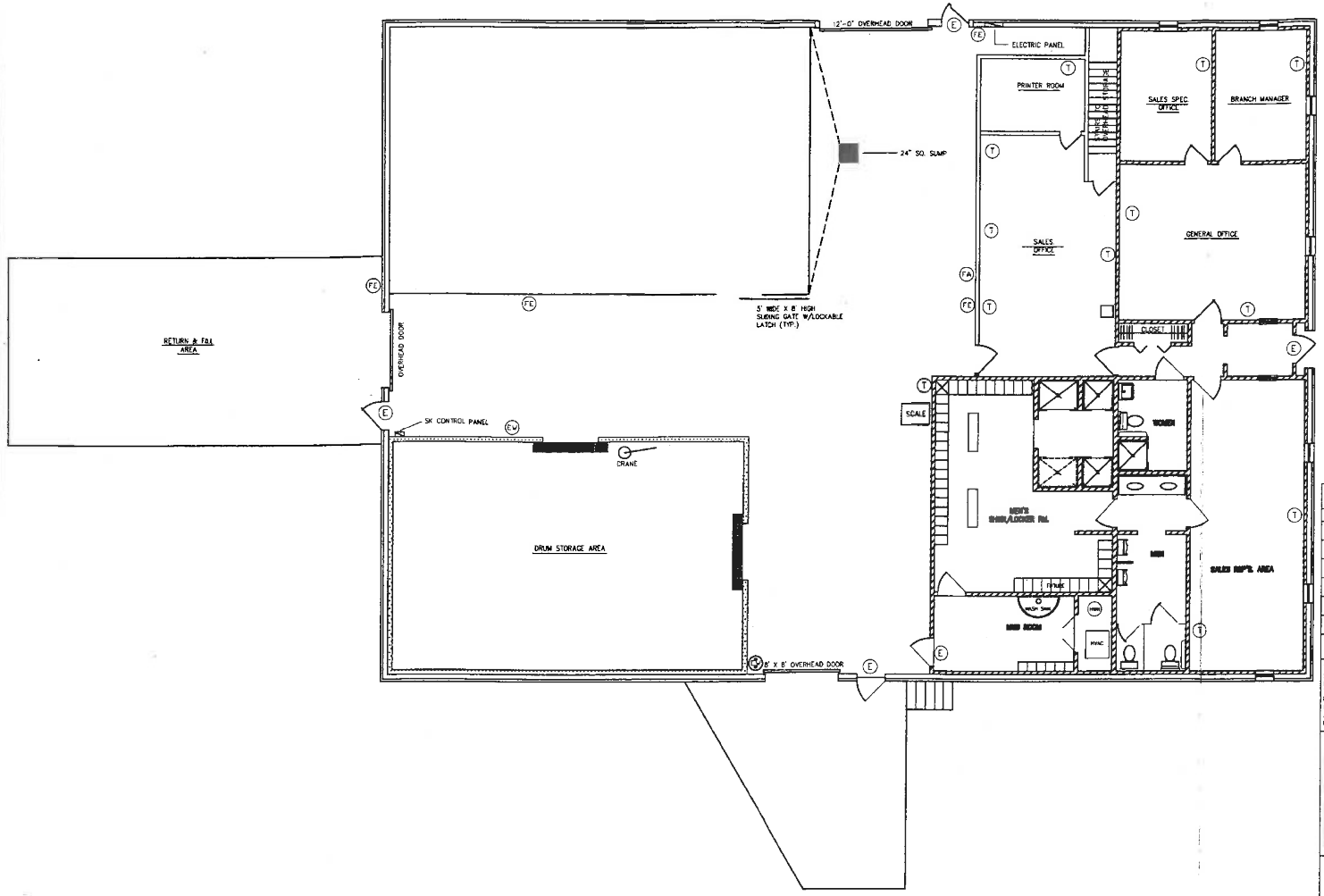
EMPLOYEE	EMERGENCY FUNCTION
Branch Manager (Primary Emergency Coordinator)	Supervise all emergency actions Notify emergency agencies (if necessary) Administer first aid Issue evacuation order
Middle Management (Alternate Emergency Coordinator)	Supervise evacuation and emergency response actions
Sales Personnel	Retain, contain or slow the flow of released materials. Assist as needed
Service Personnel	Retain, contain or slow the flow of released materials. Assist as needed
Material Handler	Retain, contain or slow the flow of released materials. Shut off electricity
Administrative Staff	Assist as directed by emergency coordinator Make sure visitor log is taken out of facility if evacuated

Incident

Form Code: 7

Incident Header	
Incident Number	
Incident Date	
Description of Incident	
Incident Time	
Incident Location	
Severity	
Incident Categories	
Incident State/Province	
Incident Owner Branch	
Reported By Employee ID	
Incident Owner Employee ID	
Did you verbally notify your supervisor of this incident?	
Incident Footer	
Incident Owners should ensure the following	
1. Has the Incident Owner made the proper internal and/or external notifications of the Incident to applicable levels of management, Health & Safety, Compliance, Trans Compliance.	
2. Has the Incident Owner uploaded all the relevant information and evidence such as pictures, written statements, emails and medical note/visits (Please note to redact employee's information like SSN# and personal address from any document).	
3. Has the Incident Owner determine the applicable incident classification and severity level(s) as per Company's Severity Index.	
4. Has the Incident Owner investigated the incident and perform the casual analysis, completing the Management Team Investigation (MTI) section.	
5. Has the Incident Owner established the effective measures including the assignment of work tickets for corrective action in IMS.	
Document Upload	
Images	

Signature	



FLOOR PLAN

SCALE: 3/16" = 1'-0"

LEGEND:

- (E) - EXIT
- (EW) - EYEWASH
- (T) - TELEPHONE
- (FE) - FIRE EXTINGUISHER (TYPICAL 10# ABC)
- (PS) - PULL STATION
- (SK) - SPILL KIT
- (FA) - FIRST AID STATION

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
0	NEW ISSUE FOR REVIEW	JEK	BDP	BDP	072808

PROPRIETARY STATEMENT

Project Solutions Companies
1300 Rhone Industrial Drive • Suite 200 • Columbia • MO 65202
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

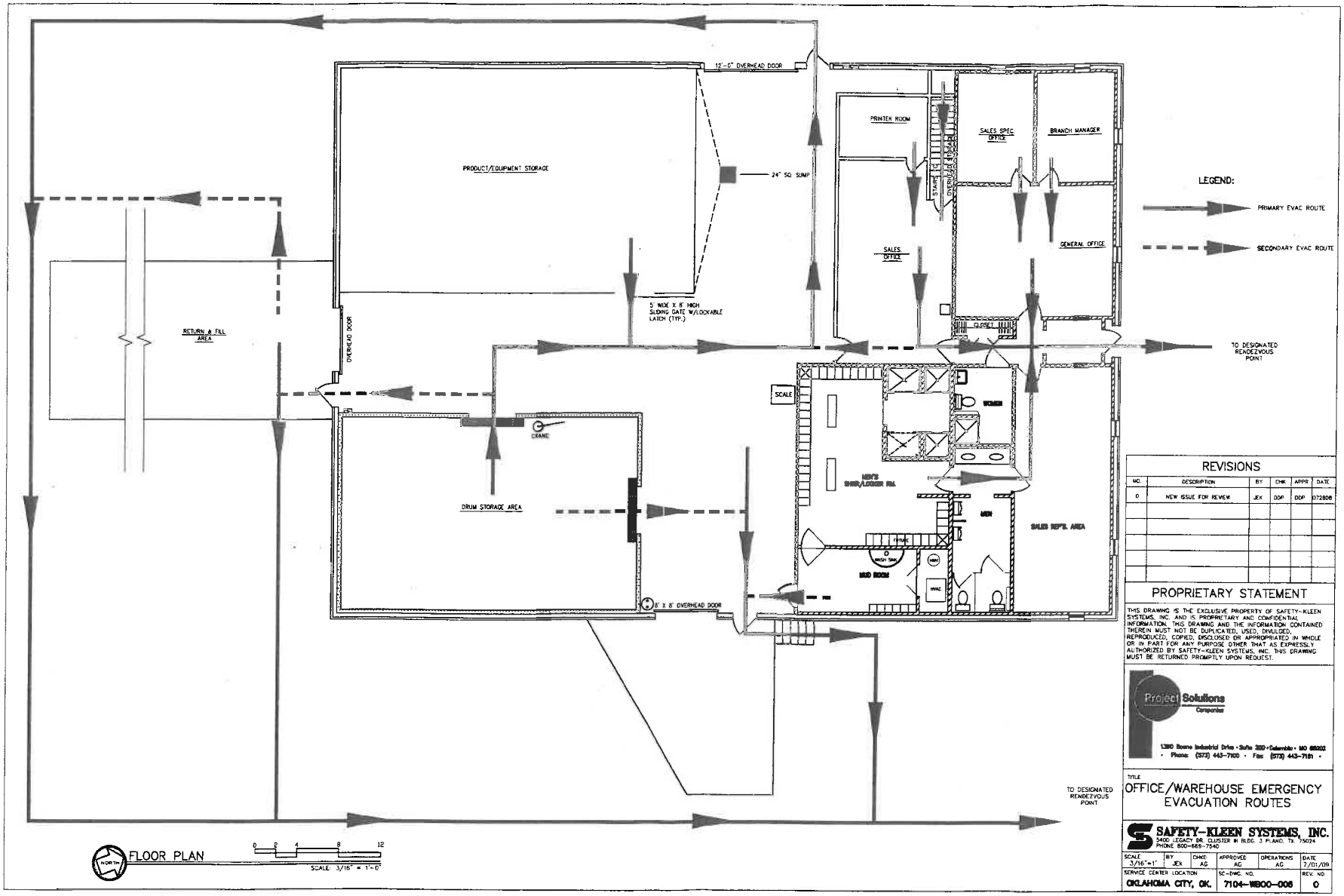
TITLE

WAREHOUSE EMERGENCY EQUIPMENT LOCATIONS

SAFETY-KLEEN SYSTEMS, INC.
5400 LEGACY DR. CLUSTER III BLDG. 3 PLANO, TX. 75024
PHONE 800-669-7540

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
3/16"=1'	JEK	AG	AG	AG	7/01/09

SERVICE CENTER LOCATION	SC-DWG. NO.	REV. NO.
OKLAHOMA CITY, OK.	7104-WB00-005	0



REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
0	NEW ISSUE FOR REVIEW	JEK	DDP	DDP	072808

PROPRIETARY STATEMENT

Project Solutions Companies
1380 Boone Industrial Drive • Suite 200 • Columbia • MO 65202
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

TITLE
OFFICE/WAREHOUSE EMERGENCY EVACUATION ROUTES

SAFETY-KLEEN SYSTEMS, INC.
5400 LEGACY DR. CLUSTER III BLDG. 3 PLANO, TX. 75024
PHONE 800-669-7540

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
3/16"=1'	JEK	AG	AG	AG	7/01/09

SERVICE CENTER LOCATION	SC-DWG. NO.	REV. NO
OKLAHOMA CITY, OK.	7104-WB00-006	0

LEAK DETECTION AND REPAIR RECORD

EQUIPMENT I.D.# _____ BRANCH #_____

DESCRIPTION_____

	DATE	INSPECTOR'S SIGNATURE
HOW WAS POTENTIAL OR ACTUAL LEAK DETECTED?_____	_____	_____
DESCRIBE THE POTENTIAL OR ACTUAL LEAK:_____ _____		
INSTRUMENT MONITORING WITHIN FIVE DAYS	_____	_____
(1.) RESULTS_____		
REPAIR ATTEMPT METHOD_____	_____	_____
(2.) RESULTS_____		
REPAIR ATTEMPT METHOD_____	_____	_____
(3.) RESULTS_____		
DATE OF SUCCESSFUL REPAIR (must be completed w/in 15 days)	_____	_____
METHOD_____		
(4.) RESULTS_____		
FOLLOWUP MONTHLY MONITORING FOR VALVES		
(5.) RESULTS_____	_____	_____
(6.) RESULTS_____	_____	_____

MONITORING SUMMARY

	(REFERENCE NUMBER - SEE ABOVE)					
	(1)	(2)	(3)	(4)	(5)	(6)
INSTRUMENT #/OPERATOR	___	___	___	___	___	___
CALIBRATION	___	___	___	___	___	___
BACKGROUND READING	___	___	___	___	___	___
READING AT EQUIPMENT	___	___	___	___	___	___
LEAK DETECTED?	___	___	___	___	___	___

ATTACH ANY DOCUMENTATION PREPARED BY THE CONSULTANT

Equipment	Location	Description	Capabilities
Gloves	Warehouse	Neoprene, Latex & Leather	Provide hand protection from cuts, splashes and exposure to contaminants
Safety Glasses	Warehouse	Glasses, goggles, face masks	Eye and splash protection
Aprons	Warehouse	Front coverage aprons	Prevent splashes to clothing
Eyewash/Shower Combo Eyewash	Areas with potential contamination to eyes (warehouse, return and fill, first aid kits)	Hard plumbed unit Portable unit Bottled eye wash	Purges contaminants from eyes and body
Fire Extinguisher	Office areas, warehouses, return and fill, flam shed, tank farm, FRS shed, all trucks	10 & 20 lb units	ABC rated for wood, paper, electrical and solvent fires.
Absorbent & Spill Dry Material	Warehouse, tank farm, route trucks	Booms, pads, granular absorbent, vermiculite	Capable of absorbing liquid spills of aqueous & petroleum type spills
Respirators	Issued to individual employees	Half face or full face	Protection from exposure to organic solvents, acids gases and ammonia
Telephones	Warehouse and office	Standard office phone & company-supplied cell phones	Allows employees to summon outside assistance in case of emergency
Emergency Alarm	Return and Fill	Red push button alarm on dock	Alarm emits a loud siren, audible to surrounding area and inside office, to notify of a problem in the return and fill.
Brooms, Buckets, Mops, Portable Pump and Wet/Dry Vacuum	Warehouse		Used to contain and pick-up spills.
First Aid Kits	Warehouse All trucks		Provide medical care for minor injuries

APPENDIX G

Exhibit G-1 Example Job Descriptions

Exhibit G-2 Example Regulatory Training Requirements Matrix

Exhibit G-3 Example Training Records Form

Safety Kleen Systems Inc.

Job Description

Job Title: Branch Administrator
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVPHR
Approved Date: 03/26/07

Summary: The Branch Administrator is an administrative position responsible for maintaining detailed and accurate company, branch, and customer files.

Essential Duties and Responsibilities include but are not limited to the following.

- Assembles packages of documents for Sales Representatives.
- Check Sales or Hazardous Waste documents turned in by Sales Representatives.
- Ensure proper completion of paperwork including manifests, and alert manager of errors.
- Provide customer service functions by responding to customer inquiries and/or complaints, handling or routing service questions, and solving problem accounts.
- Prepare Manual Forms, Manifests and LDR forms, as required.
- Distribute copies of service documents and manifests to customers, various Safety-Kleen locations, and to governmental agencies, as required.
- Contact customers delinquent in payment and coordinates pick-up of payments.
- Log wastes, adjusts service scheduling, prepares reports, completes MMVR reports and checks manifests for assigned territories.
- Provide other clerical support duties as requested.

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/or Experience: High school **diploma** and six months+ related experience, and/or training.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of Safety, Time Management, Product **Knowledge,** Sense of Direction, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently sit at a work station using the computer.

Safety Kleen Systems Inc.

Job Description

Job Title: **Branch General Manager**
Department: Branch Sales & **Service**
Reports To: District Manager
FLSA Status: Exempt
Approved By: SVPHR
Approved Date: 01129/07

Summary: The Branch General Manager is responsible for financial and operational management including: financial performance **against** quota or budget (P & L), EH&S compliance through the Environmental Management System (EMS), and operational management of the facilities and of the human resources.

Essential Duties and Responsibilities include but are not limited to the following.

- Manage the branch operations including hiring, training, and supervision of the staff.
- Manage sales and service staff in achieving customer retention, on-time service performance, and accounts receivable goals by: observing corporate operating guidelines, training and reinforcing critical service skills, and working to prevent and resolve customer service issues.
- Conduct inspections and ride-along with sales and service staff to ensure timely and effective servicing of customers' equipment.
- Profit or loss of the facilities) by focusing on building new business relationships and maintaining existing customer bases and satisfaction.
- Prepare branch **sales/service** forecast and budget.
  Ensure compliance with all applicable environmental. health, and safety (EHS) requirements by working with corporate EHS resources to keep an training and record keeping up to date, and by monitoring day operations to assure performance is within regulatory guidelines.
- Maintenance of branch fleet to company standards, assistance **with branch** incident alert and spill response systems, and control of branch inventory.
- Maximize collection of money at the time of service, connect on overdue accounts, and determine when *to* pull an account.
- Ensure that all branch customer service practices are conducted consistent with high ethical standards.

Supervisory Responsibility:
The Branch General Manager recommends hiring, training, scheduling, performance appraisal, promoting, compensation, corrective action and termination.

Qualifications: To perform this job successfully, an individual must be able *to* perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable Individuals with disabilities to perform the essential functions.

Education and/or Experience: Minimum of High School diploma or (GED). Bachelor's degree preferred. At least 5 years experience in a sales and service organization.

Certificate&, Licenses, Registrations: Class B CDL, Haz Mat, Air Brakes and Tankers endorsement.

Physical Demands: While performing the duties of this job, the employee must frequently sit for long periods of time, use the computer, as well as occasionally lift up to 25 pounds. There will also be some occasional need for bending, kneeling, or reaching.

Work Environment: While performing the duties of this job, the employee has some exposure to warehouse as well as outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; extreme cold; extreme heat

Safety Kleen Systems Inc.

Job Description

Job Title:	Customer Service Manager
Department	Branch Services
Reports To:	Branch General Manager
FLSA status:	Exempt
Approved By:	SVPHR
Approved Date:	01/29/07

Summary: The Customer Service Manager is responsible for ensuring optimum customer service leading to retention and expansion of the branch business. Key responsibilities include supervising customer service staff, ensuring services are completed in a timely manner, and managing customer relationships.

Essential Duties and Responsibilities include but are not limited to the following.

- Manage the branch customer service functions Including hiring, training and supervision of the sales and service representatives (SSR).
- Manage sales and service staff in achieving customer retention, on-time **service** performance, and accounts receivable goals by: observing corporate operating guidelines, training and reinforcing critical service skills, and working to prevent and resolve customer service issues.
- Conduct Inspections and ride-slangs with sales and service staff to ensure timely and effective servicing of customer;' equipment.
- Direct branch service scheduling and logistics to ensure on-time performance for all customers by aligning territories, defining routes, and managing **Associated paperwork.**
- Ensure SSR compliance with all applicable environmental, health, and safety (EHS) requirements by working with corporate EHS resources to keep all training and record keeping up to date, and by monitoring daily operations to assure performance is within regulatory guidelines.
- Work with Branch General Manager (BGM) to ensure effective operation of the branch including maintenance and operation of branch fleet to company s1andards, assistance with branch incident alert and spill response systems, and control of branch inventory.
- Administer branch accounts receivable program to maximize collection of money at the time of service, collect on overdue accounts, and determine when to pull an account.
- Ensure that all branch customer service practices are conducted consistent with high ethical standards.

Supervisory Responsibility:
The Customer Service Manager recommends hiring, training, scheduling, performance appraisal, promoting, compensation, and termination.

Qualifications: To perform this job successfully, an Individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability requi111d.

Education and/or Experience: High school diploma or {GED). 3-5 years' experience and/or related training.

Certificates, Licenses, Registrations: Class B COL, Haz Mat. Air Brakes and Tankers endorsement.

Physical Demands: While performing the duties of this Job, the employee must frequently stand, walk, bend, use the computer, reach, squat, stoop and twist. The employee must frequently C8JT}', lift, pull or push up to 50 pounds. The employee will occasionally drive a large truck.

Work Environment: While performing the duties of this job, the employee is frequently exposed to warehouse and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; extreme cold; extreme heat.

Safefl-Kleen Systems, Inc.

Job Description

Job Title: **OIL/VAC Sales and Service Rep.**
Department: Branch Sales & Service
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVPHR
Approved Date: 10/2/06

Summary: This position combines the Oil & Vac routes and depending on the service will require the employee to remove waste fluid our customers (VSSR Route). This involves using vacuum equipment to pump waste materials and liquid from oil-water separator pits, as well as transporting & delivering the waste material to Safety-Kleen disposal sites. Or it will require the employee to remove, transport and deliver waste oil from customer facilities to Safety-Kleen oil recycling and refining centers (Oil Route). Reports to CSM or BGM.

Essential Duties and Responsibilities include the following. Other duties may be assigned.

- Receive manifests, labels & route schedule from office staff
- Perform Pre & Post Trip Inspection Report
- Perform route: (drive to customer location, ensure each service meets the used oil or vac waste qualifications, take sample of each off or vac service & place in retain sample storage area, pump waste oil or waste materials & liquid from oil-water separator pits from customer facilities to Safety--Kleen oil recycling & refining centers or Safety-Kleen disposal site).
- Property label, scan and document waste oil (oil service) or waste materials & liquids (vac service) removed from customer site into handheld. Present receipt to customer, obtain authorized signature, as well as answer any customer service issues.
- Complete end of day paperwork (any manifests, orders etc. that were not already In the handheld). Dock handheld for overnight upload.
- Ensure environmental compliance and operate vehicles in accordance with DOT, local, state and federal requirements

Sales Responsibilities:
Focus is all customer types within a particular **region or** territory for new **and existing accounts.**

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Education and/or Experience: High school diploma or (GEO}. No experience necessary.

Certificates, Licenses, Registrations: CDL and Haz Mat endorsement and Tanker.

Competencies and Skills: Customer Service, Attention *to* Detail, Recognize the importance of, and adherence to, Safety regulations and policies, time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Waste, and Organization skiffs.

Physical Demands: While performing the duties of this job, the employee must frequently kneel and stoop and constantly bend, climb, reach and twist. The employee must constantly carry, lift and pull up to 50 pounds. The employee must constantly drive a large truck and occasionally move equipment. Job will use right and left hands for repetitive movement such as Simple Grasping and Pushing/Pulling. Job will use right hand for repetitive movement such as Fine Manipulation. Job will use feet for repetitive movement such as foot controls.

)

Work Environment While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and riskof electrical shock.

Safety Kleen Systems Inc.

Job Description

Job Title: **MSS**
Department: Sales
Reports To: District Sales Manager
FLSA Status: Exempt
Approved By: SVPHR
Approved Date: 01/29/07

Summary: The MSS will continually manage an account base outside of the ordinary service schedule. This position will also grow business Internally and externally. The MSS will act as the primary point of contact for customers with questions / concerns / new business. This should be a motivated person who possesses consultative selling abilities and who is skilled at building long-term business relationships within the assigned sales territory.

Essential Duties and Responsibilities include but are not limited to the following.

- Completion of necessary **paperwork** (Waste profiling, quotations etc).
- Communication with service, office, and warehouse staff.
- Build relationships with key buyers in territory.
- **Assess** current/potential **business** In existing accounts and create strategy to grow business.
- Analyze customer needs **and design sales,** customer service and account management processes to acquire and retain accounts.
- Prepare and deliver customer quotes and identify new solutions for customers
- Provide technical and sales assistance to customers.
- Serve as interface between customers and company by ensuring that customer needs are met and by handling customer complaints.
- Prepare sales plans and Mure period forecast's.
- Monitor and track sales plan to ensure sales quota is met; prepare regular status reports.
- Keep abreast of products, market conditions and competitive activities.

Qualifications: To perform this job successfully, an individual must **be able** to perform each essential duty Safety Kleen Systems Inc. satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required.

Education and/or Experience: Two years of college or specialized training (business or environmental) is required plus 1--3 years experience. Bachelor's degree plus coursework and certification is preferred. Alternative combinations of education and experience may be accepted in lieu of degree.

Competencies and Skills: Analytical, prioritization, organization, computer and leadership skills. Must be proficient working with spreadsheets as well as CRM software tools.

Physical Demands: While performing the duties of this job, the employee must frequently drive a car.

Safety Kleen Systems Inc.

Job Description

Job Title: **Material** Handler
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVPHR
Approved Date: 03/26/07

Summary: The Material Handler works in the warehouse handling hazardous waste material using a forklift or other equipment.

Essential Duties and Responsibilities include but are not limited to the following.

- Loads finished product bulk shipments, and completes Paperwork.
- Samples inbound bulk shipments and completes paperwork.
- Inventory and maintain loading and unloading areas.
- Prepares bulk wastes for shipment to other Safety-Kleen locations.
- Empties bulk into holding vessel.
- Washes "RCRA Empty" drums in drum washer and fills clean drums with solvent.
- Shrink wraps containerized wastes, arranging the waste on the pallet so all labels are showing, end prepares the shipment for transportation to other Safety-Kleen locations.
- Checks all trucks for proper strapping of drums and that cargo doors are closed.
- Disassembles returned parts washing machines and prepares them for shipment to the DC.
- Completes dally/weekly facility inspection required by Part B Permit or by Safety Kleen , as assigned by the Branch Manager.
- Monitors waste quantity and storage limits and notifies the Branch Manager if limits will be exceeded within 24-48 hours so action can be taken.
- Oversees retained sample program.
- Ensure dock, warehouse and return & fill areas are cleaned and organized at all times.

Qualifications: To perform this job successfully, an individual must be able.to perform each essential duty satisfactorily. The requirement & listed below are representative of the knowledge, skill, and/or ability required.

Education and/or Experience: High school diploma and six months+ related experience, and/or training. Familiar with H.S.E. and M.S.0.S. for an product used and stored at the facility. Certified fof1dlft operator. Certified in hazardous waste operations and emergency response.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of Safety, Time Management, Product Knowledge, Sense of Direction, and Organization skills.

Physical Demands: Exert up to 50 pounds of force occasionally, and/or up to 20 pounds of force frequently, and/or up to 10 pounds of force constantly to move objects. Stands and/or walks more than 4 hours a day. Hand Tools & Small Power Tools; Hand Truck/Dolly; large Power Tools & Equipment, Forklift, Truck, Wench; Personal Protective Equipment.

Safety-Kleen Systems, Inc.

Job Description

Job **Title:**	Sales and Service **Representative**
Department:	Branch Services
Reports To:	Branch Service Manager
FLSA Status:	Exempt
Approved By:	SVPHR
Approved Date:	01/29/07

Summary: Services SK machines at customer sites, sells new products to existing customers, removes waste from customer sites and provides on-site customer service.

Essential Duties **and Responsibilities** include but are not limited to the following.

- Receive manifests, labels, route schedule from office staff.
- Select, pull, and **load needed** inventory (empty drums, pig products, new machines, etc) *pet* route schedule.
- Perform daily truck check & complete truck check list form.
- Perform routine route
- Properly label, scan, and document waste picked up from customer site.
- Present receipt to customer as well as address any customer service issues or sales opportunities.
- Complete end *of* day paperwork.

Qualifications: To perform this job successfully, an individual must **be able** to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skiff, and/or ability required.

Education and/or Experience: High school diploma or (GED) and six months+ related experience, and/or training.

Certificates, Licenses, Registrations: Class C CDL and hazmat certification.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of Safety, Time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Waste, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently sit, walk, stand. crawl or drive a truck. The employee must frequently carry, lift, pull or push 50 pounds or more. The employee is constantly required to reach, bend, kneel, squat, climb, stoop or twist; and talk *or* hear. The employee must constantly drive a large truck and/or move heavy equipment.

Work Environment: While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. Toe employee is *occasionally* exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and risk of electrical shock.

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Safety Kleen Systems, Inc.

Job Description

Job Tide: Oil Sales and Service Representative
Department: Branch Services
Reports To: Branch General Manager
FLSA Status: Exempt/Non-Exempt
Approved By: SVP HR
Approved Date: 01/29/07

Summary: The OSSR is responsible for safely and efficiently removing, transporting and delivering waste oil from customer facilities to Safety-Kleen oil recycling and refining centers.

Essential Duties and Responsibilities include but are not limited to the following.

- Receive manifests, labels & route schedule from office staff
- Perform Pre & Post Trip Inspection Report
- Perform routine route.
- Property label, scan and document waste oil removed from customer site into handheld. Present receipt to customer, obtain authorized signature, as well as **address any** cU8tomer service issues and sales opportunities.
- Complete end of day paperwork (any manifests, orders etc. that were not already in the handheld). Dock handheld for overnight **upload.**
- Ensure environmental compliance and operate vehicles In accordance with DOT, local, state and federal requirements

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the **knowledge,** skill, and/or ability required.

Education and/or Experience: High school diploma or (GED) and six months+ related experience, and/or training.

Certificates, Licenses, Registrations: Class C CDL and Haz Mat endorsement and Tanker.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of, and adherence to, Safety regulations and policies, Time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Wasta, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently sit, walk, stand, crawl, or drive a truck with reasonable accommodations. The employee must frequently carry, lift, pun or push 50 pounds or more. The employee is constantly required to reach, bend, kneel, squat, climb stoop or twist; and talk or hear. The employee must constantly drive a large truck.

Work Environment: While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and risk of electrical shock.

Safety-Kleen Training Matrix

SK Course Code	Course Description	When	Facility Mgr	Service Rep	Admin Support	Material Handler	Sales Support
HS-101	24-Hour Hazwoper	Initial	✓	✓		✓	✓
HS-104	8-Hour Hazwoper Refresher	Annual	✓	✓		✓	✓
HS-107	Controlled Substance Abuse Training	Initial	✓	✓	✓	✓	✓
HMTS	Hazardous Materials Transportation Skills	Initial Triennial	✓	✓	✓	✓	✓
ET-176	Driver Safety Training	Initial Triennial	✓	✓			✓
ET-237	Drum Inspection and Closure	Initial Triennial	✓	✓		✓	✓
ET-140	RCRA Update	Annual	✓	✓	✓	✓	✓
HS-106	Health & Safety for Admin	Initial Triennial			✓		
ET-144	Completing the Material Profile	Initial					✓
OB_430002	Spill Response Procedure	Initial	✓	✓		✓	✓
OB_210002	Req for Generators: EPA ID # & Manifests	Initial	✓	✓	✓	✓	✓
OB_210008	Completing the Uniform Hazwaste Manifest	Initial	✓	✓	✓	✓	✓

SAFETY-KLEEN SYSTEMS
TRAINING ATTENDANCE /CERTIFICATION SHEET

Date :._____ Location_____

Course Name:_____ Event Number:_____

Course Code_____ Time:_____to_____ Duration_____

	PRINTED NAME	SIGNATURE	EMPLOYEE#	FACILITY (CITY, STATE)
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
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24.				
25 .				

The above *Listed employees have satisfactorily d* associated *tests and, demonstrated satisfactory performance and comprehension of this course.*

Trainer; _____ Trainer Signature _____ Trainer Location: _____
Please print

SAFETY-KLEEN SYSTEMS, INC.
OKLAHOMA CITY, OKLAHOMA

PERMIT ATTACHMENT 1

FACILITY DESCRIPTION

NOTES:

1. ALL THE PAGES FOR THE ATTACHMENTS ARE TAKEN FROM THE PERMIT APPLICATION AND PAGE NUMBERS MAY NOT BE IN SEQUENCE.

2. THE TABLES, FIGURES, ATTACHMENTS, APPENDICES AND OTHER REFERENCES MENTIONED IN THESE ATTACHMENTS, ARE TAKEN FROM THE PERMIT APPLICATION.

FACILITY DESCRIPTION

ABSTRACT

Corporate Headquarters:	Safety-Kleen Systems, Inc. 42 Longwater Dr. Norwell MA 02061
Responsible Official:	Kevin Stancil Branch Manager
Facility Address:	Safety-Kleen Systems, Inc. 7528 Newcastle Road Oklahoma City, OK 73169
Telephone Number:	405-208-3086
U.S. EPA Identification Number:	OKO 980 878 474
Geographic Location:	35° 24' 12" N 97° 38' 57• **W** Oklahoma County
Landowners:	Deer Trail Limited Partnership #3 1921 Clear Creek Drive Weatherford, TX 76087
Date Operations Began:	July 1, 1985
Description of Activities:	This facility **is a** collection point for many spent materials generated *by* Safety-Kleen customers, the majority of whom are small quantity generators. AU wastes are ultimately transported to a Safety-Kleen recycling facility or other properly permitted facility for processing.
Property Description:	Approximately 2.9 acres with the following structures: a. One building with offices and a warehouse for container storage;

b. One tank farm with three aboveground storage tanks (one contains spent parts washer solvent, two contain product parts **washer** solvent)
c. A metal shelter used for container storage
d. One loading dock with a return and fill station

Facility **Type:** Storage in an **above** ground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (gallons)	SECONDARY CONTAINMENT (gallons)	MATERIAL TO BE STORED
Drum Washer/Dumpster Unit	**750**	**2,992**	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) [1] Spent Aqueous Brake Cleaning Solution (D039} [1]
Container Storage Area (Warehouse)	**1728**	**185**	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) [1] Spent Aqueous Brake Cleaning Solution (D039) [1] Drum Washer/ Dumpster Sediment (D001) [1] Spent Immersion Cleaner (D006) [1] Dry Cleaning Waste (D001·or F002) [3] Paint Waste (D001, F003, F005) [4] Photographic Imaging Waste (D011) [1] Contaminated Debris (F002, F003, F005) [5] Transfer Wastes [2]

Container Storage Area (Metal Shelter)	2,184	1,122	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (0001) [1] Spent Aqueous Brake Cleaning Solution (D039) Drum Washer/ Dumpster Sediment (D001) [1] Spent Immersion Cleaner (D006) [1] Dry Cleaning Waste {D001 or F002} [3] Paint Waste {D001, F003, F005) [4] Photographic Imaging Waste {D011) [1] Contaminated Debris (F002, F003, F005) [6] Transfer Wastes [2]
Tank	16,800	32,672	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) [1] Spent Aqueous Brake Cleaning Solution (D001) [1]

1 In addition to the code{s) listed above, these waste codes may be applicable: D004,D005,O006,D007, DO0B,D0 09, D010,D011,D018,D019,D021, D022, D0 23,DD24,D025,O026,D027,D028,D029, D030,D032,D033,D034,D035,D036,D037,D038, D039, D040,0041,D042,D043

2 Any of the following waste codes may be applicable:

D001, D002, D003,D004,D005, D006,D007,D008,D009,D010,D011,D012,D013,D)14,0015,D016,D017,D018, D019, D020,D021, D022,D023 ,D024 ,D025, D026,D027, D028,D029,D030, D031,D032,D033, D034,D035, D036,D037,D038, D039,D040,D041,D042, D043

F001, F002, F003, F004, F050, FOOS, F007,F008, F009, F010, F011, F012,F019, F024,F025, F032,F033,F034,F035, F037,F03B, F039

K001, K002, K003, K004,KOOS, K006, K007, KOOB, K009, K010, K011, K013, K014, K015,K016, KOH,K018, K019, K020, K021, K022, K023, K024, K025, K026, K02,7K02,8K029, K030, K031,K03,2K033, K034,K 035, K036,K03,7K038,K039, K040, K041, K042, K043,K046,K048, K04,9K050, K051,K05,2K060,K061, K062,K064, K06,5K066,K068, K071,K07,3 K083, KOB4, KOBS, KOBS, K0B7, KOBS, K09,0K091, K093, K094, K095, K096, K097, K098,K099, K100, K101, K102,K103, K104, K10S, K106, K107, K108, K109 , K110, K111, K112 , K113, K114, K11S, K116, K117, K118, K123, K124, K125, K126, K131, K132, K136, K140, K141 , K142, K143, K144, K145, K147, K148, K149, K150, K151,K1S6, K157, K158, K159, K160 , K169, K170,K171,K172,K174, K175, K 176, K177,K178

P001, P002,P003,P004, P005, P007,P008, P010,P011 ,P012,P013,P014, P015,P016,P017, P018,P020,P021,P022, P023, P024,P026,F027,P028, P029,P030,P031, P033,P034, P036, P037, P038,P039,P040, P041, P042, P043, P044, P045, P046,P047,P048, P049, P050, P051,P054, P056, P057,P058,P059,P060,P062,P063, P064,P065, P066, P067,

P068,P069, P070,P071,P072,P073, P074, P075, P076, P077,P078, P081, P082, P08,4P 085,P087, POSS, P089,P092, P093, P094, P095, P096, P097, P098, PD99, P101, P1D2, P103, P104, P105, P106, P108, P109, P110, P111. P112, P113, P 114, P115, P116, P118,P119,P120, P121, P 123, P127, P128,P185, P188,P189,P190,P191, P192, P194, P196,P197, P198, P199, P201, P202, P203, P204, P205.

U001, U002, U003, U004, U005, U007, UODB, U009, U010, U011, U012, U014, U015, U016, UD17, U018, U019, U021, U022, U02,4U025,U026, U027, U02,8U029, U030, U031, U032, U034, U035, U036,U037, U038, U039, U041, U04,2U043, U044, U045, U046, U047, U048, U049, U050, U051, U052, U053, U055, U056,U05,7U058, U059, U060, U061, U062, U063,U064,U066, U067, U068, U069, U070, U071, U072, U073, U074, U075, U076, U077, U078, U079, U080. U081, U082, UOB3, U084,

U085,U086, U087, U088, U089, U090, U091, U092, U093, U004, U095, U097, U09,8UD99, U101, U102, U103, U105, U106, U107 , U108, U109, U110, U111 , U112, U113, U114, U115, U116, U117, U118, U119, U120, U121,U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U134, U135, U136, U137, U138, U140, U141 , U142, U143, U144, U145, U146, U147, U148, U149, U150, U151, U152, U153, U154, U155, U156, U157, U158, U159, U161, U162, U163, U164, U165, U166, U167, U168, U169, U170, U171 , U172, U173, U174, U176,U177,U178,U179,U180, U181, U182, U183,U 184, U185, U186, U187, U188, U190,U191, U192,U193, U194, U196, U197, U200,U201, U202, U203,U204, U206,U207,U208,U209,U210, U211,U213, U214,U215,U216,U217, U218, U219, U220,U221, U222, U225, U226,U 227, U228,U235,U236,U237,U238, U239, U240, U243, U244, U246, U247,U248, U249, U271, U277,U278, U279,U280,U328, U353, U35,9U364, U365, U366, U367,U372, U373, U375, U376, U377, U378, U379, U381, U382, U383, U384, U365, U386, U367,U389, U390, U391, U392, U393, U394, U395,U396,U400,U401, U402, U403, U404,U407,U408,U410,U411

3 In addition to the code(s) listed above, these waste codes may be applicable: D004, D005, 0006, 0007, D008,0009, D010, D011, 0018, D019,0021, D022, 0023,0024, D025,002,60027, D028, D029, D030,D032, D033,D034,0035,D036, D037, D036, D039, D040,D041, D042,D043

4 In addition to the code(s) fisted above, these waste codes may be applicable: D004,0005, D006, D007,0008,0009, D010,D011, D018, D019, D021, D022, D023,0024, D025, D026, D027,0028, D029, D030,D032,D033,D034,D035,D036,D037, D038, D039,D040,0041,D042,D043

5 In addition to the code(s) listed above, these codes may be applicable: D001,D004, D005, D006, D007, D008,D009,D010, D011,D018,D019, 0021, D022, D023,D024,D025,D026,D027,D026,0029,D030, D032,D033,D034, D035, D036,D037,D038, D039,D040,D041, D042, 0043

1.0 FACILITY DESCRIPTION {40 CFR 270.14(b)(1)]

1.1 DESCRIPTION OF BUSINESS ACTNITY

Safety-Kleen Systems, Inc. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance, and dry cleaning services. The company has been operating since 1968, offering solvent collection and reclamation services for its 500,000 customers, most of whom generate less than 1000 kilograms (2,200 pounds) of hazardous waste per month. In 2007, Safety-Kleen reclaimed more than 200 million gallons of used oil, and over 14 million gallons of used parts washer solvent. Safety-Kleen is also a leading provider of containerized waste services, vacuum services, total project management and other environmental services to a wide array of customers in the automotive, metalworking, manufacturing, and other end markets.

The Oklahoma City Service Center typically operates Monday through Friday, from 6 a.m. to approximately 6 p.m. The Branch General Manager has the ultimate responsibility of the facility's operations. In the event of his/her absence, a qualified designate will assume the responsibility.

Currently, *the* Oklahoma City Service Center offers several services that involve the accumulation, transfer and storage of spent materials. These materials are transported from the Service Center to one of the Safety-Kleen recycle centers or an independent reclaimer. A description of each of these services follows:

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service, which remains the primary business activity. This service involves the leasing of degreasing units, which consist of a reservoir and a degreasing area. The reservoir contains a degreaser such as petroleum naphtha solvent, immersion cleaner solvent, or aqueous cleaner. On a regularly scheduled basis, a Safety-Kleen representative cleans and inspects the parts cleaner unit and replaces the reservoir of spent material with clean (most often recycled) product

The Safety-Kleen representative then transports the parts cleaning solution back *to* the Oklahoma City Service Center. The spent petroleum naphtha solvent is transferred from the containers to storage tanks and containers of product are prepared for the next day's services. Used cleaning solutions may also be transferred to the facility's container storage areas. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect

the spent solvent at the Service Center. Approximately two-thirds of the solvent used by Safety-Kleen customers is reclaimed with the remainder being purchased from a vendor.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service (COMS), provides a material reclamation service to these customers regardless of machine model.

A second type of parts cleaner, the immersion cleaner machine, removes varnish and gum from such equipment as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container containing a non-halogenated hydrocarbon mixture. The spent material remains in the container after delivery to the Service Center, where it is stored in the container storage areas (CSAs) in the warehouse. Periodically, a box trailer truck is dispatched to deliver containers of fresh solvent and collect the containers of spent solvent for reclamation.

A unique feature of this system is that Safety-Kleen provides a "erased loop" system for the recycling of spent solvents. Safety-Kleen delivers clean recycled solvent to the customer and picks up the spent solvent and transports the spent solvent to Safety-Kleen Recycle Centers where It is distilled into recycled solvent. The recycled solvent or virgin solvent is provided to the customer as part of a machine lease agreement or as part of a COMS service agreement.

A third type of parts cleaner service is available from Safety-Kleen, which utilizes an aqueous cleaning solution. The aqueous parts cleaning units are similar to the petroleum naphtha solvent-based units. On a regularly scheduled basis, a Safety-Kleen representative cleans and inspects the parts cleaner unit and replaces spent material with clean product. A Safety-Kleen representative collects the containers of spent material and stores them in a contained area at the Service Center. Periodically, a box trailer truck is dispatched to deliver containers of fresh solvent and collect the containers of spent solvent.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents. These wastes are containerized on the customers' premises and are periodically collected by a Safety-Kleen representative. The containerized waste is accumulated in a contained area of the warehouse prior to transport to a Safety-Kleen accumulation center, recycle center. or other permitted facility.

1.1.3 Paint Waste Collection Service

In 1986, Safety-Kleen initiated a paint waste reclamation program to service the automobile body repair business. Paint gun cleaning machines are leased to customers with a reservoir of lacquer thinner. On a periodic basis the reservoir is replaced and the spent thinner is transported back to the Oklahoma City Service Center for shipment to a reclamation facility. Wastes containing various thinners and paints are also collected in containers on the customers' premises. A Safety-Kleen representative collects these containers and stores them in an enclosed metal shelter which is separate from the office/warehouse. These wastes are transported to a Safety-Kleen Recycle Center or other reclamation facility and the regenerated solvent is distributed to Safety-Kleen customers for use as a product

1.1.4 Aqueous Cleaning Solution

Spent aqueous cleaning solution is a by-product of brake and/or parts cleaning operations involving aqueous-based cleaners. Based on Safety-Kleen's experience, a small percentage of the cleaning solution may be contaminated from sprays used in shops which have not all together eliminated the use of chlorinated solvents. Although only a small percentage of spent aqueous cleaning solution will be contaminated with solvents, Safety-Kleen considers it prudent to manage spent aqueous cleaning solution as hazardous, unless the generator has analytical data to prove otherwise or certifies that he/she does not use chlorinated solvents in their operations.

Depending on transportation options, Safety-Kleen may choose to commingle the spent aqueous cleaning solution with the spent parts washer cleaning solution in the return and fill drum washer/dumpster unit. This material is then transferred and stored in the facility's bulk waste storage tanks. Empty containers are rinsed and the rinsate is managed as facility-generated waste. If the aqueous solution is commingled, the commingled solution is shipped via a tanker truck to a recycling facility in the same manner as spent parts washer cleaning solution.

1.1.5 Photographic Imaging Waste Collection Service

In 1994, Safety-Kleen began offering a photographic waste reclamation program to medical and dental service industry and photo-imagining facilities. In addition, Safety-Kleen offers a metal replacement unit with two self-contained cartridges in series for silver-bearing wastes. The unit is serviced on a regularly scheduled basis by a Safety-Kleen representative who cleans and inspects the

unit and replaces the self-contained cartridges with new ones. Wastes containing solution and film negatives are collected in containers on the customer's premises. The Safety-Kleen representative collects these containers and transports them to the facility. The wastes are shipped to a metal reclaimer for precious metal reclamation.

1.1.6 Oil and Oily Water

Used oil and oily water is collected at customer locations in containers. The containers are transported back to the Oklahoma City Service Center and stored in the container storage area (CSA) for future shipment to a Safety-Kleen recycle center.

1.1.7 Transfer Wastes

Safety-Kleen may also manage other industrial wastes such as solvents, debris, spill cleanup, plating waste etc., which *may* be hazardous. These wastes are shipped from the generator to the Oklahoma City Service Center in various DOT-approved containers. This waste is managed at the service center on a transfer (10-day) basis.

1.1.8 Household Hazardous Waste

Safety-Kleen also offers a service for the collection of household hazardous waste. The containers are transported back to the Oklahoma City Service Center and are stored in the container storage area (CSA) for future shipment to a Safety-Kleen recycle center.

1.2 DESCRIPTION OF THE FACILITY [40 CFR 270.14(b)(1)1

The Oklahoma City Service Center has been operating as a storage facility since July 1, 1985. The facility consists of the following structures:

a. A 7,000 square foot warehouse with offices and a contained area for container storage

b. A 300 square foot enclosed metal shelter used for container storage.

c. Two 16,800 gallon and one 12,000-gallon aboveground storage tanks. One 16,800-gallon tank and the 12,000-gallon tank are for clean parts washer solution. The other 16,800-gallon tank is for spent parts washer solution/spent aqueous solutions.

e. A solvent return and fill station with a loading dock and two drum washer/dumpster units with a storage capacity of375 gallons each

Descriptions of the surrounding area and of waste management practices at the Oklahoma City Service Center follow.

Applicable maps and facility drawings are in Appendix C .

1.2.1 Solid Waste Management Units

The four solid waste management units associated with this facility are the container storage area in the warehouse, the metal storage building, the solvent return and fill station, and the tank farm. The units are used for storage in tanks (S02) and containers {S01). The location of the units, general dimensions and structural descriptions can be found in the associated maps located in Appendix C. The units have been in service at the location since July 1, 1985. Wastes managed in the units can be found in the Facility Description Abstract. In the event of a release from one of the SWMUs, available information pertaining to the release of hazardous waste would be provided to the DEQ.

1.2.2 Regional Description

The Oklahoma City Service Center is located in Oklahoma County, Oklahoma approximately 2000 feet southwest of the intersection of State Highway 152 (also known as Newcastle Road) and SW 59th Street. This area is zoned for fight industrial use: To the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may be in conflict with Safety-Kleen's operations at this site.

Oklahoma County *covers* approximately 718 square miles. The City of Oklahoma City has a population of approximately 718,000. Oklahoma County is part of the Oklahoma City metropolitan area and is an urban/suburban area. Oklahoma County has a temperate, continental climate of the moist, subtropical type. The average summer {June-August) high temperatures range between 88 and 93°F. Winds from the south bring warm air and high humidity, but not high precipitation rates. Average summer months' rainfall is approximately 13 inches. Average total annual precipitation is 36 inches with 9 inches of that being snow. The average winter (December-February) high temperatures range between 36 and 42°F. Average winter lows range between 26 and 31°F. The area's climate is described as "temperate", meaning there are marked seasonal contrasts in temperature and precipitation and with occasional extremes in both temperature and precipitation. Tornadoes and damaging hailstorms are relatively common in the county.

The Service Center is located above the 100-year floodplain. See Appendix C for a copy of the FEMA flood insurance rate map. *[40* CFR 270.14(b)(11)(iii)].

The water table in this area is typically within 20 feet of the land surface. Beneath the service center lie two significant aquifers: a shallow aquifer comprised of unconsolidated alluvium and terrace deposits and a deeper aquifer in sandstone bedrock. The unconsolidated alluvium and terrace aquifer in the vicinity of the service center is an important source of water for the irrigation of crops. In this region, the aquifer provides water for irrigation, municipal and industrial use. The water supply of the Oklahoma City Service Center is from a water main supplied by the City of Oklahoma City.

There are numerous oil and gas wells in the Oklahoma City area; none, however, exist within ¼ mile of the service center. Also, none of the following exist within ¼ mile of the facility:

- Public water supply wells.
- Schools
- Parks
- Critical habitats

The non-building areas of the facility are paved with concrete, asphalt or gravel, as noted on the site plan in Appendix C. The majority of the vehicular traffic and loading/unloading operations occur at or near the return and fill station and these areas are paved with concrete. The entrance to the facility is on Highway 152 (Newcastle Road) and is approximately 1 ½ miles southwest of the intersection of MacArthur Boulevard and Highway 152. Interstate 40, running east-west in the region, and Interstate. 35, running north-south serves as the major access roads to the Oklahoma City Service Center. Safety-Kleen vehicular traffic from Interstate 40 normally exits at MacArthur Boulevard and travels south to the intersection of Highway 152. Traffic from Interstate 35 typically uses Interstate 240 and travels west to the MacArthur Boulevard exit Highway 152 was designed in accordance with engineering criteria appropriate for sustaining traffic volume in this area. The route trucks that travel the daily routes between the Service Center and customers use Highway 152 to enter/exit the facility. The trucks dispatched from the Recycle and Accumulation Centers to deliver fresh materials/solvents and pick up used solvents perform the activities at the aboveground tank area, at the return and fill area, or at the raised dock behind the warehouse.

Box trailers dispatched from the Recycle Centers currently pick up approximately 90 containers per week from the Oklahoma City Service Center. This includes containers of spent parts washer solvent, immersion cleaner, dumpster sediment dry cleaning waste, paint waste, photographic waste, aqueous cleaner waste, spent industrial fluids, and other transfer wastes. Service Center trucks exit the facility in the morning with containers of clean solvent and return at the end of the business day with containers of waste.

The tanker trucks which serve the Oklahoma *City* Service Center typically use the northeast gate for both entry and exit to and from the facility (this may change if necessary and the tanker may enter/exit through the northwest gate also).

1.2.3 Waste Management Practices

The Oklahoma City Service Center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The CSA, aboveground storage tanks, and the return and fill all have secondary containment, and the Service Center has the equipment necessary for employees to safely manage waste onsite. Appendix C, Maps and Facility Drawings, contains drawings of the waste mF1nagement facilities.

Proper handling of hazardous waste is ensured through proper training. Employees are trained on hazardous waste procedures during their initial training and then annually.

The container storage area (CSA) in the warehouse and the metal shelter are for the storage of (1) spent parts washer solvent, (2) spent aqueous parts washer solvent, (3) spent aqueous brake cleaner, (4) drum washer/dumpster sediment, (5) spent immersion cleaner (6) dry cleaning wastes, (7) paint wastes, (8) photographic imaging wastes, (9) contaminated debris, and (10} transfer wastes. The wastes are stored in properly labeled containers to indicate their contents. These containers are inspected each operating day, typically Monday through Friday, to ensure they are properly labeled and that the 10-day transfer limit is not exceeded. Other materials and products which are not regulated may also be stored in this area.

The CSA in the warehouse is an approximately 500 square foot area within a metal-framed building. It has secondary containment in the form of a concrete floor and curbing with chemical-resistant epoxy coating and two collection trenches. The dimensions of each trench are 8.25' x 1.5' x 1' with a containment volume of 92.5 gallons each. Total secondary containment (both trenches) is 185 gallons. No more than 1728 gallons of waste materials will be stored in the CSA at any time.

The metal shelter drum storage area is a 300 square foot free-standing building. It has secondary containment in the form of a 20' x 15' x 6" metal pan at its base and has a total containment volume of 1122 gallons. No more than 2184 gallons of waste materials will be stored in the building at any time.

Waste containers will be stored on pallets (where feasible) and adequate aisle space will be maintained in the CSAs. Containers will be moved with a forklift, pallet jack, or drum dolly.

At the Oklahoma City Service Center, spent parts cleaning solvents and spent aqueous solutions are accumulated in a 16,800-gallon aboveground storage tank via the return and fill station. Containers of spent parts cleaning solvents and spent aqueous solutions are emptied into a drum washer/dumpster unit in the return and fill station. Material in the drum washer/dumpster is pumped into the spent solvent storage tanks. The return and fill station has secondary containment in the form of a 40' x 23' x 4" epoxy-coated concrete slab at its base with a total containment capacity of 2292 gallons.

The aboveground tanks have been designed in accordance with NFPA standards and are constructed of carbon steel and are designed to be compatible with the materials stored within them. The tanks' exteriors are painted a light color to reflect sunlight and minimize corrosion by protecting the steel. Any corrosion that may develop will be easily observed due to the light color of the paint.

The secondary containment for the solvent tank farm is a steel reinforced concrete slab and dike measuring approximately 52' x 21' x 4' with a secondary containment capacity of 32,672 gallons. There are three aboveground storage tanks located in the tank farm. One 16,800-gallon tank for spent parts washer solvent, one 16,800 gallon tank for clean parts washer solution and one 12,000 gallon tank for clean parts washer solution. Each tank is equipped with an audiovisual high-level alarm.

SAFETY-KLEEN SYSTEMS, INC.

OKLAHOMA CITY, OKLAHOMA

PERMIT ATTACHMENT 2

WASTE ANALYSIS PLAN

WASTE ANALYSIS PLAN ABSTRACT

WASTE DESCRIPTION	EPA WASTE CODES	ESTIMATED FACILITY CAPACITY[1]	ESTIMATED ANNUAL AMOUNT [2]
Spent Parts Washer Solvent	D001[3]	20,779[4,5]	451
Bottom Sediment from Waste Tanks	D001[3]	N/A	Variable
Spent Immersion Cleaner	D006[3]	3,979[4]	13
Dry Cleaning Waste	D001 or F002[5]	3,979[4]	57
Paint Waste	D001, F003, and F005[8]	3,979[4]	34
Drum Washer/Dumpster Sediment	D001[3]	3,979[4]	54
Aqueous Brake Cleaner Solution	D039[3]	20,779[4,5]	35
Aqueous Parts Cleaning Solution	Varies[3]	20,779[4,5]	39
Photographic Imaging Waste	D011[3]	3,979[4]	5
Transfer Waste	Varies[3,4]	3,979[4]	Variable
Contaminated Debris	F002, F003, F005[9]	3,979[4]	30

[1] The estimated facility capacity in gallons

[2] The estimated annual amount in thousands of gallons

[3] In addition to the code(s) listed above, these codes may be applicable: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

[4] The total amount of containerized waste stored in the warehouse container storage area will not exceed 1,728 gallons and the total amount stored in the metal shelter will not exceed 2,184 gallons

[5] The total amount of spent parts washer solvent and spent aqueous solution stored in the waste tank will not exceed a maximum of 16,800 gallons

[6] In addition to the code(s) listed above, these waste codes may be applicable: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

7 Any of the following waste codes may be applicable: D001, D002, D003, D004, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015, D016, D017, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F001, F002, F003, F004, F005, F006, F007, F008, F009, F010, F011, F012, F019, F024, F025, F032, F033, F034, F035, F037, F038, F039

K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K034, K035, K036, K037, K038, K039, K040, K041, K042, K043, K046, K048, K049, K050, K051, K052, K060, K061, K062, K064, K065, K066, K068, K071, K073, K083, K084, K085, K086, K087, K088, K090, K091, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K107, K108, K109, K110, K111, K112, K113, K114, K115, K116, K117, K118, K123, K124, K125, K126, K131,

K132, K136, K140, K141, K142, K143, K144, K145, K147, K148, K149, K150, K151, K156, K157, K158, K159, K160, K169, K170, K171, K172, K174, K175, K176, K177, K178

P001, P002, P003, P004, P005, P007, P008, P010, P011, P012, P013, P014, P015, P016, P017, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, P033, P034, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P054, P056, P057, P058, P059, P060, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P081, P082, P084, P085, P087, P088, P089, P092, P093, P094, P095, P096, P097, P098, P099, P101, P102, P103, P014, P105, P106, P108, P109, P110, P111, P112, P113, P114, P115, P116, P118, P119, P120, P121, P123, P127, P128, P185, P188, P190, P191, P192, P194, P196, P197, P198, P199, P201, P202, P203, P204, P205

U001, U002, U003, U004, U005, U007, U08, U009, U010, U011, U012, U014, U015, U016, U017, U018, U019, U021, U022, U024, U025, U026, U027, U028, U029, U030, U031, U032, U034, U035, U036, U037, U038, U039, U041, U042, U043, U044, U045, U046, U047, U048, U049, U050, U051, U052, U053, U055, U056, U057, U058, U059, U060, U061, U062, U063, U064, U066, U067, U068, U069, U070, U071, U042, U073, U074, U075, U076, U077, U078, U079, U080, U081, U082, U083, U084, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U097, U098, U099, U101, U102, U103, U105, U106, U107, U108, U109, U110, U111, U112, U113, U114, U115, U116, U117, U118, U119, U120, U121, U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U134, U135, U136, U137, U138, U140, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U151, U152, U153, U154, U155, U156, U157, U158, U159, U161, U162, U163, U164, U165, U166, U167, U168, U169, U170, U171, U172, U173, U174, U176, U177, U178, U179, U180, U181, U182, U183, U184, U185, U186, U187, U188, U190, U191, U192, U193, U194, U196, U197, U200, U201, U202, U203, U204, U206, U207, U208, U209, U210, U211, U213, U214, U215, U216, U217, U218, U219, U220, U221, U222, U225, U226, U227, U228, U235, U236, U237, U238, U239, U240, U243, U244, U246, U247, U248, U249, U271, U277, U278, U279, U280, U328, U353, U359, U364, U365, U366, U367, U372, U373, U375, U376, U377, U378, U379, U381, U382, U383, U384, U385, U386, U387, U389, U390, U391, U392, U393, U394, U395, U396, U400, U401, U402, U403, U404, U407, U408, U410, U411

[8] In addition to the code(s) listed above, these waste codes may be applicable: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

[9] In addition to the code(s) listed above, these waste codes may be applicable: D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

2.0 WASTE ANALYSIS PLAN [40 CFR 270.14(b)(3)]

2.1 DESCRIPTION OF WASTES

Several types of waste result from the servicing of Safety-Kleen customers and maintenance of the facility. Descriptions of these wastes are as follows:

2.1.1 Wastes Resulting From the Parts Washer Service

Spent parts washer cleaning solvent and spent aqueous solutions are accumulated in a 16,800-gallon aboveground storage tank via the return and fill station. Containers of parts washer waste are emptied into the drum washer in the return and fill station, which in turn, empties into the tanks. Additionally, parts washer wastes may also be managed in containers. This waste handling method results in the following types of parts washer solvent waste:

a. Spent Parts Cleaning Solvents and Spent Aqueous Solutions: The spent parts cleaner solvent is removed from the tank by a tanker truck on a varying schedule. This waste is ignitable (D001) and may exhibit the toxicity characteristics: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, 0023, D024, D025, D026, D027, D028, D029, D030,0032, D033, D034, D035, D036, D037, D038, D039, D040, 0041, D042, D043. The spent parts washer waste will be transported to a Safety-Kleen Recycle Center or other property permitted facility.

b. Bottom Sediment in the Tanks: Periodically, it is necessary to remove sediment and other heavy material from the bottom of the tanks. A vacuum truck is typically used for this purpose. The sediment may be ignitable (D001) and may exhibit the toxicity characteristics: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, 0028, 0029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042,

D043. This waste is transported to a Safety-Kleen Recycle Center or other property permitted facility.

c. Dumpster Washer/Dumpster Sediment: Sediment also accumulates in the bottom of the drum washer in the return and fill station. This sediment is typically removed manually with shovels or scoops. It is placed in a satellite accumulation container in the return and fill area and moved to a container storage are once full. The chemical composition of this waste is analogous to that of the bottom sediment from the tank. This waste sediment will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

d. Spent Immersion Cleaner: This waste remains in the container in which it was originally used until it is received at the recycle center. The immersion cleaner may exhibit the toxicity characteristics: D004, D005, D006, D007, 0008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043. The waste immersion cleaner will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

e. Aqueous Brake Cleaner Waste: This waste may be placed into the spent parts cleaner tanks, bulked onsite into larger DOT-approved containers and stored in any of the CSAs, or remain in the container in which it was originally used/transported until it is received at the Recycle Center. The aqueous parts cleaner waste may exhibit the following toxicity characteristics: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043. This waste will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

2.1.2 Wastes Resulting from Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, separator water, powder residue from diatomaceous or other powder filter systems, still bottoms, and other dry cleaning

solvent contaminated wastes. These wastes are packaged on the customer's premises in containers. While approximately 95 percent of the dry cleaning waste that customers generate is perchloroethylene waste (F002), the remaining generate waste that contains either mineral spirits/petroleum naphtha (D001), trichloro-trifluoroethane (F002), or 1,1,1-trichloroethane (F002). The dry cleaning waste may exhibit the following toxicity characteristics: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, 0024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043. The waste remains in the container in which it was originally packaged until it is received at a Safety-Kleen Recycle Center or other properly permitted facility. Mineral spirits and trichloro-trifluoroethane wastes are managed as transfer wastes at the facility.

2.1.3 Wastes Resulting from Paint Gun Cleaner Service

Paint wastes consist of various lacquer thinners such as acetone, isopropyl alcohol, methyl ethyl ketone, toluene, xylene and acetate compounds (D001, F003, and F005) and may also exhibit the following toxicity characteristics: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, 0024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043. The wastes are packaged on the customer's premises. These containers may be stored in any or all of the CSAs. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

2.1.4 Transfer Wastes (also known as Containerized Waste Services)

Safety-Kleen offers Containerized Waste Service (CWS) to customers. Under this service, the Service Center manages hazardous wastes and non-hazardous wastes from our industrial customers. The service involves picking up containerized CWS wastes from generators and transporting them to the facility for storage. The containers

are accumulated in the CSAs of the east and west warehouses and metal shelter prior to transport to a Safety-Kleen Accumulation Center, Recycle Center, or other property permitted facility.

CWS wastes may include various solvents (including halogenated and non-halogenated solvents - F001, F002, F004) and ignitable solvents (D001), acids and caustics (D002), lacquer thinners and paint wastes (D001, F003, F005), imaging wastes (D011), and various non-liquid hazardous wastes.

The following RCRA hazardous waste categories and codes may be stored in the CSAs: ignitable wastes (D001), corrosive wastes (D002), reactive wastes (D003) and toxic wastes which may exhibit any of the following toxicity characteristics (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, 0024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043).

Occasionally U-listed, P-listed and rarely K-listed wastes are also stored as transfer (CWS) waste. These wastes could contain any or all of the above-referenced waste codes, as well as any or all of the waste codes listed on Waste Analysis Plan Abstract under footnote #7.

All transfer (CWS) wastes are containerized by the customer and picked by the Oklahoma City Service Center for storage prior to transport to a Safety-Kleen Accumulation Center. Recycle Center, or other property permitted facility.

2.1.5 Photographic Imaging Waste Collection Service

Photographic imaging wastes consist of fixer and developer solutions, other associated photographic solutions and waste containing silver and film negatives. Photographic imaging wastes exhibit the toxicity characteristic D011. The wastes are packaged on the customer's premises. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

2.1.6 Contaminated Debris

Solid and liquid debris wastes are typically accumulated at the return and fill station and in the east and west warehouses, however, additional satellite contaminated debris drums may be found at various locations throughout the facility. Typically, wastes such as rags, wipes, gloves, sampling equipment, absorbents, etc. are placed in satellite containers. Once the satellite containers are full, they are moved to a container storage area (CSA) until shipped to a Safety-Kleen Recycle Center or other properly permitted facility. The contaminated debris may carry the following waste codes: F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, 0024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043.

2.2 QUALITY CONTROL PROCEDURES

Spent materials are the primary feedstock for the generation of Safety-Kleen recycled solvent products. As a result, quality control of the spent materials is necessary to monitor product quality and regulatory consistency. The Oklahoma City facility collects spent materials from thousands of customers, most of whom are small quantity generators, and containers containing recoverable solvents are returned to the Service Center for shipment to a Recycle Center or other permitted facility. With such large numbers of waste generators and waste shipments, performing detailed analyses at the facility is economically and logistically infeasible.

Most of the materials collected at the Service Center are managed in the closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known, and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the Service Centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality

product.

The generator will notify the Safety-Kleen Representative upon servicing, if the process or nature of his business has changed. If it is suspected that that waste is non-conforming material the generator will be contacted. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material. Records of all rejected wastes will be kept on file at the Service Center. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

Commented [ZJE1]: I did change this. The previous permit said we sample which we do not. It's on the generator to profile their waste.

2.2.1 Parts Cleaner Service

Prior to leasing a parts cleaning machine or placing a COM (customer owned machine) service, the customer's business is reviewed. Where the possibility exists for contamination of the parts cleaner solvent (e.g., pesticide, herbicide or pharmaceutical operations), the process is reviewed to ensure that the solvent is protected from the sources of contamination. In reviewing a customer's business, the Safety-Kleen Representative provides parts washer customers with written and verbal information on use of the parts washer unit This information will contain at a minimum:

- Proper usage and management of the unit
- Information on the reasons to not add materials to the unit, and examples of what not to add to the unit

Safety-Kleen Representatives are instructed to visually examine the spent solvents when the machines are serviced, noting the quantity, odor, and appearance of the material recovered as follows:

a. The quantity of used solvent in the drum - When the amount of parts cleaner solvent, immersion cleaner liquid, or aqueous parts cleaning solvent is more than 25% greater than originally supplied, the process will be reviewed to prevent contamination of the solvent or site specific profile is completed for the service. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.

b. The odor of the liquid in the container - Personnel must never make an effort to "sniff" the solvent. However, if in the normal course of servicing the customer, the odor of the liquid in the container is noticed to be different from that of parts cleaner solvent, immersion cleaner, or aqueous parts cleaning solvent, the process will be reviewed to prevent contamination of the solvent or site specific profile is completed for the service. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.

c. The appearance of the liquid in the drum - The spent parts cleaner solvent is normally greenish-brown, and aqueous parts cleaner waste should have an almost black appearance. Certain contaminants containing dyes and color pigments (such as transmission fluid, printers' ink, and water-based paints) may change the color of the spent parts cleaner solvent to other colors. Spent immersion cleaner should have a dark brown to almost black appearance. The immersion cleaner is a single-phase liquid. Liquids in the containers which deviate from the above description or which contain substantial amounts of water, high density solvent and/or oil at the bottom will be reviewed to prevent contamination of the solvent or site specific profile is completed for the service. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.

It should be noted that tank bottoms waste and drum washer/dumpster sediment waste are generated as a result of processing parts washer waste and aqueous parts/brake cleaning wastes, the safeguards outlined in 2.2.1 (a through c) ensure the waste streams remain consistent

At the Service Center, the Safety-Kleen representative or the material handler again observes the quantity, odor, and appearance prior to emptying the parts cleaner solvent into the wet dumpster. Drums with questionable contents are managed as described above. All other containers (immersion cleaner, aqueous parts cleaning solvent) are verified upon receipt at a Recycle Center. In addition, receipt analysis is performed by the Safety-Kleen Recycle Centers on all inbound bulk spent solvent deliveries; including a screen for atypical flash point, PCBs, and halogenated organics.

2.2.2 Dry Cleaner and Paint Waste Collection Service

The dry cleaner and paint wastes are collected from facilities where typically there is one process and the possibility of cross-contamination from other chemicals or wastes is minimal. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

2.2.3 Transfer Waste (also known as Containerized Waste Service)

Containerized Waste Service (CWS) are collected from primarily industrial customers. CWS wastes may include cleaning solvents, halogenated solvents (F001, F002, F004), acids and caustics (D002), lacquer thinners and paint wastes (D001, F003, F005), imaging wastes (D011), and various coolants. CWS wastes may also exhibit the following toxicity characteristics: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, 0024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043.

The service involves picking up containerized wastes from the generators and transporting them to the facility for storage. The containers are accumulated in the container storage areas of the facility prior to transport to a Safety-Kleen Accumulation Center, Recycle Center, or other properly permitted facility. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

2.2.4 Photographic Imaging Waste Collection Service

Photographic imaging wastes are the result of developing and fixing of photos. Wastes are collected from. facilities where typically one process is managed and the possibility of cross contamination from other wastes or chemicals is minimal. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen

Recycle Center or other properly permitted facility.

Samples of this waste are collected at the Recycle Center. The contents are either verified and accepted, or the container is rejected. Rejected wastes are either returned to the customer or properly disposed at an approved facility.

2.3 RECHARACTERIZATION OF WASTE STREAMS [40 CFR 270.14(b)(2)]

To further monitor product quality and regulatory consistency, Safety-Kleen randomly samples its customers' waste streams on a yearly basis. Samples are sent to an accredited 3rd party environmental laboratory for pH, flash point determination, and TCLP analysis. Resulting data is subjected to an EPA SW849 approved statistical model and information is used to assist the waste characterization process. A summary of Safety-Kleen's Annual Recharacterization Program can be found in Appendix D.

2.4 WASTE ANALYSIS PLAN UPDATE [40 CFR 270.14(b)(3)]

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is the responsibility of the corporate Environmental Compliance Department.

2.5 LAND BAN NOTIFICATION / CERTIFICATION FORMS (40 CFR 268)

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfill disposal.

This notice is required paperwork for all Safety-Kleen waste types. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the Notice is kept in the files of the receiving/terminating facility.

2.6 SUBPART CC COMPLIANCE (40 CFR 264 SUBPART CC)

The Safety-Kleen Oklahoma City Service Center shall control air pollutant emissions for applicable hazardous waste management units at this facility pursuant to the requirements of RCRA Subpart CC, through implementation of this compliance program.

This plan describes this facility's waste determination procedures, tank and container design/management practices, organic emission controls, inspection and monitoring, and recordkeeping and reporting requirements, pursuant to standards promulgated under RCRA Subpart CC.

2.6.1 Waste Determination Procedures (40 CFR 264.13)

Waste Determination

For purposes of waste determination, the facilities utilize knowledge developed in the Waste Characteristics portion of the sites' hazardous waste permit on an annual basis, the waste streams are recharacterized by collecting small retain samples of each waste shipment arriving at a Safety-Kleen Recycle Center for a period of several weeks. Analyses are performed on composite samples, including flash point, pH, specific gravity, and TCLP (metals, volatiles, and semi-volatiles). Other analyses are performed throughout the year as necessary. In addition, the facility may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all hazardous waste managed in tanks or applicable containers at the facility may contain an average volatile organic concentration of greater than 500 ppmw at the point of waste generation. Therefore, all hazardous wastes managed in tanks or applicable containers shall be managed in accordance with applicable Subpart CC control standards. Under such a management scenario, no direct measurements will be conducted. This is consistent with 40 CFR

264.1083(a)(1).

Point of Waste Origination

The point of waste origination for all hazardous wastes generated from off-site sources and transported to a Safety-Kleen Service Center in DOT authorized containers, which will subsequently be managed in tanks or containers on-site, is the facility boundary at the entrance gate.

For hazardous waste generated on-site, the point of waste origination is the point of hazardous waste generation, as defined under hazardous waste regulations.

2.6.2 Container Standards [40 CFR 264.1086]

Containers managing hazardous wastes generally fall into three categories:

1. Hazardous waste containers less than 26 gallons in capacity are wholly exempt from consideration under Subpart CC. Containers of hazardous wastes that are transferred through the facility are "still in the course of transportation" and therefore are exempt from Subpart CC.
2. Containers with capacities between 26 gallons and 122 gallons are all Level 1 containers. The Level 1 containers have covers that are designed with no gaps, holes, cracks, or other open spaces into the container. In addition, all containers used to handle hazardous waste meet U.S. DOT Performance Oriented Packaging Standards.
3. Containers of greater than 122 gallons that manage hazardous wastes at this facility are not in light service and are Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container.

Level 1 Containers [40 CFR 264.1086(c)]

Provided below is a summary table of the criteria applicable for a container to be identified and managed as a Level 1 container.

Level	Volume	Usage	Requirements
Level 1	<25 gallons but ≤ 122 gallons Or >122 gallons	Any hazardous waste not "in light material service"	-Meet DOT specs or is a lab pack -Keep closed except when adding or removing waste -Safety relief device -Minimize exposure of waste when transferring

A hazardous waste is a "light material" if it (1) contains at least one organic constituent with a vapor pressure above 0.3 (kPa) at 20°C, and (2) has a total concentration of such constituents of 20% or greater by weight. This definition will generally apply to all hazardous waste received at the facility in non-bulk containers.

2.6.2.1 Inspections [40 CFR 264.1086(c)(4)]

All hazardous waste received from offsite sources are received in containers. All Level 1 containers managing hazardous waste subject to Subpart CC received from off-site sources that will not be completely emptied within 24 hours of receipt will be inspected to ensure that all applicable covers and closure devices are closed. This inspection already occurs as part of the facility inspection. Therefore, compliance with the inspection requirements of Subpart CC is incorporated in the facility inspection plan by this reference.

Defective containers will be remediated within 24 hours of observation, and initial remediation will be attempted within 12 hours observation.

On-Site Generated Hazardous Waste containers greater than 26 gallons will be visually inspected upon their initial filling to ensure that all openings are properly closed and/or covered. Satellite accumulation containers managed in accordance with 40 CFR 262.34(c)(1) are not subject to Subpart CC requirements.

2.6.2.2 Monitoring [40 CFR 264.1088]

Off-Site hazardous Waste Level 1 containers managed at the Service Center are not subject to monitoring for no detectable emissions (NDE). Therefore, no monitoring for NDE will be conducted on such containers. However, they will be closed when not involved in transfer activities.

2.6.2.3 Transferring Hazardous Waste [40 CFR 264.1086(c)(3)(i),(ii)]

Container to container transfer will typically be done at the Service Center when it is necessary to remove waste from a damaged container to a non-damaged container that will provide containment for the waste, or to place the entire container into a larger container. An example would be placing a 55 gallon container into an 85 gallon salvage drum. This may occur for both liquid and solid wastes. Only container openings that are necessary to add or remove waste from each container will be open during the transfer. This activity will be conducted in accordance with 40 CFR 265.1087(c)(3)(ii) for Level 1 containers.

Container to tank transfer involving liquids will be done regularly for Level 1 containers. Following is an explanation of this activity.

Spent mineral spirits from parts washers is accumulated in two (2) 8,000 gallon aboveground storage tanks via the Return and Fill station. Typically, 5-, 16-, 30-, and 55-gallon containers are poured into the dumpster in the return and fill station, and the material in the dumpster is pumped into the spent solvent storage tank. The return and fill station has secondary containment in the form of reinforced concrete slab and curbs.

Commented [ZJE2]: Is this correct? or is it just one tank?

2.6.3 TANK STANDARDS (40 CFR 264.1084)

Safety-Kleen will manage organic wastes at the Service Center in the waste mineral spirits storage tank. The waste mineral spirits storage (WMSS) tank will manage

hazardous waste with 500 ppmw or greater VO Concentration. Therefore, this tank is subject to Level 1 controls. Please note, there are two other storage tanks at the Service Center, but they are not utilized to store hazardous waste and therefore are exempt from regulation under Subpart CC.

The WMSS tank is a non-pressurized, vertical, aboveground storage tank. It is constructed with a fixed roof and is 20' tall and 12' in diameter. The WMSS tank has a 16,800 gallon storage capacity. The tank is constructed of 3/16" thick (1/4" thick in the lower third of the tank) carbon steel. The tank has an exterior coating of white paint. The tank is constructed in accordance with Underwriters Laboratories Standard 142. The waste in this tank exhibits a vapor pressure of less than 5.2 kPa (. 75 psia). The measured vapor pressure of the waste managed in tanks is = 0.2 psia. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 264.1083(c).

All of the tanks present at this Service Center are designed so that all opening covers can be closed with no visible gaps, holes, cracks, or other open spaces into the interior of the tank. The cover and all cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position at all times except when waste is being added to or removed from the tanks, or when necessary sampling or repair/maintenance is performed on the tanks.

The tanks are vented to the atmosphere through a safety device {pressure vacuum vent) which has been designed to operate with no detectable organic emissions when the device is in the closed position. These tanks are equipped with pressure vacuum vents that operate at 2oz of pressure and 1oz of vacuum. In addition, these tanks are designed with a long-bolted man way pressure relief device which remains in the closed position when not in use to relieve pressure.

Below is a summary of the criteria that must be met in order for Safety-Kleen's hazardous waste tank to be subject to Level 1 controls.

Tank Design Capacity	Maximum Vapor Pressure of

<19,789 Gallons	11.26 psi
19,789 Gallons - < 39,841	4.0 psi
>39,841 Gallons	0.75 psi

2.6.3.1 Level 1 Tank [40 CFR 264.1084(c)]

The Level 1 tank must be managed with a fixed roof. All openings in the tank systems must be closed except when adding, removing, or conducting routine maintenance on the tanks. Safety devices and conservation vents are allowed on such tanks.

The WMSS tanks store waste mineral spirits. Safety-Kleen manages 2 different types of mineral spirits. Vapor pressure testing performed on these materials in product form, identify the following:

SK 105 Mineral Spirits is .008 psia at 68°F
SK 150 Mineral Spirits is .004 psia at 68°F

Commented [ZJE3]: Does this site mange 105 still?

Since the materials have vapor pressures that are significantly lower than the maximum threshold of 11.26 psia for Level 1 tanks, Safety-Kleen Systems, Inc. has determined that the hazardous waste storage tanks at the Service Center have a design capacity of less than 19,789 gallons, therefore the waste materials are subject to Level 1 controls.

The vapor pressure of the waste in the tank will fluctuate on a periodic basis due to the cyclic generation of hazardous waste streams by off-site generators. The maximum vapor pressure in the hazardous waste tank will not exceed the applicable Level 1 threshold. The maximum organic vapor pressure is determined using process knowledge of the hazardous waste historically managed pursuant to 40 CFR 264.1084(c)(1).

2.6.4 CLOSED VENT SYSTEMS AND CONTROL DEVICES (40 CFR 264.1087)

This standard is not applicable because the hazardous waste management unit (i.e., tanks and containers) requiring such control equipment, in accordance with RCRA

Subpart CC, are not managed at this facility.

2.6.5 INSPECTION AND MONITORING (40 CFR 264.1088)

Visual inspection of the tank closure devices will be conducted on an annual basis. In addition, the hazardous waste storage tank is inspected during the facility's daily inspection. This daily inspection includes check of the high level alarm and of the volume (according to the gauge) held in the tank. Sudden deviations in the solvent volumes will be investigated and the cause determined. If necessary, repairs will be initiated immediately. The hazardous waste solvent must not exceed 95% of the tank volume at any time. The piping and secondary containment for tank is checked for leaks, cracks, or other deterioration. Any damage to the tank, piping (such as rust, seepage, or loose fixtures) must be noted and repairs initiated.

2.7 MISCELLANEOUS UNITS (40 CFR SUBPART X)

2.7.1 Summary

Safety-Kleen has 2 Return and Fill stations. These units are square metal structures approximately 3' deep by 6' wide by 4' high. The top lid is a manually operated door that is open during the washing of drums. The units have a sump with a maximum capacity of 40 gallons. The sumps are hard-piped to the adjacent permitted hazardous waste storage tank. The sumps hold and recirculate the spent solvent to clean the emptied containers. The stations hold 2 drums, one for washing and one for draining. The units are kept closed when not in operation. The units are located in the return and fill area that is located adjacent to the warehouse. The Return and Fill area has secondary containment.

2.7.2 Detail Information

The following information describes the Return and Fill Stations:

a. The Return and Fill Stations are designed to handle approximately 50 gallons per minute, based on equipment specifications.

b. The units were designed with generally accepted engineering design standards.
c. Drawings are provided in Appendix C.
d. The units are explosion proof.
e. Waste feed to the unit is manual so the feed cutoff is also manual.
f. Secondary containment is provided.

SAFETY-KLEEN SYSTEMS, INC.
OKLAHOMA CITY, OKLAHOMA

PERMIT ATTACHMENT 3

INSPECTION REQUIREMENTS

PREPAREDNESS AND PREVENTION PLAN

ABSTRACT

SECURITY MEASURES: The site is secured as follows:

1. There is a chain link fence topped with 3 strands of barbed *wire* surrounding the facility.
2. Warning signs are posted at all entrances
3. Locks are on all entrances to the warehouse and on the metal shelter
4. Remote controls for all tank operations are located inside the warehouse
5. There *is* nighttime outdoor lighting

INSPECTION PROCEDURES: See Appendix E for an example Facility Inspection Record

REQUIRED EQUIPMENT: The emergency equipment requirement is met With the following:

1. Internal communications will be by voice or intercom
2. Telephones are available in the office and the warehouse
3. Fire extinguishers are available at numerous locations in the warehouse, office, tank farm, return and fill and metal shelter as indicated on the Emergency Equipment Plan in Appendix F
4. Water is available from the City of Oklahoma City for various uses throughout the facility (i.e. emergency eyewash and shower). Water for fire fighting is available from a nearby fire hydrant
5. Spill containment equipment is available near storage and material handling areas.

3.0 PREPAREDNESS AND PREVENTION PLAN (40 CFR 264 SUBPART CJ

3.1 SECURITY MEASURES [40 CFR 270.14(b)(4)]

The facility is secured with a six foot high chain link fence topped with 3 strands of barbed wire surrounding the facility. All access gates are locked when the facility is unoccupied. The facility has warning signs stating "Danger-Unauthorized Personnel Keep Out," (or similar language) which are visible from twenty-five feet, posted at the entrances. In addition, outdoor lights are on at night

The office/warehouse buildings are secured with locks on all outer doors, and warning signs are posted at all entrances to work and waste storage areas. The container waste storage areas are located in the warehouse and metal shelter, which are locked during non-working hours. The tanks are_ inaccessible *in* that material can not be added or removed unless the pumps are activated, the controls for which, are located inside the warehouse. The pumps are not activated unless parts cleaner solvent product or waste is being added to or removed from the tanks by Safety-Kleen personnel. As a result, the tank and container storage areas are inaccessible except by Safety-Kleen personnel.

3.2 INSPECTION PROCEDURES [40 CFR 270.14(b)(5)1

The Service Center Manager (i.e., the Branch General Manager} or his designate is responsible for carrying out and documenting the facility inspection. The inspection will be conducted by an employee familiar with facility operations and inspection procedures. This may be the Branch General Manager, a Material Handler (warehouse person}, Secretary, Sales Representative, or a Sales Manager. The inspector must make a record of the inspection in an inspection log or summary, note any repairs that are needed, and assure that they are completed. If he cannot carry out the repairs, he must notify the Safety-Kleen Technical Services Department and request assistance. Completion of repairs also must be noted on the Facility Inspection Record. Records of inspections will be kept for three years from the date of inspection. See Appendix E for an example inspection form.

The facility inspections include the following:

a. Tank Inspections-At a minimum. the tanks holding product and spent materials are inspected each operating day, typically Monday through Friday. The inspections include checks of the high level alarm and of the volume held in each tank. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. The solvent waste must not exceed

95% of the volume at any time. The power to the high level alarm must be checked each operating day; it will sound when the tank's volume is 95% of capacity. All storage tanks at this facility are equipped with high level alarm systems.

The piping and secondary containment for the tanks must be checked for cracks or other deterioration. Insulated piping will be visually inspected for evidence of leaks. Any damage to tanks and piping (such as rust or loose fixtures} or secondary containment must be noted and repairs initiated.

b. Solvent dispensing equipment - The solvent dispensing hose, connections, and valves must be inspected for damage (such as cracks or leaks) and proper functioning. The pumps, pipes, and fittings must also be checked for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired.

c. Container Storage Areas (CSA} - The container storage areas are inspected each operating day, typically Monday through Friday. The number and condition of the containers are noted. The total volume of the waste held in the CSAs will not exceed the permitted volume for the area. The contents of any leaking or suspect containers must be placed in a container of adequate integrity. The containers will be properly labeled and marked in accordance with U.S. DOT and Oklahoma DEQ hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, repairs will be initiated immediately.

d. Drum washer/dumpster units - The wet dumpster units (in the return and fill station) must be inspected each operating day, typically Monday through Friday, for leaks and sediment buildup. Any leaks must be noted and repair must be initiated immediately. Excess sediment must be removed from the drum washer/dumpsters. The secondary containment must be checked for cracks and gaps. If cracks are detected, repairs will be initiated immediately.

e. Safety Equipment - The fire extinguishers must be checked to ensure that the units are charged and accessible. The operation of the telephone intercom/paging system and the eyewash units must be confirmed. The first aid kit and spill clean up equipment must be inspected for adequate content and accessibility. A list of emergency equipment is provided in Appendix F.

f. Security - The operation of each gate and lock must be checked weekly. In addition, the fence must be inspected for deterioration weekly.

g. *Air* Emission Standards -The facility does not operate process equipment *for* which the RCRA Subpart AA air emission standards apply. However, the facility utilizes several pumps, valves and other equipment for which Subpart BB standards do apply. This equipment will be subject to the leak detection and record-keeping requirements of Subpart BB. The facility conducts leak inspections, repair and recordkeeping requirements of Subpart BB. Each valve, flange and pump which js associated with the hazardous waste tank and its ancillary equipment must be marked in association with Subpart BB regulations. A piping schematic shows the location and the number assigned to each piece of the equipment. Compliance with the standard will be achieved through facility inspections. If required, leak detection monitoring and repair records are maintained. Records of equipment monitoring and repair are maintained in the operating record. If a potential leak is discovered (by visual inspection, audible indication, or excessive odor} it will be noted on the inspection form. Any leak detected will be repaired as soon as practicable, but at least within 15 days. The leaking piece of equipment must be tagged with the I.D. number, date of potential or actual leak, and the date of leak confirmation. The leak detection and repair record will be kept at the facility. See Appendix E for an example form.

Wastes managed at the Service Center have been determined to contain volatile organic compounds (VOCs) at concentrations greater than 500ppm by weight. Therefore, the storage tanks and containers used for the management of hazardous wastes at the service center are subject to Level 1 control requirements under Subpart CC. Visual inspections of containers and hazardous waste tanks will be completed as required by 40 CFR 264.1084. The initial inspection of the tanks was conducted when the tanks first became subject to the Subpart CC rule. No defects· were found during the visual inspection. The facility complies with Level 1 controls for containers by meeting DOT regulations for packaging hazardous materials and equipping containers with covers in accordance with the requirements of 40 CFR **264.1084.**

3.3 FACILITY DESIGN [40 CFR 270.14(b)(8))

The Oklahoma City Service Center was designed to minimize the possibility of spills or fires, and to minimize the effects of any accident that may occur. Specifications for the storage facilities, secondary containment, and other equipment are in Appendix E and descriptions follow.

3.3.1 Tank Storage

All tanks are constructed in accordance with Underwriters Laboratories Standard 142. The tanks are constructed of carbon steel and painted a light color to reflect sunlight The tank interiors are not coated. The tanks are located more than 20 feet from the property line, in accordance with National Fire Protection buffer zone requirements. All tanks are equipped with an aural (audible) and visual (strobe light) high level alarm system.

The secondary containment (tank farm) consists of a monolithically poured slab and dike wall. The slab is a• thick and the wall is a• thick steel reinforced concrete. The concrete has been sealed with a protective coating *to* render it impermeable. The tanks' secondary containment calculations are shown in Appendix E.

The containment area is designed and operated to remove accumulated liquids through the use of a manually operated pumping system. Accumulated precipitation in the secondary containment system will be removed in a timely basis after detection. A visual inspection *of* the storm water for a sheen and discoloration will be conducted. If no sheen or discoloration is noted, the accumulated precipitation will be discharged from the tank farm to the surface of the facility. If a sheen is noted, the precipitation will be pumped into an onsite storage tank for offsite management. If a solvent spill occurs within the containment dike, the spilled material will be completely removed. If water is present should a spill occur, all of the liquid will be managed as hazardous waste.

The return and fill is located adjacent to the warehouse. The drum washer/dumpsters are hard-piped to the tank and all piping is aboveground. Secondary containment is. provided by reinforced concrete slab and curbs.

3.3.2 Container Storage (40 CFR 264.173)

The slab, curbing, and collection trenches for the container storage areas (CSA) in the warehouse are made of steel reinforced concrete. The concrete floor is sealed with a coating that is compatible with the waste being stored, to render it impervious so as to contain leaks and spills until the collected material is detected and removed. Steel grates cover the trenches to facilitate the movement of containers across them.

Adequate aisle space will be maintained between rows of waste. This will allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of the facility during an emergency. The containers will be kept closed during storage except when wastes are being added to or removed from them. The containers must be handled and stored such that ruptures and leaks do not occur.

The metal shelter and its secondary containment are constructed of sheet steel and it is painted a light color to reflect sunlight. Overhead doors secure the shelter. Secondary containment in the form of a metal pan at the base of the building Is used to contain potential leaks or spills. This container storage area is enclosed, thus preventing run.on from occurring. Spilled or leaked wastes will be removed by using absorbents. The resulting cleanup materials will be drummed and properly disposed of along with other containerized wastes.

3.4 PLANT OPERATIONS - POTENTIAL SPILL AND FIRE SOURCES, ANO CONTROL PROCEDURES (40 CFR 264.31)

Employees must perform their duties in the safest, most efficient manner possible. The facility is equipped to facilitate these activities. Whenever possible, containers will be moved using a handcart, and pallets are typically moved using a forklift or pallet jack. Upon arrival at the Service Center, containers of waste are either added to the spent solvent storage tanks or are placed in a container storage area. Open containers of solvent must not be left unattended. Containers holding hazardous waste will always be closed during storage except if necessary to add or remove wastes.

Below are descriptions of situations that can result in accidents and the precautions taken to prevent their occurrence:

3.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

a. Emptying of drummed solvent into the drum washer/dumpster at the return and fill station - As the containers are emptied into the drum washer, solvent can splash out of the drum washer. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by coated concrete and will contain this type of spill. There is a blind sump in this floor for any splashed/spilled solvent to accumulate in. Any accumulated solvent will be pumped from this sump and into the drum washer for transfer to the waste storage tanks.

b. Filling of drums with solvent product - A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill containers with clean solvent. Leaking fittings, a damaged hose, or carelessness could lead to the discharge of solvent outside of the container. Manual emergency shut-off valves are installed on each hose, should the equipment not function properly. Employee training emphasizes the importance of inspection, maintenance, and reporting of conditions with pollution incident potential.

c. Moving of containers - When a container is moved, a potential exists tor it to tip over. To minimize the potential for spillage of waste, all containers must b maintained in an upright position and remain tightly closed while in storage or in transit

d. Delivery truck transfers - The cargo should be secured in the route vehicle with straps or load locks before transport. Individual containers of waste can tip over or be dropped when being moved on or off a delivery truck. Appropriate material handling equipment will be used as necessary. If a spill does occur. the amount of material in the containers is a quantity that can be collected with absorbents. Any contaminated soil that results will be removed and transported to an approved facility for proper disposal.

3.4.2 Potential Major Spill Sources

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

a. Overfilling of storage tanks - Storage tanks can be overfilled with a resulting discharge of materials. The high level alarm is tested weekly for proper functioning of electrical and mechanical components. Furthe . the tank volume is checked daily before pumping materials into the tank. This will prevent overfilling of the storage tanks.

b. Leaking pipelines - The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

3A.3 Potential Fire Sources (40 CFR 264.176)

The following is a list of fire prevention and minimization measures:

a. All waste and products are kept away from ignitable sources - Personnel must confine smoking and open flames to remote areas, separate from any flammable materials. The solvent handling area and the aboveground storage tanks are separated from the warehouse area to minimize the potential for a fire to spread or injury to personnel. All electrical wiring, switches, and fixtures meet applicable fire safety and electrical construction codes.

b. Ignitable wastes are handled so that they do not

1. Become subject to extreme heat or pressure, fire or explosion, or a violent reaction - The spent parts cleaner solvent is stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or sources that are subject to violent reactions. The tanks are vented and the containers are kept at ambient temperature to minimize the potential for pressure buildup.

2. Produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health - The vapor pressure of parts cleaner solvent is low, 0.2 mm

Hg at 68°F, and it is reactive with reactive metals and strong oxidizers only. Toxic mists, fumes, dusts, or gases will not form in quantities to threaten human health since strong oxidizers are rarely handled at this facility and if so, *they* are only stored for 1O days or less. Solvent vaporization will be minimal under normal working conditions.

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion - See "a" above and "c" below.

4. Damage the structural integrity of the Safety-Kleen facility - The parts cleaner solvent wm not cause deterioration of the tank, drums or other structural components of **the facility.**

c. Adequate aisle space is maintained to allow the unobstructed movement of personnel; fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

d. "No Smoking" signs are posted in areas where ignitable materials are handled or stored.

e. Fire extinguishers must be checked once per month by facility personnel to ensure proper charges, and once per year by a fire extinguisher company.

3A.4 Tank Evaluation and Repair Plan

· The waste material stored in the tank at this facility is parts cleaner solvent, which is compatible with the carbon steel structure. In fact, the parts cleaner solvent is often used as a light hydrocarbon coating to prevent rusting of metal parts. The tanks will be checked for corrosion, leaks, or any damage that might affect the integrity of the storage tanks. If significant corrosion is noted, the tank will be removed or repaired. If the corrosion is significant and localized, the tank will be taken out of service immediately and repaired (e.g., a patch welded over the corroded area).

3.4.5 External Factors [40 CFR 270.14(b)(8)]

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump

switches are located inside the warehouse of the Service Center. The container storage areas are in the warehouse and the metal shelter area which are inaccessible to unauthorized personnel.

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

Strikes - An employee strike would not result in a solvent spill or fire. Operations will cease if a strike occurs.

Power failure - A power failure would not result in a spill or fire. Should a power failure occur, au activities requiring electricity will cease.

Flooding- The site elevation is above the projected 100-year floor plain, therefore a 100-year flood will not affect the facility.

Storms or Cold Weather - Storms and cold weather will have no foreseen effect on the facility.

3.5 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS (40 CFR 264.34)

Internal communication within the facility is accomplished by voice or the available intercom paging system. Telephones will be used to report a spill or fire, and to summon assistance from *local* and state emergency response agencies. Emergency response telephone numbers are posted by each facility telephone. Included in these phone numbers is the 24-Hour Safety-Kleen emergency response coordinator.

SAFETY-KLEEN SYSTEMS, INC.
OKLAHOMA CITY, OKLAHOMA

PERMIT ATTACHMENT 4

CONTINGENCY PLAN

CONTINGENCY PLAN

ABSTRACT

PURPOSE: This plan describes the proper action to be taken by employees during an emergency

RESPONSIBILITIES: The emergency coordinator or alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR: The emergency coordinator and alternate emergency coordinator are designated Safety-Kleen employees who have been trained for these positions.

EMERGENCY NOTIFICATIONS:

Oklahoma City Police Department	911
Oklahoma City Fire Department	911
Integris Health Baptist Medical Center	911 or 405-949-3161
Safety-Kleen 24-Hr Emergency Response	800/468-1760
Oklahoma Department of Environmental Quality	800-522-0206
National Response Center	800/424-8802

4.0 CONTINGENCY PLAN (40 CFR 264 SUBPART D)

Safety-Kleen Systems
7528 Newcastle Road
Oklahoma City, OK 73169

4.1 PURPOSE (40 CFR 264.51)

The Contingency Plan describes the actions to be taken by employees in the event of a spill, fire, or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous waste to the air, soil, surface water, or ground water.

The Contingency Plan is to be carried out immediately whenever there **is a** release of hazardous material which could threaten human health or the environment.

4.2 EMERGENCY COORDINATOR RESPONSIBILITIES (40 CFR 264.55)

The emergency coordinator, or alternate emergency coordinator, is responsible for implementing the Contingency Plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or the alternate emergency coordinator be unavailable.

The emergency coordinator and the alternate emergency coordinator must be familiar with all aspects of this Contingency Plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the Contingency Plan. The emergency coordinator and alternate emergency coordinator's home addresses and telephone numbers, as well as the office telephone number are listed in Appendix F. Also listed in Appendix F, are typical functions of each employee during an emergency. At least one employee will be at the facility, or on call, to respond to an emergency situation at all times.

4.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency, the emergency coordinator (or the alternate when the emergency coordinator is not available) will:

a. Activate the internal facility communication system to notify all facility personnel;
b. Immediately notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number (currently 800/468-1760), which is the Safety-Kleen Incident Notification System;
c. Notify appropriate state or local agencies with designated response roles if necessary; and,

Whenever there is a release, fire, or explosion, the emergency coordinator or alternate must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or, by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator or alternate must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion, (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run off).

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

4.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator or alternate emergency coordinator must contact the state agency and Safety-Kleen Emergency Response Coordinators to report the incident.

The treatment, storage, and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator or alternate emergency coordinator must ensure that, in the affected area(s) of the facility:

a. No substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and
b. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed.

4.2.3 Reporting Responsibilities (40 CFR 264.56)

If the emergency coordinator or alternate determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

a, If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate local authorities (i.e. fire and police).
b. The coordinator must immediately notify the Safety-Kleen Emergency Response Coordinators, Oklahoma Department of Environmental Quality and the National Response Center if necessary. This notification shall include the following:

(1) Name and telephone number of notifier;
(2) Name and address of facility;
(3) Time and type of incident (e.g., release, fire);
(4) Name and quantity of material(s) involved, if known
(5) Extent of injuries, if any; and,
(6) Possible hazards to human health, or the environment outside the facility

Safety-Kleen will notify the appropriate state and local authorities that the facility is back in compliance with Section 4.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date and details of an incident that requires the implementation of the contingency plan. Within 15 days of the incident, Safety-Kleen will submit a written report to Oklahoma DEQ. The report must include:

a. Name, address and telephone number of the owner or operator;
b. Name, address and telephone number of the facility;
c. Date, time and type of incident (e.g. fire, explosion, spill)
d. Name and quantity of material(s) involved;
e. The extent of injuries, if any;
f. An assessment of actual or potential hazards to human health or the environment;
g. Estimated quantity and disposition of recovered material that results from the incident

4.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

a. The person who discovers/causes the spill reports to the emergency coordinator or alternate emergency coordinator;
b. The emergency coordinator or alternate emergency coordinator contacts the Safety-Kleen Emergency Response Coordinators and.
c. Safety-Kleen's Emergency Response Coordinators, will contact an emergency response contractor, if required.

4.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health or need for evacuation
Fire Department	Notify if there is a fire, uncontrolled spill or other imminent danger
Hospital	Notify if there are any injuries
Oklahoma DEQ	Report releases and fires
National Response Center	Report releases

SK-Emergency Response Contractor	Call to assist with remedial action after a release

Arrangements have been made to familiarize the police department, fire department, and local emergency response teams with the layout of the facility, properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have been made to familiarize the local hospital with the types of injuries or illnesses that could result from fires, explosions, or releases at the facility.

4.3 EMERGENCY RESPONSE PROCEDURES (40 CFR 264.56)

Response actions to be taken in specific emergency situations are described in the sections which follow.

4.3.1 Minor Splls

If a spill should occur while pouring spent solvent into a drum washer/dumpster or filling containers with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station. Remedial action will not be necessary. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on a paved area, it must be collected with absorbent material. The sorbents will be collected, drummed, and transported to a licensed hazardous waste management facility for proper processing. Should water be present when a spill occurs, all of the liquid will be treated as hazardous waste, unless otherwise determined, and pumped into the spent solvent storage tank. The secondary containment of the container storage area is emptied using a wetldry vacuum, pump, or absorbent materials. Detergent can be used as needed. All material collected from spill cleanups will be treated as hazardous waste.

b. If the solvent spills on an unpaved area, the free solvent must be collected with absorbent material. The absorbent material and any contaminated soil will be

collected, containerized and transported to a licensed hazardous management facility for proper processing.

If a spill occurs while moving or delivering containers outside of the warehouse, the response actions described above must be followed. Spills inside the warehouse or metal shelter will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors should be opened to improve the ventilation in the confined area (if safe to do so). If ignitable materials are spilled in a non-explosion proof rated area or is flowing into such, insure that sources of ignition (e.g. thermostats or light switches) are left in the same position as at the time of the spill to prevent accidental sparking. Following instructions of the appropriate Material Safety Data Sheet, the worker will enter the area wearing the required personal protective equipment (e.g., gloves, aprons, safety glasses, and respirator), collect the liquid, containerize it and move it to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water.

4.3.2. Major Spills

Any spill that can not be completely remediated using the methods described in Section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material that escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems, and storm sewer systems. Emergency response to this type of spill should be as follows:

a. Assist any injured people;
b. Stop the flow of materials, if possible;
c. Retain, contain, or slow the flow of the material if it cannot be stopped;
d. If material escapes containment efforts, immediately call the local fire department, and report to the emergency coordinator or alternate emergency coordinator and Safety-Kleen's Emergency Response Coordinators.
e. Immediately recover, to the extent possible, the spilled materials to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator or alternate emergency coordinator shall report any

Incident, as soon as possible, to Safety-Kleen's Emergency Response Coordinators using the 24-hour telephone number. As determined by Safety-Kleen's Emergency Response Coordinators an emergency cleanup response contractor will be called. If it is deemed necessary, calls will be made to the National Response Center and Oklahoma DEQ.

The person reporting a spill should be prepared to give his/her name, position, company name, address, and telephone number. The person reporting should also describe the material spilled and if possible, some estimate of the amount, and the contaminant status, and specify any equipment needed.

Spills must be controlled and remediated to the fullest extent possible by Safety-Kleen personnel, even when assistance is required to totally remediate the situation. Safety-Kleen personnel must not take health or safety risks; if there is doubt as to whether a particular action is unsafe, it must be avoided. The source of a release must be stopped by turning off the pumps, closing valves, righting tipped containers or taking other appropriate actions. If the flow cannot be stopped, a berm should be formed by shoveling dirt or absorbent material around the free liquid to hold it in one place or at least direct it to an area where it will do the least amount of damage (e.g. secondary containment areas).

The free liquid can be collected from the ground or affected surface water using absorbents or UL listed pumps. The liquids must be containerized or added to the waste storage tanks - if solvent waste.

4.3.3. Fire Control Procedures

If a small fire occurs, Safety-Kleen personnel must act quickly to put out the fire before it spreads to other parts of the facility, if possible to do so without undue threat to personal safety. If it cannot be extinguished with one fire extinguisher immediately, evacuate the facility and call the fire department.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those that can immediately be extinguished using one fire extinguisher. Any fire that cannot be brought under control immediately, or which has the potential to become uncontrollable warrants implementation of the evacuation plan.

Vapors of parts cleaner solvent exposed to a spark or open flame may flash at temperatures over 105°F. A parts washer solvent fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Attention should then be directed immediately to extinguishing the flame.

Dry cleaning wastes are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (approximately 1200°F). The potential for the materials reaching a decomposition state is minimal, however, Safety-Kleen personnel and local authorities must be aware of the proper response should a fire affect the container storage area. Emergency response should be as follows:

a. Isolate the hazard area and deny entry to unauthorized personnel;
b. Stay upwind, keep out of low areas;
c. Ventilate closed spaces before entering them;
d. Wear positive pressure breathing apparatus and protective clothing;
e. Evacuate a 600-foot radius endangered by the gas.

A fire in the container storage areas can best be extinguished by foam, water fog, or water spray. Parts cleaner solvent and immersion cleaner can generate carbon monoxide and other poisonous gases when exposed to heat. Therefore, it is important to wear positive pressure breathing apparatus and full protective clothing in the affected area. If a fire in or near the areas where these wastes are stored occurs:

a. Isolate the area and deny entry to unauthorized personnel;
b. Stay upwind, keep out of low areas;
c. Wear protective clothing and self-contained breathing apparatus.

A dry chemical, carbon dioxide or foam will best extinguish the fire. Cool the containers with water until well after the fire has been extinguished.

Explosions, structural damage or other hazardous conditions may result from the spread of the fire, therefore, the site must not be re-entered until the fire department has determined that it is safe to do so.

4.4 EVACUATION PLAN

Clearly marked exits are in the warehouses and office areas. Employees are trained to recognize all potential exit routes. The site evacuation plan is shown in Appendix F. When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assembled at the end of the northeast driveway to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation, either from a safe building or from a neighboring facility

4.5 ARRANGEMENTS WITH EMERGENCY RESPONSE CONTRACTORS (40 CFR 264.37)

A list of current, potential emergency response contractors is maintained by Safety-Kleen's Emergency Response Coordinators. These contractors will be contacted to provide emergency assistance during a release and/or cleanup.

Copies of the current Contingency Plan are made available to the applicable emergency response agencies. Safety-Kleen requests that each organization keep the Contingency Plan on file and notify Safety-Kleen if they refuse to enter in an agreement or cannot comply with the procedures outlined within the plan. The agencies are invited to visit the facility to become more familiar with the site and the general location of hazardous material storage.

4.6 IMPLEMENTATION SCHEDULE (40 CFR 264.51)

Any discrepancies or deficiencies found during a routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The Branch General Manager has the overall responsibility for correcting any discrepancies found during the routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

4.7 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN (40 CFR 264.53 & 54)

This plan, and all revisions to the plan, are kept at the facility and are regularly updated throughout the operating life of the facility. This plan and all revisions to the plan are made readily

available to employees working at the facility. The plan will be reviewed and updated, if necessary, whenever:

a. The facility operations are revised to allow new wastes to be stored or treated, or applicable regulations are revised;
b. The list or location of emergency equipment changes;
c. The facility changes in its design, construction, operation and maintenance, or other circumstances in a way that:
    (1) Increases the potential for fires, explosions, or releases of hazardous constituents, or
    (2) Change the response necessary in an emergency;
d. The names, addresses, or phone numbers of emergency coordinators change;
e. The employee assigned to each emergency task changes; or
f. The plan fails when implemented in an emergency.

SAFETY-KLEEN SYSTEMS, INC.
OKLAHOMA CITY, OKLAHOMA

PERMIT ATTACHMENT 5

PERSONNEL TRAINING

PERSONNEL TRAINING

ABSTRACT

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records, and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiar/zing them with emergency procedures, emergency equipment, and emergency systems.

TIME OF TRAINING

Job Title	Prior to Starting Work	On The Job	Annually	When Regulations or Procedures Change
Branch General Manager	X	X	X	X
Branch Administrator		X	X	X
Sales/Service Representatives	X	X	X	X
Warehouse Employees	X	X	X	X

5.0 PERSONNEL TRAINING

5.1 OUTLINE OF TRAINING PROGRAM {40 CFR270.14(b)(12)]

Each employee has received adequate training to operate and maintain the facility safely, and to understand hazards unique to his or her job assignments. Appendix G contains information on Service Center training outlines, and example training record form.

5.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS [40 CFR 264.16(d)]

Environmental compliance and training of branch employees is the responsibility of the Branch General Manager. The corporate regulatory compliance department, in turn, provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for facility personnel. Appendix G contains example job descriptions, example training matrices, and an example training record form. These forms are subject to change and are included as examples only. Many training courses are completed electronically and records will also be maintained electronically.

5.2.1 Branch General Manager

The Branch General Manager is responsible for the business and environmental operations at the Service Center. The branch sales and service representatives, administrators, and warehouse employees report to the Branch General Manager. The Branch General Manager or his/her designee provides the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the Branch General Manager must

a. Keep the facility clean and orderly;
b. Execute, or designate an employee to execute, the daily inspection, keep a written log, and remediate any problems;
c. Know the potential hazards of the material and wastes handled at the site;
d. Identify potential spill and fire sources and be able to execute the Contingency Plan;
e. Inform all employees of their environmental responsibilities;

f. Notify the proper authorities during an emergency, remediate the situation to the best of their abilities, and submit necessary reports with the company;

g. Maintain all environmental records (such as manifests, training records, and spill reports) on file at the facility.

5.3 DESCRIPTION OF THE TRAINING PROGRAM [40 CFR 264.16(a)(1}J

Employee training is accomplished using classroom, electronic (i.e. video, a-Leaming), written, and on-the-job methods. The Training Department prepares a training program for employees and the Service Center personnel provide documentation that the program has been executed.

An employee is trained prior to starting, or as soon as he or she begins working (depending on his or her position) and annually thereafter. The EHS Department ensures that the Branch General Manager or his/her designate has received adequate training to train an branch personnel. Appendix G contains an example outline of the training program, which demonstrates that facility personnel are trained in hazardous waste management procedures.

5.3.1 Training of New Branch General Managers

New Branch General Managers are trained before they begin their ne-u positions. This training occurs on site, on-the-job, in off-site classroom training, electronic (i.e. video, e-Leaming), written, and on-the-job methods. While being trained, a new Branch General Manager reviews all environmental records and learns the recordkeeping requirements. These records include manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates in additional training at the direction of an environmental professional. The training consists of an introduction to environmental law and a review of the Part B permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan. Additional time is spent reviewing past environmental compliance at the Branch General Manager's facility. Regulations unique to the state are discussed as well.

5.3.2 Training of New Branch Administrators

Branch administrators are trained in the proper recordkeeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the Branch General Manager or his/her designee and is completed within six months of starting. The training includes some of the items listed in the Example Training Plan that may be applicable to the branch administrator's job. In addition, the Contingency Plan must be reviewed with the Branch General Manager.

5.3.3 Training of New Sales and Service Representatives

New representatives are introduced to the Part B Permit which includes: Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, etc. A representative may also be trained as a designate for performing the facility inspection. Additional training is in the form of classroom, electronic **(i.e.** video, a-Leaming), written, and on-the-job methods. The Contingency Plan must be reviewed before the Representative formally begins the new position. Items such as those applicable in the Regulatory Training Matrix must be covered within six months of hire.

5.3 A Training of New Material Handlers

A material handler is trained to maintain the Service Center and assist the other branch employees in their tasks. A material handler *may* also be trained as the designate for performing the *daily* inspection. Additional training may be in the form of videotape presentations, classroom, electronic (i.e. video, a-Leaming}, written, and on-the-job methods. The Contingency Plan must be reviewed with the Branch General Manager before the material handler formally begins his/her new position, and annually thereafter. Items such as those listed In the Example Training Plan must be explained within six months of starting.

5.3.5 Annual Training (40 CFR 264.16{c))

On an annual basis, employees are trained using a program prepared and updated by the EHS Department. It includes updates on environmental regulations, an in-depth review of the Contingency Plan, and a review of RCRA inspection criteria.

All Service Center employees will review annually, training items such as those listed in the Example Training Plan outline for branch employees. The annual training may vary from the topics listed *in* the Example Training Plan outline. This review may be in the form of videotapes and classroom instruction, electronic (i.e. video, a-Leaming), written, and on-the-job methods. It will include discussion of the storage facility permit application. The EHS Department issues periodic memoranda on changes in environmental regulations, which all Service Center personnel must read and discuss.

5.4 Training RECORDS [40 CFR 264.1&(d)}

All employee regulatory training must be documented. Records of current employees will be kept at the facility until closure. Training documentation will include, at a minimum, the required information listed on the example record forms listed in Appendix G. Some training documentation will be maintained electronically.

SAFETY-KLEEN SYSTEMS, INC.
OKLAHOMA CITY, OKLAHOMA

PERMIT ATTACHMENT 6

CLOSURE PLAN

AND

COST ESTIMATES

CLOSURE PLAN

ABSTRACT

LOCATION ADDRESS: Safety-Kleen Systems, Inc.
7528 Newcastle Road
Oklahoma City, OK 73169

U.S. EPA ID. No: OKD 980 878 474

WASTE UNITS TO UNDERGOCLOSURE:

a. Tank Storage: One 16,800 gallon aboveground storage tank for spent parts washer solution and spent aqueous solution.
b. Container Storage: One 500 square foot area for container storage in the warehouse with a storage capacity of 1728 gallons.
c. Return and Fill Station: The location of this unit is shown on the Site Plan and consists of two drum washers with a combined capacity of 750 gallons.
d. Metal Shelter: The location of this structure is shown on the Site Plan. It has a storage capacity of 2,184 gallons.

6.0 CLOSURE PLAN (40 CFR 270.14(b)(13) and 40 CFR 264 SUBPART G]

6.1 PURPOSE

The Oklahoma City Service Center operates as a storage facility for hazardous wastes and must be closed in accordance with the closure requirements of 40 CFR 264, Subpart G. Closure of the facility will be carried out in accordance with the steps in this plan. Table 1contains an estimated cost. The closure cost will be updated at the beginning of each calendar **year.**
Safety-Kleen will remediate all hazardous wastes from the facility to a level that is determined to be protective of human health and the environment Hazardous wastes will be stored in appropriate containers and not in waste piles or landfills, therefore, no post closure maintenance is planned. Upon completion of closure activities, the need for post-closure maintenance will be minimized or eliminated.

6.2 ABOVEGROUND TANKS AND ASSOCIATED PIPING [40 CFR 264.197(a)]

To safely clean and decommission the aboveground storage tanks:

a. Remove the remaining material from the tank and return the materials to the Recycle Center for reclamation.
b. Provide access to the tank
c. Rinse, scrape and squeegee the tank interior, removing all residual waste material and rinsate
d. Disconnect and decontaminate all appurtenant piping and pumping equipment
e. Remove tank and appurtenant equipment and reuse or sell as scrap
f. Clean the concrete diking and stab. Alternately, Safety-Kleen may want to leave the tanks and concrete diking and slab in place following closure as a RCRA permitted facility
g. If necessary, backfill all excavations with clean fill materials
h. Transport and dispose of all waste material generated during the project

6.2.1 Removal of Waste Material and Opening of the Tank

To safely open the tank and remove the waste material:

a. Pump the waste materials out of the tank using a pump, vacuum truck, or similar equipment and transport to a Safety-Kleen Recycle Center or other properly permitted facility for reclamation.

b. To gain access to aboveground tanks, use the man way at the top of the tank, or on the side of the tank. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the man way. Special care will be exercised to minimize spark generation when working on the tank.

c. Prior to entering the tank, personnel will have appropriate respiratory equipment and protective clothing. Once the tanks have been opened, they must be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

6.2.1 Removal of Residual Waste and Cleaning of Tank

To safely remove the residual waste and clean the tank:

a Before removing any residual waste from the tank, all piping and appurtenant equipment associated with the parts washer solvent tank will be flushed with a detergent solution.

b. The method used to remove residual waste from the tank will depend on the physical properties and quantities of the material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible.

c. Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high-pressure wash system using a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be returned to a Recycle Center for reclamation. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

d. Storage tanks are considered confined spaces per OSHA. Confined space entry requires special procedures. These procedures will be specified in the site health and safety plan prepared by the independent engineer.

6.2.3 Removal of the Tank

To safely remove the tank:

a. Disconnect and decontaminate all appurtenant piping and pumping equipment.

b. The vessel shall be removed and reused or cut up and sold as scrap. The tanks and piping unfit for reuse shall be removed and disposed of at a properly permitted landfill or recycled as scrap. Verification of destruction will be provided. The rinsate will be collected and sent to a Safety-Kleen Recycle Center or properly permitted treatment or disposal facility for treatment.

c. The concrete diking will be cleaned with a high-pressure water detergent solution. A sample of the final rinse water will be collected and analyzed for volatile organic compounds to confirm the cleanliness of the diking. Soil samples beneath the concrete will be collected only if significant, fully-penetrating, unsealed cracks are evident In the concrete slab. All soil samples will be analyzed for mineral spirits, volatile organic compounds, and characteristic for toxicity due to cadmium, chromium, and lead using TCLP protocol. If contamination is indicated, a soil study will be done to determine the extent. Over excavation of the soil or other approved method will be performed to eliminate the contamination. Soil samples will be collected and analyzed after cleanup to ins re decontamination has been achieved.

d. Inspect the excavation and backfill with clean fill materials and grade to ground level.

6.3 CONTAINER STORAGE AREA IN WAREHOUSE (CSA) (40 CFR 264.178)

The CSA is used for the storage of containers that may contain spent parts washer solvent, aqueous parts cleaner waste, spent immersion cleaner, dry cleaning waste, dumpster sediment, paint waste, used antifreeze, photographic imaging waste, spent industrial fluids, used oil and various transfer wastes. At closure, the containers will be removed and transported to an appropriate licensed hazardous waste management facility after proper packaging, labeling, and manifesting.

The concrete floor and spill containment sump will be cleaned with a detergent solution. The final rinsate will be analyzed for volatile organic compounds. All rinsate wastes generated in the container storage area will be transported to a licensed hazardous waste management facility.

6.4 CONTAINER STORAGE AREA IN METAL SHELTER (40 CFR 264.178)

The metal shelter is used for the storage of containers that may contain spent parts washer solvent, aqueous parts cleaner waste, spent immersion cleaner, dry cleaning waste, dumpster sediment, paint waste, used antifreeze, photographic imaging waste, spent industrial fluids, used oil and various transfer wastes. At closure, the containers will be removed and transported to an appropriate licensed hazardous waste management facility after proper packaging, labeling, and manifesting.

The shelter wilt be thoroughly cleaned with a detergent solution. The final rinsate will be analyzed for volatile organic compounds. Rinsing and washing will continue until these levels are found to be below detection limits. All rinsate wastes generated in the container storage area will be transported to a licensed hazardous waste management facility.

The shelter will be reused by the Company or recycled as scrap metal.

6.5 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the spent parts cleaner solvent and spent aqueous solutions to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, any sediment in the drum washers will be removed and containerized, labeled, and manifested for proper treatment and/or disposal through a Safety-Kleen recycle center.

The drum washers and the dock area will be thoroughly rinsed with a detergent solution. The rinsate will be discharged through the appurtenant piping system into the storage tanks, will be subjected to a separate closure procedure as described earlier. The final rinsate must be analyzed for volatile organic compounds. The clean drum washers and dock structure may be reused by Safety-Kleen or disposed at a properly permitted landfill or used as scrap metal.

6.6 DECONTAMINATION OF CLEANUP EQUIPMENT (40 CFR 264.116)

All equipment used for the closure of the facility will be properly decontaminated prior to its reuse. Small equipment (such as mops, rags, etc.) and their residue that cannot be reused will be transported to a licensed hazardous waste management facility.

6.7 FACILITY CLOSURE SCHEDULE AND CERTIFICATION (40 CFR 264.113 & 115)

Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The Oklahoma Department of Environmental Quality may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

a. The facility has the capacity to receive additional wastes;
b. There is a likelihood that an entity other than Safety-Kleen will recommence operation of the site; and/or
c. Closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

When closure is completed, Safety-Kleen shall submit to the DEQ, certification , both by the operator and by an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan.

CLOSURE SCHEDULE

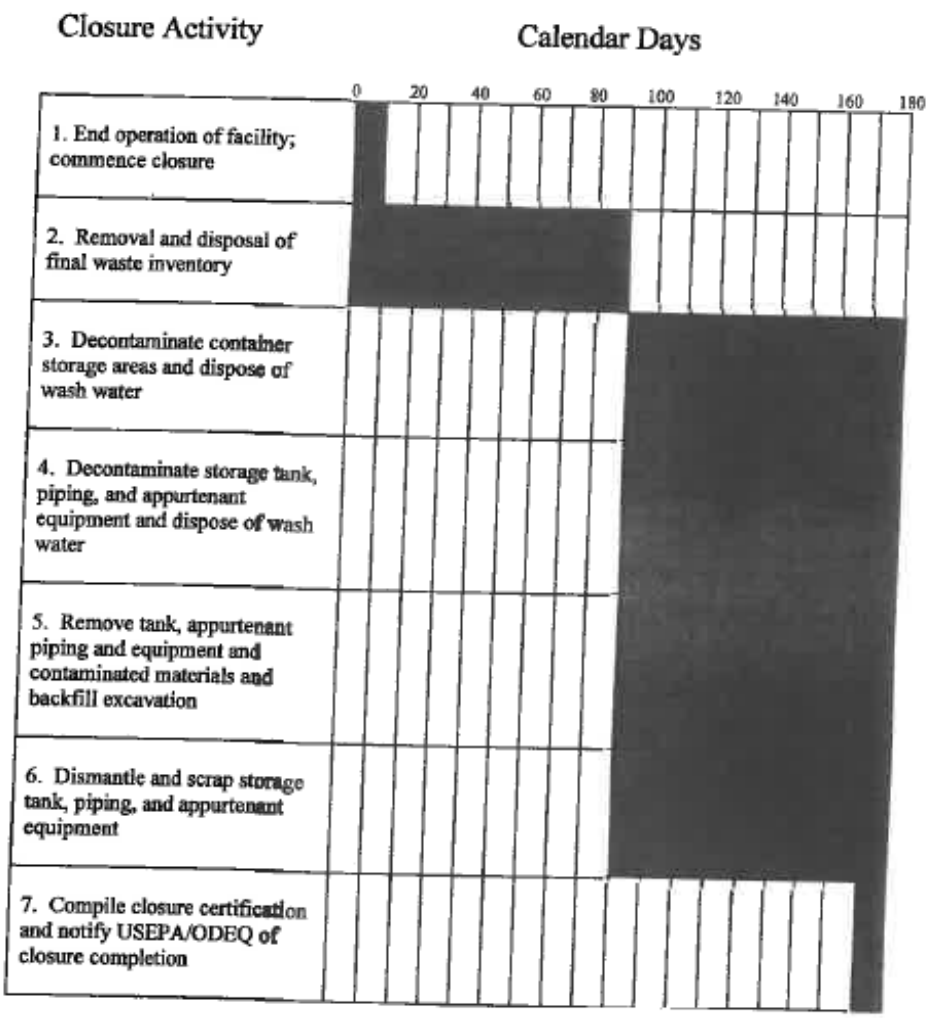

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Branch Service Center, (Oklahoma City, OK

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Branch Service Center, [Oklahoma City, OK] 11/28/2023

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal
1. INVENTORY REMOVAL				
Assumptions				
- One waste mineral spirits tanks is full (16,800 gallons)				
- Maximum capacity of 750 gallons in R/F drum washers. 750 gallons added to waste mineral spirits tank quantity				
- One CSA will be closed with maximum capacity of 1,795 gallons = 32 - 55 gallon drums.				
- One Flammable Materials Storage Shelter with maximum capacity of 2184 gallons = 40 -55-gallon drums				
Subcontractor Costs				
- Transfer tank contents to tankers				
Tank Capacity			17550	
Work Rate to Unload Tank Capacity			0.0003	$0
Total Hours to Unload			5.3	
Labor and equipment to unload (PPE Level D)	Labor/equipment	$175.95	5.3	$926
- Transport waste mineral spirits to a TSD for treatment/disposal				
Assumes 3 tanker trailers required to remove 16,000 gallons (6,000 gallons max each load)				
Estimated cost per mile =$5.64/mile				
Estimated mileage = 300 miles	Transport 3 trailers x 300 miles	$5.64	900	$5,076
Estimated disposal/treatment cost (per gallon - low cost based on suitability for fuel)	TSD @$0.45/gallon	$0.450	17550	$7,898
- Transfer drums from CSA to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	$3.57	32	$114
- Transfer drums from Flammable Materials Storage Shed to trucks with forklift				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	$3.57	40	$143
- Transport drums to TSD for Treatment/Disposal				
Total Number of Drums			72	
Total Number of Trucks Required to Transport Drums (84 per truck max)			1	
Estimated cost per mile =$5.64/mile				
Estimated mileage = 300 miles	Transport 1 trailer(s) x 300 miles	$5.64	300	$1,692
Estimated disposal/treatment cost (per drum - low cost based on suitability for fuel)	TSD @ $90/drum	$90	72	$6,480
Activity 1. Subtotal				$22,329
2. STORAGE TANK DECONTAMINATION				
Assumptions:				
- The tank, piping and appurtenant equipment are decontaminated and remain in place				
- Rinsate sampling necessary because the tank will remain in place. Assumes 1 rinsate sample per tank.				
- Includes decontamination of the containment area				
- Assumes containment area to remain in place following decontamination				
- Assumes 1 rinsate sample required to leave containment in place and assumes 2 soil samples required				
Prime Contractor Costs				
-Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Samples (1 per tank and 1 per containment)				
Work Rate for Sampling (per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	$91.88	1.00	$92
- Drilling for Soil Samples (2.5 in boring to 1 ft each)				
Work Rate for Drilling (per foot)			0.3050	
Number of Feet (subslab sample depth = 1 foot each)			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	$146.29	0.61	$89
- Collect 2 Soil Samples				
Work Rate for Sampling (per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	$91.88	1.00	$92
Subcontractor Costs				
- Decontaminate one waste AST, piping and appurtenant equipment				
Work Rate to Pressure Wash 1 sq ft			0.0405	$0
Area of Tanks to be decontaminated			920.0	
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	$97.23	37	$3,623
- Decontaminate Tank Containment Area				
Work Rate to Pressure Wash 1 sq ft			0.0405	
Total Area of Containment (includes walls and floor)			1564	
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	$65.77	63	$4,166
Laboratory Subcontractor Costs				
- Analyze rinsate sample(s) from tank and containment area for VOCs	VOCs @ $189/sample			
	Total per sample cost	$189	2	$378

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal
- Analyze soil sample(s) from containment area for VOCs, TPH and TCLP metals	VOCs @ $189/sample TPH @ $61/sample 8 RCRA TCLP Metals @ $569/sample Total per sample cost	$819	2	$1,638
Activity 2. Subtotal				$10,078

3. DECONTAMINATE THE RETURN/FILL STATION

Assumptions:
- Decontamination shall consist of washing with detergent/water solution and rinsing with high-pressure spray
- Return/Fill structure and dock area will remain in place
- Rinsate sampling required from each drum washer to remain in place or sent offsite for reuse (VOCs only)
- Square footage used for decontamination includes containment, dock and drum washer units

Prime Contractor Costs
-Costs for oversight and engineers inspection included in Closure Certification Activity below

- Collect Rinsate Samples (1 per drum washer)				
Work Rate for Sampling (per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	$91.88	1.00	$92

Subcontractor Costs

- Decontaminate waste AST, piping and appurtenant equipment				
Work Rate to Pressure Wash 1 sq ft			0.0405	$0
Area of Tanks to be decontaminated			1000.0	
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	$97.23	41	$3,938

Laboratory Subcontractor Costs

- Analyze rinsate sample(s) from drum washers for VOCs	VOCs @ $189/sample Total per sample cost	$189	2	$378
Activity 3. Subtotal				$4,408

4. DECONTAMINATE CONTAINER STORAGE AREA

Assumptions:
- One CSA with total capacity of 1,795 gallons/500 sq ft
- Decontamination shall consist of washing with a detergent water solution and rinsing with a high-pressure spray
- CSA remains in-place following closure
- Decontamination of CSA includes floor, curbing and containment trenches
- Any ramps leading into the storage areas (if present) will also be decontaminated.
- Assumes 1 rinsate sample from each CSA required.

Prime Contractor Costs
-Costs for oversight and engineers inspection included in Closure Certification Activity below

- Collect Rinsate Samples (1 per CSA)				
Work Rate for Sampling (per sample)			0.5000	
Number of Samples			1	

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal
Labor and equipment per work hour (PPE Level D)	Labor/equipment	$91.88	0.50	$46
Subcontractor Costs				
- Decontaminate CSA(s)				
Work Rate to Pressure Wash 1 sq ft			0.0405	$0
Total Area of Permitted CSA(s) to be decontaminated			500.0	
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	$65.77	20	$1,332
Laboratory Subcontractor Costs				
- Analyze 1 rinsate sample(s) from each CSA for VOCs	VOCs @ $189/sample			
	Total per sample cost	$189	2	$378
	Activity 4. Subtotal			$1,756

5. DECONTAMINATE THE FLAMMABLE STORAGE SHELTER

Assumptions:
- Decontamination shall consist of washing with detergent/water solution and rinsing with high-pressure spray
- Flammable Materials structure and dock area will remain in place
- Assumes 1 rinsate sample required to leave in place
- Square footage used for decontamination includes containment

Prime Contractor Costs				
-Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Samples (1 per Flam Shed)				
Work Rate for Sampling (per sample)			0.5000	
Number of Samples			1	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	$91.88	0.50	$46
Subcontractor Costs				
- Decontaminate structure, grating and containment				
Work Rate to Pressure Wash 1 sq ft			0.0405	$0
Total Area of Permitted Flam Shed to be decontaminated			800.0	
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	$65.77	32	$2,131
Laboratory Subcontractor Costs				
- Analyze 1 rinsate sample(s) from each shelter for VOCs	VOCs @ $189/sample			
	Total per sample cost	$189	1	$189
	Activity 5. Subtotal			$2,366

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Branch Service Center, [Oklahoma City, OK] 11/28/2023

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal
6. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				
Assumptions:				
- Amount of decon wash water generated derived from previous closure experience. Quantity based on approximately 0.8 gal/ sq ft for tank systems and 0.1 gal/sq ft for containment area floors				
- 500 gallons wash water generated from decontamination of waste tanks (approximately 500 gallons per tank, including residual sludge) + 250 gallons from the containment = 14 drums				
- 450 gallons wash water generated from decontamination of the return/fill structure, and 250 gallons for the containment = 700 gallons = 13 drums				
- 250 gallons of wash water generated from decontamination of CSAs (250 gallons per CSA) = 5 drums				
- 480 gallons of wash water generated from decontamination of Flammable Materials Storage Shelter = 9 drums				
- PPE, plastic sheeting, consumables, debris contained in 5 drums				
- Purchase 55-gallon drums	Drums @ $83 each	$83	46	$4,200
Subcontractor Costs				
- Transfer drums from CSA to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	$3.57	46	$164
- Transport drums to TSD for Treatment/Disposal				
Assumes 1 truck to transport 46 drums (84 per truck max)				
Estimated cost per mile =$5.64/mile				
Estimated mileage = 300 miles	Transport 1 trailer x 300 miles	$5.64	300	$1,692
Estimated disposal/treatment cost (per drum - low cost based on lack of hazardous constituents)	TSD @ $90/drum	$90	41	$3,690
Estimated disposal/treatment cost for PPE drums (assumed haz to landfill)	TSD (based on ETC rate)	$250	5	$1,250
	Activity 6. Subtotal			$10,996
7. CLOSURE CERTIFICATION				
Assumptions:				
- Cost Pro Unit Rate per unit to be closed is $4,118				
- Unit rate includes engineer inspection and decontamination oversight of each unit				
Prime Contractor Costs				
- Oversee and certify closure per unit times number of units	Project Manager/Engineer	$4,118	5	$20,590
	Activity 7. Subtotal			$20,590

COST ESTIMATE ACTIVITIES SUMMARY	
1. INVENTORY REMOVAL	$22,329
2. STORAGE TANK DECONTAMINATION	$10,078
3. DECONTAMINATE THE RETURN/FILL STATION	$4,408
4. DECONTAMINATE CONTAINER STORAGE AREA	$1,756
5. DECONTAMINATE THE FLAMMABLE STORAGE SHELTER	$2,366
6. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES	$10,996
7. CLOSURE CERTIFICATION	$20,590
CLOSURE COST ESTIMATE	$72,522
TOTAL WITH INFLATION ADDED FROM 2010 TO CURRENT YEAR (updated for inflation from the latest version of CostPro (6.0) in 2009)	$92,633
CONTINGENCY (20%)	$18,527
TOTAL CLOSURE COST ESTIMATE WITH CONTINGENCY	$111,159

Notes:
- All unit rates obtained from Cost Pro version 6.0 and includes the following:
  - Transportation @ $5.64/mile and 300 mile trip
  -Disposal for bulk liquids $0.45/gallon based on suitability of waste mineral spirits as fuel
  -Disposal for CSA liquids $90/drum based on suitability of drummed waste streams as fuel

Table 1. Closure Cost Estimate Worksheet, Safety-Kleen Branch Service Center, [Oklahoma City, OK] 11/28/2023

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal
- Disposal of decon wash water $90/drum based on lack of hazardous constituents in waste (soapy water)				
-Subcontractor Decontamination Rate for tanks and return/fill based on PPE Level C				
-Subcontractor decontamination rates for CSAs and Flam Shed (if applicable) based on PPE Level D				
-Prime Contractor Rates based on hourly rate for rinsate sampling, drilling and soil sample collection				
-Lab subcontractor rates for analysis of rinsate and soil samples acquired from lookup tables				
-Closure Certification Activity includes prime contractor oversight, PE integrity inspections and reporting				

Add Inflation factors from 2010 to most recent (updated for inflation from the latest version of CostPro

2010	1.022	$74,117.58
2011	1.012	$75,006.99
2012	1.01	$75,757.06
2013	1.021	$77,347.96
2014	1.018	$78,740.22
2015	1.014	$79,842.58
2016	1.01	$80,641.01
2017	1.013	$81,689.34
2018	1.018	$83,159.75
2019	1.022	$84,989.27
2020	1	$84,989.27
2021	1.046	$88,898.77
2022	1.042	$92,632.52

(6.0) in 2009)

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

Clean Harbors Environmental Services, Inc.
610 131st Place
Hammond, IN 46327
219-746-5050
800.282.0058
www.cleanharbors.com

VIA FEDERAL EXPRESS TRK #773907022991

October 30, 2023

Ms. Carol Bartlett, Environmental Programs Specialist
Land Protection Division
Oklahoma Department of Environmental Quality
707 North Robinson
Oklahoma City, OK 73102

RE: Hazardous Waste Facility Liability Insurance
Clean Harbors Lone Mountain LLC, (Waynoka, OK) – EPA ID No. OKD065438376
Clean Harbors Lone Mountain LLC (Avard, OK) – EPA ID No. OK0000070136
Tulsa Disposal LLC – EPA ID No. OKD000632737
Safety-Kleen Systems, Inc. – multiple sites

Dear Ms. Bartlett:

Please find enclosed four (4) original signed Hazardous Waste Facility Certificates of Liability Insurance issued by Great American Insurance Company. Three (3) certificates are for the three Clean Harbors facilities referenced above while the fourth certificate covers all of the Safety-Kleen Systems, Inc. facilities located in Oklahoma. The policy number is PRE E603235 03 and the policy period is November 1, 2023 – November 1, 2024.

A signed duplicate original of the policy will be made available in 30-60 days and submitted upon a request from the Oklahoma DEQ.

If you have any questions regarding this submittal feel free to contact me at 219-746-5050 or Harvey.Pamela@cleanharbors.com.

Sincerely,

Pamela K. Harvey, CHMM
Sr. Manager Environmental Compliance

Enclosures

GREAT AMERICAN INSURANCE GROUP
Administrative Offices
301 E. 4th Street
Cincinnati, OH 45202
Tel: 1-513-369-5000

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Great American Insurance Company, the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Clean Harbors, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID#OKD 065438376 Clean Harbors Lone Mountain, LLC 40355 S. County Road 236, Waynoka, OK 73860, for sudden and nonsudden accidental occurrences. The limits of liability are $5,000,000 each occurrence, and $10,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 032 issued on November 1, 2023. The effective date of said policy is November 1, 2023.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.

   (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

   (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

   (c) Whenever requested by a Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director.

   (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Heather Boyd

(Signature of Authorized Representative of Insurer)

Date: 11/1/2023

Heather Boyd, Divisional/Subsidiary Vice President, Environmental Division
Authorized Representative of :

Great American Insurance Company
31 St. James Ave., Suite 830
Boston, MA 02116

GREAT AMERICAN INSURANCE GROUP
Administrative Offices
301 E. 4th Street
Cincinnati, Oh 45202
Tel: 1-513-369-5000

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Great American Insurance Company, the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Clean Harbors, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID#OK 0000070136 Clean Harbors Lone Mountain, LLC, ¼ mile East of Avard on County Road 76-22c, Avard, OK 73717, for sudden and nonsudden accidental occurrences. The limits of liability are $5,000,000 each occurrence, and $10,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 03 issued on November 1, 2023. The effective date of said policy is November 1, 2023.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.

   (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

   (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

   (c) Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director.

   (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

(Signature of Authorized Representative of Insurer) Date: 11/1/2023

Heather Boyd, Divisional/Subsidiary Vice President, Environmental Division
Authorized Representative of Great American Insurance Company
31 St. James Ave., Suite 830
Boston, MA 02116

GREAT AMERICAN INSURANCE GROUP
Administrative Offices
301 E. 4th Street
Cincinnati, Oh 45202
Tel: 1-513-369-5000

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Great American Insurance Company, the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Clean Harbors, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID#OKD000632737 Tulsa Disposal, LLC 5354 W 46th Street South, Tulsa, OK 74107, for sudden and nonsudden accidental occurrences. The limits of liability are $5,000,000 each occurrence, and $10,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 03 issued on November 1, 2023. The effective date of said policy is November 1, 2023.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.

   (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

   (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

   (c) Whenever requested by a Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director.

   (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Heather Boyd
(Signature of Authorized Representative of Insurer)

Date: 11/1/2023

Heather Boyd, Divisional/Subsidiary Vice President, Environmental Division
Authorized Representative of:

Great American Insurance Company
31 St. James Ave., Suite 830
Boston, MA 02116

GREAT AMERICAN INSURANCE GROUP
Administrative Offices
301 E. 4th Street
Cincinnati, Oh 45202
Tel: 1-513-369-5000

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Great American Insurance Company, the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Safety-Kleen Systems, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID# SEE ATTACHED LIST for sudden accidental occurrences. The limits of liability are $2,000,000 each occurrence, and $2,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 03 issued on November 1, 2023. The effective date of said policy is November 1, 2023.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.

   (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

   (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

   (c) Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director.

   (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

(Signature of Authorized Representative of Insurer) Date: 11/1/2023

Heather Boyd, Divisional/Assistant Vice President, Environmental Division
Authorized Representative of:

Great American Insurance Company
31 St. James Ave., Suite 830
Boston, MA 02116

GREAT AMERICAN INSURANCE GROUP
Administrative Offices
301 E. 4th Street
Cincinnati, Oh 45202
Tel: 1-513-369-5000

SAFETY-KLEEN SYSTEMS, INC. LOCATIONS

STATE OF OKLAHOMA

7528 New Castle Road Oklahoma City, OK 73169	OKD980878474
26 N.E. 9th Street Oklahoma City, OK 73104	OKD018775469
8800 SW 8th Oklahoma City, OK 73128	OKD987086774
5550 E. Channel Road Port of Catoosa, OK 74015	OKD982558207
16319 E. Marshall Street Tulsa, OK 74116	OKD000763821

CERTIFICATE OF INSURANCE FOR CLOSURE AND/OR POST-CLOSURE CARE

safety-kleen®
PROTECTION·CHOICES·PEOPLE
MAKE GREEN WORK®

VIA FEDERAL EXPRESS TRK #772829843184

July 24, 2023

Ms. Carol Bartlett, Environmental Programs Specialist
Land Protection Division
Oklahoma Department of Environmental Quality
707 North Robinson Street
Oklahoma City, OK 73102

RE: Financial Assurance Insurance Policy Renewal and Annual Inflation Increase
Safety-Kleen Systems, Inc.

7528 New Castle Road, Oklahoma City	EPA ID No. OKD980878474
8800 SW 8th Street, Oklahoma City	EPA ID No. OKD987086774
16319 E. Marshall Street, Tulsa	EPA ID No. OKD000763821

Dear Ms. Bartlett:

Please find enclosed three (3) original signed Certificates of Insurance for Closure and/or Post Closure Care issued by Great American Insurance Company. The renewed policy number is CPC E601049 0**3** and the policy is effective July 31, 2023 through July 31, 2024. In addition, the closure cost estimates have been increased for annual inflation.

The increases were calculated by multiplying the existing 2022 closure cost estimate by the annual inflation factor for Gross National Product 1.0698. This inflation factor was found on the DEQ website under the Solid Waste Annual inflation link (copy attached):
https://www.deq.ok.gov/land-protection-division/waste-management/solid-waste/

New Castle Road (Closure):	$102,294 x 1.0698 = $109,455
8th Street (Closure):	$150,031 x 1.0698 = $160,533
Tulsa (Closure):	$149,215 x 1.0698 = $159,660

If you have any questions regarding this submittal or require any additional information, please contact me at 219-746-5050 or at Harvey.Pamela@cleanharbors.com.

Sincerely,

Pamela K. Harvey, CHMM
Sr. Manager Environmental Compliance

Enclosures

GREAT AMERICAN INSURANCE GROUP
Environmental Division

397 Eagleview Blvd, Suite 100
Exton, PA 19341
888.828.4320 ph

CERTIFICATE OF INSURANCE FOR CLOSURE AND/OR POST-CLOSURE CARE

Name and Address of Insurer (herein called the "Insurer"):

Great American Insurance Company
301 E. 4th Street
Cincinnati, OH 45202

Name and Address of Insured, (herein called the "Insured"):

Clean Harbors, Inc.
42 Longwater Drive
Norwell, Massachusetts 02061

FACILITIES COVERED:

Name:	Safety-Kleen Systems, Inc.
Address:	7528 New Castle Road Oklahoma City, OK 73169
EPA ID Number:	OKD 980 878 474
Closure:	$109,455
Face Amount:	$429,648
Policy Number:	CPC E601049 03
Effective Date:	July 31, 2023

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d) as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ), the Insurer agrees to furnish to the DEQ Executive Director a duplicate original of the policy listed above, including all endorsements thereon.

GREAT AMERICAN INSURANCE GROUP
Environmental Division

397 Eagleview Blvd, Suite 100
Exton, PA 19341
888.828.4320 ph

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e), United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulations were constituted on the date shown immediately below.

(Authorized signature for Insurer)

Rick Ringenwald
(Name of person signing)

Divisional Vice President, Executive Underwriter
(Title of person signing)

(Signature of witness or notary)

7/11/2023
(Date)

SEAL:

Commonwealth of Pennsylvania - Notary Seal
Christal Dove, Notary Public
Chester County
My commission expires September 29, 2026
Commission number 1425572
Member, Pennsylvania Association of Notaries

GREAT AMERICAN INSURANCE GROUP
Environmental Division

397 Eagleview Blvd, Suite 100
Exton, PA 19341
888.828.4320 ph

CERTIFICATE OF INSURANCE FOR CLOSURE AND/OR POST-CLOSURE CARE

Name and Address of Insurer (herein called the "Insurer"):

Great American Insurance Company
301 E. 4th Street
Cincinnati, OH 45202

Name and Address of Insured, (herein called the "Insured"):

Clean Harbors, Inc.
42 Longwater Drive
Norwell, Massachusetts 02061

FACILITIES COVERED:

Name:	Safety-Kleen Systems, Inc.
Address:	8800 SW 8th Street Oklahoma City, OK 73128
EPA ID Number:	OKD 987 086 774
Closure:	$160,533
Face Amount:	$429,648
Policy Number:	CPC E601049 03
Effective Date:	July 31, 2023

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

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(Name of person signing)

Divisional Vice President, Executive Underwriter
(Title of person signing)

Christal Dove
(Signature of witness or notary)

7/14/2023
(Date)

SEAL:

Commonwealth of Pennsylvania - Notary Seal
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Chester County
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Clean Harbors, Inc.
42 Longwater Drive
Norwell, Massachusetts 02061

FACILITIES COVERED:

Name:	Safety-Kleen Systems, Inc.
Address:	16319 E. Marshall St. Tulsa, OK 74116
EPA ID Number:	OKD 000 763 821
Closure:	$159,660
Face Amount:	$429,648
Policy Number:	CPC E601049 03
Effective Date:	July 31, 2023

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Divisional Vice President, Executive Underwriter
(Title of person signing)

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7/14/2023
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The following charts identify the annual inflation adjustments to be applied to solid waste disposal facility closure and post-closure cost estimates.

IMPLICIT PRICE DEFLATOR
GROSS DOMESTIC PRODUCT
(Updated January 31st of each year)

Year			Inflation
1998	1997 IPD = 101.95	1996 IPD = 100.00	1.95%
1999	1998 IPD = 103.22	1997 IPD = 101.95	1.25%
2000	1999 IPD = 104.77	1998 IPD = 103.22	1.50%
2001	2000 IPD = 106.92	1999 IPD = 104.77	2.05%
2002	2001 IPD = 109.23	2000 IPD = 106.92	2.16%
2003	2002 IPD = 110.66	2001 IPD = 109.23	1.31%
2004[1]	2003 IPD = 105.643	2002 IPD = 103.945	1.63%
2005	2004 IPD = 108.220	2003 IPD = 105.643	2.44%
2006	2005 IPD = 112.113	2004 IPD = 108.220	3.60%
2007	2006 IPD = 116.034	2005 IPD = 112.737	2.93 %
2008	2007 IPD = 119.674	2006 IPD = 116.567	2.66 %
2009	2008 IPD = 122.357	2007 IPD = 119.816	2.12%
2010	2009 IPD = 109.777	2008 IPD = 108.483	1.19%
2011	2010 IPD = 110.654	2009 IPD = 109.615	0.95%
2012	2011 IPD = 113.327	2010 IPD = 110.992	2.10%
2013	2012 IPD = 115.360	2011 IPD = 113.359	1.76%
2014	2013 IPD = 106.570	2012 IPD = 105.002	1.49%
2015	2014 IPD = 108.272	2013 IPD = 106.733	1.44%
2016	2015 IPD = 109.767	2014 IPD = 108.686	0.99%
2017	2016 IPD = 111.446	2015 IPD = 109.998	1.32%
2018	2017 IPD = 113.422	2016 IPD = 111.416	1.02%
2019	2018 IPD = 110.389	2017 IPD = 107.948	2.26%
2020	2019 IPD = 112.355	2018 IPD = 110.420	1.75%
2021	2020 IPD = 113.626	2019 IPD = 112.265	1.21%
2022	2021 IPD = 118.357	2020 IPD = 113.648	4.14 %
2023	2022 IPD = 127.192	2021 IPD = 118.895	6.98 %

IMPLICIT PRICE DEFLATOR
GROSS NATIONAL PRODUCT
(Updated March 31st of each year)

Year			Inflation
1998	1997 IPD = 101.93	1996 IPD = 100.00	1.93%
1999	1998 IPD = 103.19	1997 IPD = 101.93	1.24%
2000	1999 IPD = 104.77	1998 IPD = 103.19	1.53%
2001	2000 IPD = 106.89	1999 IPD = 104.73	2.06%
2002	2001 IPD = 109.21	2000 IPD = 106.89	2.17%
2003	2002 IPD = 110.63	2001 IPD = 109.21	1.30%
2004[1]	2003 IPD = 105.671	2002 IPD = 103.932	1.67%
2005	2004 IPD = 109.091	2003 IPD =106.299	2.63%
2006	2005 IPD =112.129	2004 IPD = 109.091	2.78%
2007	2006 IPD = 116.036	2005 IPD = 112.726	2.94%
2008	2007 IPD = 119.656	2006 IPD = 116.558	2.66 %
2009	2008 IPD = 122.407	2007 IPD = 119.813	2.17%
2010	2009 IPD = 109.764	2008 IPD = 108.486	1.18%
2011	2010 IPD = 110.654	2009 IPD = 109.609	0.95%
2012	2011 IPD = 113.347	2010 IPD = 110.971	2.14%
2013	2012 IPD = 115.387	2011 IPD = 113.353	1.79%
2014	2013 IPD = 106.710	2012 IPD = 105.126	1.51%
2015	2014 IPD = 108.407	2013 IPD = 106.854	1.45%
2016	2015 IPD = 109.868	2014 IPD = 108.800	0.98%
2017	2016 IPD = 111.528	2015 IPD = 110.090	1.31%
2018	2017 IPD = 113.500	2016 IPD = 111.509	1.79 %
2019	2018 IPD = 110.308	2017 IPD = 107.903	2.23%
2020	2019 IPD = 112.257	2018 IPD = 110.320	1.76%
2021	2020 IPD = 113.586	2019 IPD = 112.227	1.21%
2022	2021 IPD = 118.349	2020 IPD = 113.636	4.15%
2023	2022 IPD = 127.194	2021 IPD = 118.871	7.00%

Information for tables obtained from Bureau of Economic Analysis
Table 1.1.9 at
https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#

[1]In 2004, the Bureau of Economic Analysis revised its indexing and set the baseline index at 100 for the year 2000. Previous implicit price deflators were based on a baseline index of 100 for the year 1996.

SAFETY-KLEEN SYSTEMS, INC.
OKLAHOMA CITY, OKLAHOMA

PERMIT ATTACHMENT 7

CONTAINER STORAGE

7.0 MANAGEMENT OF WASTES IN CONTAINERS

7.1 DESCRIPTION OF WASTES TO BE STORED (40 CFR 264.173)

The container storage area in the warehouse and the container storage area in the metal shelter are used for the storage of used immersion cleaner, spent aqueous parts cleaning solutions, spent aqueous brake cleaning solution, spent parts washer solution, dry cleaning wastes, paint wastes, drum washer/dumpster sediment, tank bottom sediment, contaminated debris, and transfer wastes. These may carry one or more of the waste codes listed in the Facility Description -Abstract at the beginning of this application. The wastes are not mixed while on site and incompatible wastes are kept segregated. In addition, proper hazardous waste labels are affixed to the containers. Hazardous waste labels must include the following wording: *"Hazardous Waste - Federal Law Prohibits Improper Disposal If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency."* Labels must also include the generator's name and address and manifest document number.

In addition, the labels must include the EPA waste codes, the accumulation start date and the generator's EPA ID number (if applicable). The container storage areas store DOT approved containers normally ranging in volume from 5 gallons up to an 85-gallon overpack and occasionally bulk storage containers (totes, cubic yard boxes etc.) up to 350 gallons.

7.2 SECONDARY CONTAINMENT STRUCTURES (40 CFR 284.175)

The container storage area in the warehouse has secondary containment in the form of a coated concrete floor which slopes to two, coated concrete, grated, blind trenches located along the north and west sides of the storage area. The area is also surrounded by a six inch wide by four inch high curb.

The metal shelter has secondary containment in the form of a metal pan at its base.

The total containment volume in each storage area is more than 10% of the total volume of the containers that will be stored in each area at a time.

The slabs and collection trenches for the container storage areas are made of steel reinforced concrete. Joints are sealed with chemical-resistant water stops. Steel grates cover the trenches to facilitate the movement of drums across them. The entire base is free of cracks and gaps and has been sealed with chemical resistant coating to further decrease permeability. The wastes in storage

are only incompatible with strong oxidizers and reactive metals, which are not present in the base or sealants.

The total volume of materials (including products and non-hazardous wastes) stored in the container storage areas will not exceed the volume shown in the Waste Analysis Plan (WAP) Abstract.

7.3 PREVENTION OF RUNON, RUNOFF AND ACCUMULATION OF SPILLS (40 CFR 264.175)

The container storage areas are indoors so accumulation of precipitation, runon and runoff is essentially eliminated. Spilled or leaked waste must be removed from the secondary containment systems with sufficient frequency to prevent overflow. Daily inspections for the trenches will result in the removal of any accumulated liquids. A hand-held pump **(e.g.,** COMS pump or wet/dry vacuum), sorbent material or other appropriate methods will be used to remove liquids. Material will be properly disposed of.

7.4 STORAGE CONFIGURATION

The containers of permitted waste will be stored in rows on pallets. Containers that are 55-gallons or larger will not be stacked more than three high and pallets will be used between layers of stacked containers. Containers in the storage areas are moved with a forklift, pallet jack, drum cart or other safe and effective means. Total volume of material (both product and waste) to be stored in the warehouse or metal shelter, at any given time, will not exceed the volume shown in the Waste Analysis Plan (Vt/AP) Abstract.

Incompatible wastes will be segregated appropriately per DOT segregation requirements.

7.5 COMPATIBILITY OF CONTAINERS WITH THEIR CONTENTS AND EACH OTHER (40 CFR 264.172)

All wastes will be stored in containers that meet DOT specifications for those materials.

7.6 HANDLING AND MANAGEMENT OF CONTAINERS

Containers holding hazardous wastes will be closed during storage except when it is necessary to add or remove waste. In addition, containers holding hazardous waste will not be opened, handled or stored in a manner which may rupture the container or cause it to leak. Containers will be closed during movement and, if necessary, opened only in contained areas. Any objects or actions that may cause puncture of containers must be avoided.

7.7 INSPECTIONS (40 CFR 264.174)

The container storage areas must be inspected on all operating days, which excludes weekends and holidays. If a container holding hazardous waste is not in good condition, or it begins to leak, its contents are either transferred to a new container, the leaking container is overpacked or it is managed in another way that complies with this section.

The containment structure must be inspected for cracks, corrosion or any other sign of deterioration .Any sign of deterioration must be noted on the inspection sheet and the deterioration must be remediated.

7.8 BUFFER ZONE REQUIREMENTS (40 CFR 264.176)

In accordance with 40 CFR 264.176, containers holding ignitable wastes must not be stored within 50 feet of the property line. Each container storage area meets the 50 foot buffer zone requirement.

7.9 COMPLIANCE WITH LAND DISPOSAL RESTRICTIONS (40 CFR 268)

In accordance with 40 CFR 268.50, each waste container must be clearly marked to identify its contents and the date the period of accumulation began. No container may be stored for longer than one year (unless it is non-hazardous).

7.10 SUBPART CC {40 CFR 264.1086)

Containers managing hazardous wastes at this facility generally fall into the following categories:

a. Those hazardous waste containers that are less than 26 gallons in capacity are exempt from regulation under Subpart CC. In addition, containers which are "transferred" through the facility are considered to be in the course of transportation, as opposed to storage, and therefore, are not subject to Subpart CC standards.
b. Containers with capacities between 26 and 122 gallons are Level 1 containers, and generally meet the Level 1 standards of the container being covered and designed and operated with no gaps, holes, cracks or other open spaces. In addition, containers used to manage wastes meet applicable U.S. DOT regulations for packaging and transport.
c. Container greater than 122 gallons that manage hazardous wastes at this facility are not in light liquid service and are therefore considered Level 1 covered containers designed and operated with no gaps, holes, cracks or other open spaces. In addition, containers used to manage waste meet applicable U.S. DOT regulations for packaging and transport of hazardous materials.

Hazardous wastes accepted from off-site generators are already containerized when the facility accepts the waste. Such containers are visually inspected at time of pickup, at time of offload for storage or transfer at the facility and during the daily inspection.

SAFETY-KLEEN SYSTEMS, INC.
OKLAHOMA CITY, OKLAHOMA

PERMIT ATTACHMENT 8

TANK STORAGE

8.0 MANAGEMENT OF WASTE IN TANKS (40 CFR 284 SUBPART J)

8.1 DESCRIPTION OF TANK SYSTEM

The waste storage tank system is aboveground and piping outside of secondary containment has welded joints.

The 16,800-gallon aboveground, vertical hazardous waste (HW) storage tank is 21' high and 12' in diameter. The tank is constructed of 3/16" thick (1/4» at the bottom third of the tank) carbon steel painted white to reflect sunlight and minimize corrosion. The tank has been designed in accordance with Underwriters Laboratories (UL) Standard 142 and is located more than 20 feet from the property line, in accordance with Table 2-6 of the National Fire Protection buffer zone requirements. Spent parts washer solution is stored in the tank. The entire facility, including the tank farm, is secured by a 6' high chain link fence topped by three strands of barbed wire.

A manually controlled waste feed cut-off valve located adjacent to the drum washer/dumpster unit at the return and fill station can prevent the waste tank from being overfilled. In addition, the aboveground tank is equipped with a high-level alarm (aural and visual) to indicate when the tank is approximately 95% full. The high-level alarm is inspected daily.

Each tank is equipped with a pressure/vacuum vent which operates at two ounces of pressure and one ounce of vacuum. The tanks operate at atmospheric pressure and venting is to the atmosphere. Also, the twenty-four inch man way on each tank is provided with long bolts, partially threaded, to allow for emergency venting of the tank in the event of an emergency as prescribed by the National Fire Protection Association. The specific gravity of the spent parts washer solution Is approximately 0.8 and the vapor pressure at 68°F is 0.4mm Hg.

8.2 DESCRIPTION OF SECONDARY CONTAINMENT SYSTEM (40 CFR 264.193)

The secondary containment for the tanks consists of a monolithically poured concrete slab and dike wall. Joints are protected with chemical-resistant water stops. The slab is 5u thick and the wall is S ' thick steel-reinforced concrete. The diked area is shown on a drawing in Appendix C and has a containment volume in excess of 16,800 gallons plus the precipitation from a 25-year, 24-hour rain event. Accumulated rainwater will be *removed* from the secondary containment within 24 hours after the ceasing of a rain event. It will be inspected for any appearance of sheen. If no sheen is present, the precipitation will be pumped to ground. If sheen is present, the precipitation will be pumped into the waste storage tank for proper disposal. Currently there are three tanks in the diked

area; two tanks at 16,800 gallons and one tank at 12,000 gallons. One tank (16,800 gal) Is for spent parts washer solution and spent aqueous solutions and the other two (16,800 and 12,000 gal) are for clean parts washer solvent. Each tank is equipped with a high level alarm. Reference is made to the tank farm plan in Appendix C for secondary containment calculations.

8.3 TANK MANAGEMENT PRACTICES (40 CFR 264.195)

The tanks and secondary containment are inspected each operating day excluding holidays and any other occasion when no operations are occurring (e.g. weekends, inclement weather, all-day training, power outage etc.). Specific parameters of the inspection are covered in Section 3.2. Volume gauges must be checked to insure the tanks are not being overfilled. Leaks or signs of deterioration must be noted and remediated immediately. The procedures to remove spilled or leaked material from the secondary containment are described in 4.3.1 and 4.3.2. Spilled or leaked material will be removed immediately upon detection.

8.4 SUBPART CC (40 CFR 264.1084)

There is one waste storage tank at the facility. Tank features as they relate to Subpart CC are as follows: tanks are non-pressurized, fixed-roof type with a capacity of less than 20,000 gallons. The waste stored in the tank exhibits a vapor pressure of less than 5.2 kPa (11.1 psi). The actual vapor pressure of the waste managed is approximately 0.008 psi.

The tanks are designed and operated so that cover openings can be closed with no visible gaps, holes, cracks or other open spaces into the interior of the tanks. The cover and cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position except when the waste is being added or removed from the tanks, or when necessary sampling or repair/maintenance is performed. The tanks are vented to the atmosphere through a safety device which has been designed to operate with no detectable emissions when the device is in the closed position.

Visual inspections of the tanks and control devices are conducted on an annual basis.

SAFETY-KLEEN SYSTEMS, INC.
OKLAHOMA CITY, OKLAHOMA

PERMT ATTCHMENT 9

SPECIAL CONDITIONS

9.0 SPECIAL CONDITIONS - CUP (CONTINUED USE PROGRAM)

9.1 DESCRIPTION

Under the CUP, spent parts washer solutions (hereinafter CUP solvents) collected from customers are eligible to be used for drum washing activities at the facility and are exempt from the definition of hazardous waste as provided in 40 CFR 261.2(e)(1)(ii), when the CUP solvents are managed according to the following:

1. No generators located outside the state of Oklahoma will be allowed to participate in the CUP program at the Oklahoma City, OK service center.

2. Safety-Kleen shall maintain the following records at the facility from each generator for a minimum of three years in accordance with the requirements of 40 CFR 261.2(f):
   a. Name, address and EPA *ID* number (if applicable)
   b. Quantity of CUP solvent picked up
   c. Continued Use Service Checklist

3. CUP solvents that meet any of the following criteria shall be managed as a hazardous waste:
   a. CUP solvent not used to wash drums
   b. CUP solvent that would be ineffective as a drum washing agent
   c. CUP solvent that is cross-contaminated with any foreign materials that would render the CUP solvent ineffective as a drum washing agent

4. Safety-Kleen shall use only the CUP solvent vat located in the Return and Fill shelter area for handling/transference of CUP solvent. Non-CUP solvent will not be placed in the CUP vat.

5. In the event Safety-Kleen discovers that a CUP customer has returned or attempted to return to Safety-Kleen (a) solvents in violation of the criteria set forth in the Solvent Eligibility Form or (b) solvents containing non-solvent, toxic materials of a type or amount not consistent with the customer's normal parts washing activities, Safety-Kleen will warn the customer that *they* may be removed from the program if the problem persists.

6. Safety-Kleen will not speculatively accumulate CUP solvent. To ensure that speculative accumulation is not occurring, CUP solvent must be used within 96 hours of receipt (excluding weekends.)

7. Safety-Kleen shall not use more CUP solvent than necessary for the drum washing operation. No more than 13 gallons of CUP solvent shall be used per drum wash cycle. It should be noted, however, that not every drum can be adequately cleaned with a single drum wash cycle. Therefore, occasionally, more than one wash cycle may be needed to clean a single drum.