Attachment 8

RCRA Part B Permit Application

Closure and Post Closure plan with Estimates and Insurance Information

US Ecology Tulsa, Inc.

EPA ID: OKD000402396

Tulsa, Oklahoma

Permit Application **July 12, 2022**

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1. CLOSURE PLAN

This section provides a general description of the US Ecology Tulsa, Inc. (USE Tulsa) closure plan and financial assurance for closure costs with regard to hazardous waste management units, as required by 40 CFR 270.14(b)(13) and 264.112, as well as the applicable rules and regulations under the Oklahoma Hazardous Waste Disposal Act, 63 O.S., Sections 1-2001 et seq. (as amended) administered by the State of Oklahoma Department Environmental Quality (ODEQ).

USE Tulsa will maintain a copy of the approved closure plan and all subsequent revisions to the plan on-site until the certification of closure completeness has been submitted to and approved by the ODEQ.

This written plan for closure of hazardous waste management units will be amended, and written notification of or request for a permit modification to authorize the change in the approved closure plan will be submitted to the ODEQ whenever:

- Changes in operating plans or facility design affect the closure plan; or
- In conducting partial or final closure activities, unexpected events require a modification of the approved closure plan.

USE Tulsa will submit the notification or request for a permit modification including a copy of the amended closure plan, for approval by the ODEQ, at least sixty (60) days prior to the proposed change in facility design or operation, or no later than sixty (60) days after an unexpected event has occurred which has affected the closure plan. If an unexpected event occurs during the partial or final closure period, USE Tulsa will request a permit modification no later than thirty (30) days after the unexpected event.

a. CLOSURE PERFORMANCE STANDARDS

USE Tulsa manages hazardous waste in three (3) container management areas (CMAs), two (2) container treatment areas (CTAs), and one tank farm (TF) on-site. Specifics regarding these permitted units are provided in Part A Permit Application and Attachment 10- Process Description.

Closure of USE Tulsa hazardous waste management units (or partial closure of these units) will be completed in accordance with the requirements of 40 CFR 264.111; specifically, the facility will be closed in a manner that:

- Minimizes the need for further maintenance
- Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

USE Tulsa will meet this performance standard by removing all hazardous wastes and hazardous waste constituents from hazardous waste tank and container management units. Hazardous waste container storage/treatment units and hazardous waste tank systems are shown in Figure B-l-Facility Layout presented in Attachment 1- Maps and Figures. Specific information regarding hazardous waste management units on-site is presented in Attachment 10-Process Information. Container and tank management systems will be closed in any one or combination of the following (as appropriate):

- Tanks, containment structures, and/or ancillary equipment will be dismantled and disposed of as hazardous waste at a RCRA/HSWA permitted off-site facility;
- Tanks, containment structures, and/or ancillary equipment will be dismantled, decontaminated, and disposed of in accordance with solid waste requirements

- Tanks, containment structures, and/or ancillary equipment will be dismantled, decontaminated, and salvaged for future use either on-site or off-site; or
- Tanks, containment structures, and/or ancillary equipment will be decontaminated, and maintained in place for future use on-site.

In summary, USE Tulsa will close hazardous waste tank and container management units by removal of all hazardous waste and hazardous waste residuals so that there will not be any need for post-closure care (see figure 1 in appendix 3 at the end of this attachment). Closure of the USE Tulsa hazardous waste management facility (or partial closure of any units) will be completed in a manner that minimizes the need for further maintenance. Additional measures will be taken to control, minimize, or eliminate, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

i. PARTIAL AND FINAL CLOSURE ACTIVITIES

USE Tulsa will close hazardous waste tank and container storage/treatment units in accordance with this closure plan unless an alternate partial or final closure plan has been approved by ODEQ. In accordance with 40 CFR 112(e), this closure plan shall not preclude USE Tulsa from removing hazardous wastes and decontaminating or dismantling equipment in accordance with the approved partial or final closure plan at any time before or after notification of partial or final closure.

(1). PARTIAL CLOSURE

Facility closure will not be mandated by capacity limitations because hazardous waste management activities subject to these requirements are not limited by disposal capacity. Partial closure of any one tank or container management unit will not necessitate final facility closure. At the time of partial closure, closure of one or more hazardous waste management units will be in accordance with the final closure procedures or in accordance with a unit specific closure plan approved by the ODEQ.

(2). FINAL CLOSURE

Final closure of hazardous waste management units at US Ecology Tulsa, Inc. will be performed in accordance with the procedures specified in this closure plan unless an alternate plan is approved by the ODEQ. At final closure, individual hazardous management units may be closed individually or as a group. The closure schedule, discussed in figure 3 of appendix 2 at the end of this attachment, may be completed for each hazardous waste management unit prior to total facility closure and subsequent certification to the ODEQ. In the event that hazardous waste management units are closed in sequence, US Ecology Tulsa, Inc. will submit closure certification for affected units after closure of the last unit in the closure sequence.

Temporary storage areas may be developed for storage of wastes which are generated by closure activities. Hazardous wastes generated during closure activities will be stored in temporary storage areas for less than ninety (90) days in accordance with the applicable requirements of 40 CFR 262.34. Specific closure procedures are outlined in Section I-le.

Closure of any hazardous waste management unit will consist of the following steps:

- The total volume of hazardous waste will be removed from the unit; removed wastes will be managed in on-site processes, stored in other container/tank management units on-site, or sent off-site for management in accordance with state and federal regulations.
- Tank systems (if applicable) will be decontaminated by cleaning with high-pressure water, steam, non-phosphate detergent, or other appropriate method. Rinsate and/or cleaning residuals will be managed in accordance with state and federal regulations.

- Containment structures will be visually evaluated for evidence of contamination or indications of release of hazardous waste or hazardous waste constituents from the containment system. In the event that visual contamination is observed, the containment structure will be decontaminated. Decontamination of containment structures will be accomplished by cleaning with high-pressure water, steam, non-phosphate detergent, or other appropriate method. Rinsate and/or cleaning residuals will be managed in accordance with state and federal regulations. Potential releases to soil will be evaluated in accordance with the procedures in appendix 4 at the end of this attachment.

- Decontaminated tank systems or containment structures may be maintained for non-hazardous waste service until final facility closure.

Final closure will be supervised and certified by an independent registered professional engineer. The engineer, at minimum, will inspect closure activities monthly during closure.

ii. MAXIMUM WASTE INVENTORY: 40 CFR 264.112(b)(3)

Hazardous waste that may be on-site at the time of final or partial closure includes waste stored in tanks and containers; specific EPA waste codes managed are identified in the facility Part A Permit Application (Section A). The maximum inventories expected for each of these units is provided in Attachment 10-Process Description.

iii. SCHEDULE FOR CLOSURE: 40 CFR 264.112(b)(6)

US Ecology Tulsa, Inc. plans to initiate final closure activities of container management units within **ninety** (90) days after receipt of the final volume of hazardous wastes. Completion of closure will be within one hundred eighty (180) days of receipt of the final volume of hazardous waste. US Ecology Tulsa, Inc. will notify the ODEQ in writing, at least forty-five (45) days prior to the date on which

final closure of hazardous waste management units is expected to begin. The closure schedule (Figure 3 in appendix 2 at the end of this attachment), provides the schedule for final closure and for intervening closure activities of container storage and treatment areas and tanks.

Because hazardous waste activities are storage and treatment, facility hazardous waste operations are not limited by disposal capacity. Therefore, US Ecology Tulsa, Inc. does not anticipate final facility closure prior to expiration of the RCRA permit for hazardous waste management activities and an estimated year for final closure is not required.

The final closure schedule (as applicable) will also apply for the partial closure of any hazardous waste management unit. In accordance with 40 CFR 264.115, US Ecology Tulsa, Inc. will submit to ODEQ (by registered mail, overnight service, or hand delivery), a closure certification within sixty (60) days of completion of final closure. This certification, signed by US Ecology Tulsa, Inc. and by an independent registered professional engineer, will state that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan.

(1). EXTENSIONS FOR CLOSURE TIME: 40 CFR 264.113(a)&(b)

Us Ecology Tulsa, Inc. does not anticipate that the time for completion of final closure of hazardous waste management units will exceed one hundred eighty (180) days or that treatment or removal of the final volume of hazardous waste will exceed ninety (90) days. US Ecology Tulsa, Inc. will petition the ODEQ for the extended time if that contingency is required. Justification for the extended time requested will be shown in the petition.

iv. CLOSURE PROCEDURES

During closure operations, USE Tulsa will inspect the immediate area around hazardous waste management areas for indications of contamination. Any visible

evidence of contamination such as staining or discoloration will be evaluated for hazardous waste constituents. Affected soil will be evaluated as specified in Figure 1 of appendix 3 at the end of this attachment. Contaminated soils will be removed and managed in accordance with state and federal regulations. Disposal or decontamination of equipment and structures is addressed in the following sections.

(1). INVENTORY REMOVAL, DISPOSAL, OR DECONTAMINATION OF EQUIPMENT: 40 CFR 264.112(b)(4), 40 CFR 264.114

During the partial and final closure periods, all contaminated equipment, structures, and soils will be properly disposed of or decontaminated unless otherwise specified in 40 CFR Part 264.

Any equipment used during decontamination procedures or other closure activities, and thereby contaminated, will be managed as follows:

- All residual waste adhering to the equipment will be removed (to the greatest degree practicable) by scraping
- The equipment will be washed using high pressure water and (if deemed necessary) non-phosphate detergent or other appropriate methods[1]; the final rinsate will be evaluated in accordance with the criteria specified in figure 1 of appendix 3 at the end of this attachment
- Decontaminated equipment will be salvaged for future use or disposed of in accordance with solid waste requirements; equipment deemed contaminated with hazardous waste may be disposed of in accordance with hazardous waste requirements; and the solids and liquids thus generated will be managed as hazardous waste or tested and managed in accordance with state and federal regulations.

By removing any hazardous wastes or hazardous waste constituents during partial and final closure, US Ecology Tulsa, Inc. may become a generator of hazardous waste. Hazardous waste generated during closure activities will be managed in accordance with all applicable state and federal regulations.

(2). CLOSURE OF DISPOSAL UNITS

US Ecology Tulsa, Inc. does not operate any hazardous waste piles, landfills, surface impoundments, or miscellaneous hazardous waste disposal units in which wastes or contaminated materials are to remain at closure; therefore, this section is not applicable to the US Ecology Tulsa, Inc. facility.

(3). CLOSURE OF CONTAINER MANAGEMENT UNITS

Unless partial closure is completed prior to final closure, the final inventory of wastes will be removed from hazardous waste container storage areas (i.e., CMA-1, CMA-2, CMA-3, CTA-2, and CTA-3) and managed off-site or treated in accordance with state and federal regulations (if applicable). After the final inventory of waste has been removed, all loose items (i.e., papers, pallets, empty containers, or other debris) will be removed. These residuals will be managed as hazardous waste at an off-site TSDF or tested and managed in accordance with state and federal regulations or decontaminated prior to disposal or reuse.

The secondary containment structures of containment areas will be cleaned using high pressure water containing (if deemed necessary) non-phosphate detergent solution or containment structures will be decontaminated using another suitable method. The wash water will be collected and managed in accordance with state and federal regulations. The structure will then be rinsed twice; rinsate will be collected and managed in accordance with state and federal regulations. The final rinsate from the hazardous waste container management area will be analyzed and, when the decontamination criteria are satisfactory and when no visible residues remain on the

containment structure, the structure will be deemed clean-closed. Decontamination criteria are located in figure 1 of appendix 3 at the end of this attachment.

After the containment structure has been decontaminated, samples of soil/gravel will be collected around the perimeter of container management area with a minimum of one sample taken from each side of the container management unit. In addition, soil samples will be collected from below the containment structure where visual evidence of a potential release is detected. Soil samples will be evaluated as specified in appendix 4- Soil Evaluation Procedures.

(4). CLOSURE OF TANKS

Unless partial closure is completed prior to final closure, the final volume of hazardous waste stored hazardous waste tank systems will be removed and managed off-site or treated (if applicable). Sludges, if present, will be removed from the tank system and disposed of in accordance with state and federal requirements. Wastes shipped off-site will be managed in accordance with state and federal regulations. US Ecology Tulsa, Inc. may elect to perform dismantling, cleaning and decontamination of the tanks and associated piping in a sequential manner. The following procedures (as applicable) will be used to decontaminate tank systems.

Tanks will be decontaminated using high pressure water containing (if deemed necessary) non-phosphate detergent solution or tanks will be decontaminated using another suitable method. The wash water will be collected and managed in accordance with state and federal regulations. The tank will then be rinsed twice; rinsate will be collected and managed in accordance with state and federal regulations. The final rinsate from the tank will be analyzed and, when the decontamination criteria are satisfactory and when no visible residues remain on surfaces, the tank will be deemed clean-closed. Decontamination criteria are located in figure 1 of appendix 3.

All the ancillary equipment associated with the tank will be detached. The equipment to be disconnected include the piping inlets and outlets. The pipes will be rinsed and decontaminated in accordance with the procedures specified for equipment (or other appropriate method). Any visible spills or leakage detected during the disconnection process will be collected and removed.

US Ecology Tulsa, Inc. will wash the containment structure for the tank system (i.e., TF-1) using steam, high pressure water containing (if deemed necessary) non-phosphate detergent solution or containment structures will be decontaminated using another suitable method. The wash water will be collected and managed in accordance with state and federal regulations. The structure will then be rinsed twice; rinsate will be collected and managed in accordance with state and federal regulations. The final rinsate from each containment system will be analyzed and, when the decontamination criteria are satisfactory and when no visible residues remain on the containment structure, the structure will be deemed to be clean-closed. Decontamination criteria are outlined in figure 1 of appendix 3

Soil evaluation procedures outlined in appendix 4 will be followed during closure of tank containment systems.

(5). CLOSURE OF WASTE PILES: 40 CFR 270.18(h) AND 40 CFR 264.258

US Ecology Tulsa, Inc. does not operate a hazardous waste pile, therefore this section is not applicable.

(6). CLOSURE OF SURFACE IMPOUNDMENT: 40 CFR 270.17(f)

US Ecology Tulsa, Inc. does not operate a hazardous waste surface impoundment, therefore this section is not applicable.

(7). CLOSURE OF INCINERATORS: 40 CFR 264.351

Us Ecology Tulsa, Inc. does not operate a hazardous waste incinerator, therefore this section is not applicable.

(8). CLOSURE OF LANDFILLS: 40 CFR 264.310(a) AND 264.280(b)

Us Ecology Tulsa, Inc. does not operate a hazardous waste landfill, therefore this section is not applicable.

(9). CLOSURE OF LAND TREATMENT FACILITIES: 40 CFR 264.280(a)

US Ecology Tulsa, Inc. does not operate a hazardous waste land treatment facility, therefore this section is not applicable.

(10). CLOSURE OF MISCELLANEOUS UNITS: 40 CFR 264.601

US Ecology Tulsa, Inc. does not operate miscellaneous hazardous waste units, therefore this section is not applicable.

2. POST CLOSURE PLAN

US Ecology Tulsa, Inc. does not operate hazardous waste disposal activities or units subject to this permit and designated for closure in place. At final closure, all hazardous wastes and hazardous waste constituents will be removed from hazardous waste management areas. Ground water monitoring may, however, continue after closure. Financial assurance has been added in the event that ground water monitoring is required after closure of the facility.

3- NOTICES REQUIRED FOR DISPOSAL FACILITIES

a. NOTICES REQUIRED FOR DISPOSAL FACILITIES

US Ecology Tulsa does not operate hazardous waste disposal activities or units subject to this permit and designated for closure in place. At final closure, all hazardous wastes and hazardous waste constituents will be removed from hazardous waste management areas. Therefore, US Ecology Tulsa, Inc. is not subject to post-closure requirements.

i. CERTIFICATION OF CLOSURE: 40 CFR 264.115

During closure, an independent registered professional engineer will inspect and certify the closure activities. Within sixty (60) days of completing closure, a certification of closure will be submitted to the ODEQ by an independent registered professional engineer. The closure certification will be signed by both the owner or operator and the independent registered professional engineer.

ii. SURVEY PLAT: 40 CFR 264.116

This section is not applicable since this closure does not address the closure of hazardous waste disposal units.

iii. NOTICE TO LOCAL AUTHORITIES: 40 CFR 264.119

This section is not applicable since this closure does not address the closure of hazardous waste disposal units.

iv. POST CLOSURE CERTIFICATION: 40 CFR 264.120

This section is not applicable since this closure does not address the closure of hazardous waste disposal units.

v. NOTICE IN DEED TO PROPERTY: 40 CFR 270.14(b)(14) AND 40 CFR 264.119

This section is not applicable since this closure does not address the closure of hazardous waste disposal units. However, a notice in the deed to the property has been recorded with the County Clerk in Book 4762, Page 1726, to notify any potential purchaser of the property of the following:

- a disposal well has operated at the site
- wastes have been injected into the underground strata
- additional information may be obtained from the ODEQ

b. CLOSURE COST ESTIMATES: 40 CFR 270.14(b)(15); 40 CFR 264.142 AND 264.197(c)(3)

The cost associated with closure of the US Ecology Tulsa, Inc. hazardous waste facility is presented in figure 1 of appendix 2 at the end of this attachment. The costs are based on total decontamination and removal of all hazardous wastes and hazardous waste constituents from hazardous waste container and tank management units. Closure costs will be adjusted annually for inflation using price indexes provided by ODEQ.

c. FINANCIAL ASSURANCE MECHANISM FOR CLOSURE: 40 CFR 270.14(b)(15), 40 CFR 264.143

The financial assurance mechanism in place for closure of the US Ecology Tulsa, Inc. facility is a Stand by Letter of Credit. This Stand by Letter of Credit is discussed below.

i. CLOSURE TRUST FUND: 40 CFR 264.143

US Ecology Tulsa, Inc. has a Stand by Letter of Credit included in appendix 1 of this attachment.

d. CONTINGENT POST-CLOSURE COST ESTIMATE: 40 CFR 270.14(b)(16) AND 40 CFR 264.144

There are no units remaining at US Ecology Tulsa, Inc. which require the use of contingent post closure provisions.

e. FINANCIAL ASSURANCE MECHANISM FOR POST CLOSURE CARE: 40 CFR 270.14(b)(16) AND 40 CFR 264.145

There is no post closure required for this facility.

f. LIABILITY REQUIREMENTS

The following is a discussion of the financial mechanisms in place to fulfill the liability requirements of 40 CFR 264.147.

i. COVERAGE FOR SUDDEN ACCIDENTAL OCCURRENCES: 40 CFR 264.174(a)

US Ecology Tulsa, Inc. demonstrates its financial ability to compensate third party damages and injuries through a pollution liability issued by Philadelphia Insurance Companies. A copy of the current Certificate of Insurance is provided in Appendix 1-Insurance Documents.

ii. COVERAGE FOR NON-SUDDEN ACCIDENTAL OCCURRENCES: 40 CFR 264.147(b)

US Ecology Tulsa, Inc. does not operate a surface impoundment, landfill, land treatment facility, or miscellaneous disposal unit that is used to manage hazardous waste, therefore this section does not apply.

iii. REQUEST FOR VARIANCE: 40 CFR 264.147(c)

US Ecology Tulsa, Inc. is not requesting a variance from liability requirements, therefore this section does not apply.

----------**END OF SECTION**----------

Appendix 1- Insurance Documents

Figure 1- COI for Closure and/or Post-Closure Care

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"):
US Ecology, Inc.
101 S. Capital Blvd., Suite 1000
Boise, ID 83702

FACILITIES COVERED:

Name:	US Ecology Tulsa, Inc.
Address:	2700 South 25th West Avenue Tulsa, OK 74107
EPA ID Number:	OKD000402396
Closure:	$1,558,707.05
Face Amount:	$1,558,707.05
Policy Number:	CPC E620949 01
Effective Date:	December 31, 2021

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.

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OK-SOLID WASTE-CPC (1/00)

Figure 2- Premises Environmental Coverage Declarations (Pollution Liability)

PIC-EVPN-001 (03/18)

PHILADELPHIA INSURANCE COMPANIES
A Member of the Tokio Marine Group

One Bala Plaza, Suite 100
Bala Cynwyd, Pennsylvania 19004
610.617.7900 Fax 610.617.7940
PHLY.com

Tokio Marine Specialty Insurance Company

PREMISES ENVIRONMENTAL COVERAGE DECLARATIONS

Policy Number: PPK2304750

THIS IS A CLAIMS MADE AND REPORTED POLICY WITH DEFENSE COSTS INCLUDED IN THE LIMITS OF INSURANCE. VARIOUS PROVISIONS IN THIS POLICY RESTRICT COVERAGE. READ THE ENTIRE POLICY CAREFULLY TO DETERMINE RIGHTS, DUTIES, AND WHAT IS OR IS NOT COVERED.

In return for the payment of the premium, and subject to all the terms of this policy, we agree to provide you with the insurance stated in this policy.

ITEM

1. **First Named Insured:** US Ecology, Inc.
2. **Mailing Address:** 101 S Capitol Blvd Ste 1000, Boise, ID 83702
3. **Your Insured Location:**

☑ if checked here, **Your Insured Location** is designated via endorsement.

4. **Policy Period:** From: 8/1/2021 To: 8/1/2022
(12:01 A.M. Standard Time at Your Mailing Address)
5. **Coverages and Limits of Insurance:**

Insuring Agreements Forming Part of This Policy	Limit of Insurance
A. Remediation Expense and Liability Coverage - On-Site Contamination	Not Offered
B. Remediation Expense and Liability Coverage - Off-Site Contamination	$4,000,000 Per Contamination Incident
C. Claims for Bodily Injury and Property Damage Resulting from Contamination	$4,000,000 Per Contamination Incident
D. Non-Owned Locations – Bodily Injury, Property Damage, and Remediation Expense	Not Offered

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PIC-EVPN-001 (03/18)

E. Transportation	$4,000,000 Per Contamination Incident
F. Image Restoration	$25,000 Per Contamination Incident

6. **Total Policy Aggregate Limit:** $ 28,000,000

7. **Self-Insured Retention:** $ 250,000

8. **Premium:** $ 61,629.00
   Insurer Processing Fee: $175

9. **Retroactive date:**
   a. **Remediation Expense and Liability Coverage - On-Site Contamination:**
      - **See Endorsement 317**
   b. **Remediation Expense and Liability Coverage - Off-Site Contamination:**
      - **See Endorsement 317**
   c. **Claims for Bodily Injury and Property Damage Resulting from Contamination:**
      - **See Endorsement 317**
   d. **Non-Owned Disposal Sites Retroactive Date: Not Offered**
   e. **Transportation Retroactive Date: 3/31/2000**

10. **Endorsements Forming Part of This Policy When Issued:**

SEE FORMS SCHEDULE

11. **Producer:**
    Name: Willis Towers Watson Insurance Services West, Inc.
    Address: 2000 S. Colorado Blvd, Tower II, Ste. 900, Denver, CO 80222

12. **Notices**

Notice of Claim, Coverage, or Contamination	All other notices
Claims - Environmental One Bala Plaza, Suite 100 Bala Cynwyd, PA 19004 – 0950 Facsimile: 1 (800) 685-9238 Telephone: 1 (800) 765-9749 Email: claimsreport@phly.com	Commercial Lines Underwriting Environmental Division One Bala Plaza, Suite 100 Bala Cynwyd, PA 19004

This policy has been signed by the Company's President and Secretary.

President & CEO

Secretary

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Appendix 2- Closure Estimates

Figure 1- Closure estimates with up-to-date adjustment

TF-1	$310,072.46		
CMA-1	$53,952.45		
CMA-2	$35,251.02		
CMA-3	$169,530.42		
CTA-2	$57,654.93		
CTA-3	$429,168.12		
Process Equipment	$6,758.60		
Groundwater Monitoring	$36,000.00		
Tank Closure Certs	$7,280.00		
Container Storage/Treatment Area Closure Certification	$3,640.00	2012 (2.1% CPI)	2021 adjustment
Total	$1,109,308.01	$1,109,540.97	
Contingency @ 15%	$166,396.20	$166,431.15	
Contingency @ 20%	$221,861.60	$221,908.19	
Total per 15%	$1,275,704.22	$1,275,972.11	
Total per 20%	$1,331,169.62	$1,331,449.16	$1,558,707.05

Figure 2- Maximum Extent of Unclosed Hazardous Waste Management Operations

Figure 2- Maximum Extent Unclosed Hazardous Waste Management Units		
Hazardous Waste Management Type (Process)	**Permitted Volume (cubic yards)**	**Permitted Volume (gallons)**
Tank Storage - 4 Tanks in TF-1		68,720
Container Storage (solid/liquids)		45,960
Container Storage (no free liquids)	960	
Total Volume - Existing Hazardous Waste Storage	**960**	**114,680**

Figure 3- Closure Schedule for Hazardous Waste Management Units

Figure 3 **Closure Schedule for Hazardous Waste Management Units**	
Closure Activity	**Days Elapsed**
Notification in writing to ODEQ of intent to begin closure activities.	- 45
Receipt of known final volume of hazardous waste into container or tank management unit or receipt of ODEQ approval of closure plan, whichever is later **(see note 1)**	0
Begin treatment and/or removal all hazardous wastes from container or tank management unit(s) **(see note 2)**	30
Complete treatment and/or removal of all hazardous wastes from container or tank management unit(s).	90
Complete removal and (if necessary) decontamination of ancillary equipment, tanks, and empty containers.	120
Complete decontamination of secondary containment structures.	135
Conduct visual investigation for evidence of contamination of surrounding/underlying soil and (if necessary) begin soil sampling/remediation activities.	150
Complete final closure activities.	180
Submit certification to the ODEQ (by USE Tulsa and independent registered professional engineer) that the hazardous waste management unit/facility has been closed in accordance with the specifications of the approved closure plan **(see note 3)**	240

Notes

1. If an unexpected event during closure of a hazardous waste management unit requires modification of the approved closure plan, USE Tulsa will request a permit modification within 30 days of the unexpected event.
2. In the event that there is a reasonable possibility that the hazardous waste management unit will receive additional hazardous wastes, USE Tulsa will initiate closure activities no later than one year after the date on which the unit received the most recent volume of hazardous waste as specified under 40 CFR 264.112(d)(2).
3. Requirements for inspection and certification by an independent engineer do not apply to partial closure activities

Appendix 3- Analysis Parameters of Decontamination Rinsate

Figure 1- Analysis Parameters of Decontamination Rinsate[1]

Contaminant	Maximum Concentration Level[2] (mg/L)
Arsenic	5.0
Barium	100.0
Benzene	0.5
Cadmium	1.0
Carbon tetrachloride	0.5
Chlordane	0.03
Chlorobenzene	100.0
Chloroform	6.0
Chromium	5.0
o-Cresol	200.0
m-Cresol	200.0
p-Cresol	200.0
Cresol	200.0
2,4-D	10.0
1,4-Dichlorobenzene	7.5
1,2-Dichloroethane	0.5
1,1-Dichloroethylene	0.7
2,4-Dinitrotoluene[3]	0.13
Endrin	0.02
Heptachlor (and its epoxide)	0.008
Hexachlorobenzene[3]	0.13
Hexachlorobutadiene	0.5
Hexachloroethane	3.0
Lead	5.0
Lindane	0.4
Mercury	0.2
Methoxychlor	10.0
Methyl ethyl ketone	200.0
Nitrobenzene	2.0
Pentachlorophenol	100.0
Pyridine[3]	5.0
Selenium	1.0
Silver	5.0
Tetrachloroethylene	0.7
Toxaphene	0.5
Trichloroethylene	0.5
2,4, 5-Trichlorophenol	400.0

2,4,6-Trichlorophenol	2.0
2,4,5-TP (Silvex)	1.0
Vinyl chloride	0.2

Notes

1. Concentrations based on regulatory levels for the toxicity characteristic specified in 40 CFR 261.24, as amended July 1993
2. The structure, ancillary equipment, or other item being decontaminated will be considered clean when the difference between the contaminant concentration in the final rinsate and the contaminant concentration in the rinse water before use if less than these levels.
3. Quantification limit is greater than the calculated regulatory level. Hence, the quantification limit becomes the regulatory level as provided in 40 CFR 261.24.

Appendix 4- Soil Evaluation Procedures

1. **Background Sample:** A composite background sample will be obtained from 3 locations on-site considered unaffected by facility operations. These samples will be taken at a depth of 0.5 to 1.0 feet using US EPA (Compendium of ERT Soil Sampling and Surface Geophysics Procedures**.** EPA/540/P-91/006, United States Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington DC 20460 (Section 2.0, Soil Sampling: SOP #2012) or equivalent sampling method.

2. **Visually Contaminated Soil:** All visible contaminated soil will be removed, evaluated for TCLP constituents, and managed in accordance with state and federal regulations. After removal of visually contaminated soil, 1 sample will be taken at a depth of 0.5 to 1.0 feet using a USEPA sampling method or equivalent method. The soil sample will be evaluated for TCLP constituents specified in 40 CFR 261.24.

3. **Clean Criteria:** Soil will be considered clean for closure when results of sample analysis are comparable to background levels or less than the regulatory levels for the toxicity characteristic specified in 40 CFR 261.24 (as amended July 1993), whichever is greater. If soil does not meet these conditions, an additional 0.5 feet of soil will be removed and evaluation will be repeated as specified in step 2 above. USE Tulsa will repeat the sequence until the clean criteria are satisfied. Soil will be removed or otherwise managed in accordance with the requirements of 40 CFR 262.