



Development and Operations Plan

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The Cleaning Guys LLC. dba CG Environmental – Tulsa, Oklahoma

November 2021



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The Cleaning Guys LLC. dba

CG Environmental

2801 South 25th W Ave

TULSA, OKLAHOMA 74107

PLAN DATE:

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1.0 INTRODUCTION

The Cleaning Guy's (herein after referred to as CG Environmental) intends to operate a hazardous waste transfer station in west Tulsa, Oklahoma (hereafter referred to as the "Facility"). CG Environmental will provide comprehensive hazardous waste management services to clients throughout the central, southwest, and mid-western United States along with providing on-site/mobile railcar and vessel washing services. The emphasis at CG Environmental is to combine a thorough understanding of regulatory and management requirements with an excellent knowledge of operational needs for our customers. The focus of our organization is a proactive approach to waste management solutions and results.

1.1 Development and Operations Plan Format

This Development and Operations Plan (referred to herein as the D&O Plan) has been written to meet the requirements set forth in Oklahoma Administrative Code (OAC).

1.1.1 Cross Reference Table with Applicable 252:205-15 and 40 CFR 264 Regulations

The Following table lists locations in the D&O Plan that satisfy the applicable regulations in OAC 252:205-15 and 40 CFR 264:

Code	Regulation	Section of D&O Plan Meeting Requirements
252:205-15-1	Applicability and consideration of Other Laws	D&O Plan
252:205-15-2	Development and Operations Plan	
	(a)	D&O Plan
	(b)	
	(1)	DOP-1 Site Plans
	(2)	
	(A)	4.0
	(B)	4.0, 5.0
	(C)	2.3
	(D)	5.3.1, DOP-6
	(E)	5.4
	(F)	5.5
	(3)	6.0, DOP-9, DOP-10, DOP-11
	(4)	DOP-14
	(5)	DOP-1 Site Plans, 3.0, 4.0
	(6)	8.0, DOP-16, DOP-15
	(c)	5.2
252:205-15-3	Design and Operation	DOP-1 Site Plans, 4.0
252:205-15-4	Modifications	N/A
252:205-15-5	Exclusionary Siting Criteria	N/A
252:205-15-6	No Endangerment	D&O Plan

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Code		Regulation	Section of D&O Plan Meeting Requirements
40 CFR 264	14	Security	6.4, DOP-15
	15	General Inspection Requirements	6.3, DOP-11
	16	Personnel Training	7.0, DOP-10
	17	General Requirements for Ignitable, Reactive, or Incompatible Wastes	5.5
40 CFR 264	30	Applicability	General Applicability
	31	Design and operation of Facility	4.0,5.0, DOP-1 Site Plans
	32	Required Equipment	DOP-9, Section 6
	33	Testing and Maintenance of Equipment	DOP-11
	34	Access to Communication or Alarm System	DOP-9
	35	Required Isle Space	DOP-11
	36	[Reserved]	N/A
	37	Arrangements with Local Authorities	DOP-9, Section 9
40 CFR 264	50	Applicability	General Applicability
	51	Purpose and Implementation of Contingency Plan	DOP-9, Section 1
	52	Content of Contingency Plan	DOP-9
	53	Copies of Contingency Plan	DOP-9, Section 9
	54	Amendment of Contingency Plan	DOP-9
	55	Emergency Coordinator	DOP-9, Section 3
	56	Emergency Procedures	DOP-9, Sections 3-7
40 CFR 264	110	Applicability	General Applicability
	111	Closure Performance Standard	DOP-14, Section 1

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Code	Regulation	Section of D&O Plan Meeting Requirements
	Closure Plan	DOP-14
	Closure: Time Allowed for Closure	DOP-14, Section 9
	Disposal or Decontamination of Equipment, Structures and Soils	DOP-14, Sections 3-4
	Certification of Closure	DOP-14, Section 9
40 CFR 264	Applicability	General Applicability
	Definition of Terms	Definitions
	Cost Estimate for Closure	DOP-14, Section 10
	Financial Assurance for Closure	DOP-15
	Liability Requirements	N/A
	Incapacity of Owners or Operators, Guarantors, or Financial Institutions	DOP-15
	Use of State-Required Mechanisms	N/A
	State Assumption of Responsibility	N/A
	Wording of the Instruments	N/A

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2.0 FACILITY BACKGROUND

2.1 Hazardous Waste Transfer Station (OAC 252:205-15) A Hazardous Waste Transfer Station Development and Operations Plan [D&O Plan] has been developed and submitted for/by approval to the Oklahoma Department of Environmental Quality (ODEQ). Certain activities meet the definition of a Hazardous Waste Transfer Facility as described in OAC 252:205-1-2. As a result, the Facility operations anticipate expansion to include all those authorized by such D&O Plan approval.

CG Environmental previously notified ODEQ on EPA Form 8700-12 of hazardous waste transportation activities and received EPA ID Number OKD049069842 for the property at 2801 S. 25th West Ave, Tulsa, Oklahoma.

CG Environmental operates a railcar and transportation vessel washing service and performs the duties of a hazardous waste transporter under the transportation authority of MiD-America Waste Solutions for 40 CFR 262 manifested quantities of hazardous waste. Upon final approval CG Environmental shall meet the definition of a hazardous waste transfer facility as described in 40 CFR 263.11. The intended function of transferring hazardous waste from one container or tank to another results in CG Environmental also being subject to the ODEQ hazardous waste transfer station requirements, as set forth in OAC 252:205-15 – Transfer Stations. CG Environmental acknowledges these ODEQ regulations are more stringent than federal regulations for hazardous waste transporters and transfer stations.

2.2 Other Facility Activities CG Environmental is an environmental service provider that provides a wide range of environmental services such as railcar/industrial service cleaning, emergency response, hazardous waste transportation and management. The facility houses equipment to support these activities along with performing railcar and transport vessel transfer/cleaning services on site. The location is currently seeking a permit for Wastewater Treatment and discharge. The anticipated wastewater streams for treatment will be organic hydrocarbon-based materials and will be separated and recycled/reclaimed as product and the water will be treated to meet federal, state and discharge requirements. Detailed rail yard information is included in Appendix DOP-18.

2.2.1 Used Oil (UO) Processing Facility (40 CFR 279) CG Environmental previously notified ODEQ on EPA Form 8700-12 of used oil processing facility activities. Used oil is accepted for chemical and physical processing. This activity is not subject to the hazardous

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waste transfer station requirements set forth in OAC 252:205-15, however it is regulated under OAC 252:205-3-2(m). The appropriate filing is included in Appendix DOP-16. CG Environmental does not recycle used oil on-site but conducts emulsion breaking and/or physical separation to consolidate used oil for shipment off-site to used oil processors, who then process and market the oil as spec oil.

2.2.2 Universal Waste (UW) Handling Facility (40 CFR 273) CG Environmental intends to operate a Universal Waste Handling Facility and has made notification via EPA Form 8700-12 of Large Quantity Handler status. Universal Waste is accepted for storage, consolidation and subsequent shipment to another handling facility or destination facility. All Universal Waste is shipped off-site for recycling. This activity is subject to the Universal Waste Management requirements set forth in OAC 252:205-3-2(I). The appropriate filing is included in Appendix DOP-16.

2.2.3 Municipal Solid Waste Handling Facility (252-205-15(c)) As set forth in 252:205-1(b), a solid waste permit will not be required for the Facility, provided the Facility is operated under an approved D&O Plan, as described in 252:205-15-2(c). As the Facility will handle incidental quantities of solid waste, a demonstration of compliance with the applicable MSW rules are provided in Tabs 7 through 14 of this Transfer Station Permit Application.

2.3 Hours of Operation CG Environmental is typically open Monday through Friday from 8:00 AM to 5:00 PM, excluding company specified holidays. However, due to demands of emergency response and Facility production requirements, CG Environmental can operate 24 hours per day, seven days per week. CG Environmental is also capable of receiving non-emergency response deliveries outside of normal business hours with prior notice.

3.0 TYPES OF WASTE MANAGED AT FACILITY

The following provides a description of the types of waste managed or proposed to be managed at the Facility.

The following table summarizes the quantities of liquid material storage capabilities by designated location on site for various liquid waste streams accepted by the Facility:

VSQG/Household Hazardous/Non-RCRA Industrial Liquid Waste Holding Capabilities		
Building, Pad or Other Area	Material	Liquid Container Storage Volume
B-1A	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	5,712 Gallons or 103 - 55-gallon drum equivalent
B-1B	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	11,773 Gallons or 214 - 55-gallon drum equivalent
B-1C	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	9,949 Gallons or 180 - 55-gallon drum equivalent
B-2B	Hazard Classes: NHIW, Universal Waste, E-Waste	3,740 Gallons or 68 - 55-gallon drum equivalent
WP-1	Hazard Classes: 3, 8, 6 and class 9	9,568 Gallons or 173 - 55-gallon drum equivalent
P-2	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	3,740 Gallons or 68 - 55-gallon drum equivalent
WWTP A-1 (Tank Farm)	Hazard Classes: Class 3 (off-spec Fuel) Non RCRA	130,071 Gallons or 5 - 25,000-gallon frac tank equivalent
WWTP A-2 (Tank Farm)	Hazard Classes: Class 3 (off-spec Fuel) Non RCRA	48,137 Gallons or 1.9 - 25,000-gallon frac tank equivalent
TLB	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	4,903 Gallons or 89 - 55-gallon drum equivalent
N-1 (Truck Parking Area)	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	57,420 Gallons or 11.5 - 5,000-gallon tanker equivalent
All Listed Classes		285,013 Gallons or: 5,182 - 55-gallon or 11.4 - 25,000-gallon frac tanks or 59 - 5,000-gallon tanker equivalent

3.1 Small Quantity Generator (SQG) and Large Quantity Generator (LQG) Hazardous Waste (40 CFR 262) SQG and LQG (Referred to as “10-Day Waste”) is manifested from the generator to a designated facility other than CG Environmental. CG Environmental performs the duties of a hazardous waste transporter for 10-Day Waste, as described above. 10-Day Waste can be bulked and consolidated into containers at the facility during the normal course of 10-Day waste storage at the facility.

VSQG Waste may pass through the transfer station directly manifested or designated for a facility other than CG Environmental – Tulsa. VSQG waste manifested to a facility other than CG Environmental, will be managed along with other SQ and LQ EPA hazardous waste, and is subject to the 10-Day rule per 40 CFR 263.

The following waste categories are proposed to be managed by CG Environmental at the CG-Tulsa Facility. These wastes categories are different than SQG and LQG categories described above because CG Environmental is listed as the designated facility on

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Hazardous Waste Manifests, Non-Hazardous Manifests, Bill of Lading or similar shipping documents. CG Environmental will accept the following wastes for consolidation, storage, and subsequent transfer to an authorized or permitted disposal facility. For ease of reading and regulatory review, an acronym has been provided for each of these waste types and is used throughout this D&O Plan.

3.2 Very Small Quantity Generator (VSQG) Hazardous Waste the Facility accepts VSQG waste for consolidation, storage less than 90 days, and transfer. Although it is not required by 40 CFR 261.5, a VSQG generator may choose to ship hazardous waste on a uniform hazardous waste manifest with waste codes indicated for identification purposes. VSQG is also acceptable for receipt on a bill of lading, non-hazardous manifest or similar document. All US EPA hazardous waste codes are acceptable for management.

VSQG Hazardous wastes will be accepted for consolidation, storage, and transfer to a permitted TSD or recycling facility. The Facility will have a 90-day storage time limit for VSQG waste accepted for consolidation, storage, and transfer. Once VSQG waste is accepted for storage, the waste will be managed in accordance with LQ generator standards for container management, storage, manifesting and LDR requirements.

3.3 Used Oil (UO) The Facility accepts used oil subject to 40 CFR Part 279. Sources of used oil include HHW collection, commercial and industrial clients. Used oil is delivered to the Facility and processed; then either stored individually or combined with other oily wastes prior to transfer offsite for further processing. Methods of processing include emulsion breaking and phase separation.

3.4 Universal Waste Universal Waste, as defined in 40 CFR 273.9, accepted at the Facility includes batteries, mercury-containing materials, pesticides, and lamps. Universal Waste is accepted for storage, consolidation, and subsequent shipment to another handling facility or destination facility. Universal Wastes are stored and consolidated in areas B-1A, B-1B and B-1C of the Facility Building (as indicated on Figure 1A). An enclosed accumulation trailer for lamps is located on the South side of the facility as indicated on Figure 1A.

3.5 Sludges and Wastewater The Facility accepts non-RCRA non-hazardous industrial oily wastewater and sludges for storage, processing, consolidation, and ultimate offsite disposal and recycling of recovered oil. Wastewater and sludges may be processed by emulsion breaking and/or phase separation. Recovered oil is collected for recycling.

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3.6 Household Hazardous Waste (HHW) HHW waste may be accepted at the Facility for consolidation, storage, and ultimate offsite disposal at approved TSDFs in accordance with the table below:

CG Environmental Household Hazardous Waste Handling Technologies

Material	Waste Handling
Inorganic Acid/Bases	Pour at Facility
SQG & LQG Hazardous Waste	Yes
Aerosols	Pack on Site
Batteries	Pack on Site
Fluorescent Bulbs	Pack on Site
Antifreeze	Pour at Facility
Oil	Pour at Facility
Latex Paint	Bulk at Facility
Oil Base Paint	Bulk at Facility
Liquid Pesticides	Pour at Facility
Solid Pesticides	Pack on Site
Mercury Articles	Pack on Site
Miscellaneous Chemicals	Lab Pack on Site
Flammable Solids	Pack on Site
Flammable Liquids	Pour at Facility

3.7 Non-hazardous Industrial Solid Waste (NHIW) The Facility accepts NHIW from off-site generators and generates NHIW on-site in the form of rinsewater from railcar/vessel cleaning. Material will be collected for on-site treatment or shipment and disposed of off-site. Accumulated precipitation on-site, Non-hazardous stormwater is pumped from the containment area(s) pending analysis, if stormwater does not meet the requirements of the stormwater discharge permit; Conforming stormwater will be discharged on-site per Site Stormwater Plan and Discharge Permit requirements.

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CG Environmental accepts bulk shipments of non-recoverable oily wastewaters, coolants, tanker heels, and other NHIW waste as defined in Appendix F of OAC 252:515. Bulk shipments are temporarily stored on-site for up to 90 days in designated NHIW tanks or vacuum boxes located in the WWTP tank farm or other secondary containment designated area(s). CG Environmental will also accept containerized shipments of NHIW that may be consolidated and shipped off-site for solidification and landfill. Total NHIW storage capacity in Tank farm and transloading bay consists of 200,000 gallons of tank capacity and 3,636 55 gallons drum containment capacity. Containerized shipments of NHIW are stored in the transload bay and areas B-1A, B-1B, B-1C and WP-1.

Latex paint, adhesives, grout, caulk, and similar materials are consolidated into a lined, watertight roll-off container and shipped for solidification and landfill. This container is shipped to the landfill approximately every 30 days, or when it becomes full. These materials are stored in roll-offs in the N-1 or TLB process areas.

NHIW waste solids are accepted for consolidation and shipped off-site for disposal. The waste stream consists of plant trash, RCRA empty pails and non-recyclable containers, and other off spec, non-hazardous chemical, and pharmaceutical waste. This waste is stored in one roll-offs in N-1 or the Tank Farm area. CG Environmental will comply with OAC 252:515-31 and submit non-hazardous certifications to the ODEQ for each waste stream that is disposed of at a solid waste disposal facility in Oklahoma.

CG Environmental will submit a monthly report to the ODEQ for all waste streams accepted more than 10 cubic yards per month.

3.8 Solid Waste Permits CG Environmental handles incidental quantities of solid waste as a component of the waste transfer operations described herein. As set forth in 252:205-15(b), a solid waste permit is not required, provided the Facility is operated under an approved D&O Plan, as described in 252:205-15-2(c). As the Facility handles incidental quantities of solid waste, a demonstration of compliance with the applicable MSW rules are provided in Tabs 7 through 14 of this plan.

3.9 RCRA Permits As set forth in 252:205-15-1(c), a RCRA permit has not been sought for the Facility, and no portions of the ODEQ rules have been superseded.

3.10 Exempt Activities No exempt activities, as set forth in OAC 252:205-15-1(d), are conducted at the Facility, other than consolidation of CESQG and HHW wastes.

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3.11 Waste Receiving, Labeling, and Tracking CG Environmental has developed protocols for the receiving, labeling, and tracking of all waste managed by the Transfer Station. Components of the protocol include:

- Developing a work order, manifest, and a Waste Acceptance Plan (if required) for all waste received by CG Environmental.
- Inspecting waste markings upon receipt and applying the proper markings if received markings are not sufficient.
- Applying a bar code to each waste container for internal tracking. Upon scanning, the waste is placed into physical inventory.
- Collecting waste samples and tracking samples with bar code.
- Tracking waste through disposal, consolidation, bulking by bar code.
- Updating manifests within system upon receipt of return generator copy of manifest.
- Developing waste tracking report identifying disposition from the return manifest. Schematics of the waste receiving protocol, CG Environmental bar code protocol, and trailer unloading protocol are provided in Appendix DOP-2.

4.0 BUILDING DESIGN AND HOLDING CAPACITY OF FACILITY

Waste operations are primarily conducted in multiple buildings and pad areas that existed prior to their acquisition by CG Environmental. As a result, historical engineering plans for the buildings are not available. The following provides description of the building size, construction, and use.

The following descriptions are for the buildings and concrete pad areas located at 2801 S 25th W Ave. Tulsa, OK and for the contiguous property located at 2700 S 25th W Ave., Tulsa, OK 74107. A site plan (Figure 1A) of the Facility is provided in Appendix DOP-1.

4.1 Building 1 B-1 (B-1A, B-1B and B-1C): Administration/Waste Storage, Shipping and Receiving Warehouse

4.1.1 Description Located at 2801 South 25th West Ave., a portion of Building B-1 serves as office space, restrooms, laboratory, and an employee breakroom. The remainder of the building (denoted B-1A, B-1B and B-1C) is utilized for shipping and receiving of multiple waste streams, storage of non-RCRA waste streams, water reactive, and storage of 10-day wastes. Constructed of metal walls on a concrete slab foundation, the building is approximately 18,841 total square feet in area.

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The administration portion of the building (B-1) occupies approximately 2,127 square feet and includes upstairs and downstairs departments for administrative offices, operations, and waste compliance.

The warehouse portion of the building (B-1A) occupies approximately 4,000 square feet. This portion of the building has a total of two overhead doors, two common fire-rated overhead doors: one to (B-1B), and one to the above grade concrete ramp. This ramp is utilized for forklift access and movement of containerized waste from B-1B to N-1.

Building B-1A adjoins B-1B/B-1C and is separated by a partial 12' four-hour rated firewall. The two areas are connected by a common roll type fire door that is wired to the fire suppression detection system on either side of the walls. The roll door will shut in the event of a fire. Material handling equipment in B-1A includes standard industry items such as, forklifts, drum grabbers, drum dollies, sampling equipment, electronic platform scale, bung wrenches, speed wrenches, and torque wrenches.

Safety equipment includes a decontamination shower (located in B-1A Locker Room), eye wash station (on the wall between the roll door and man door), first aid kit (located B-1A near man-door), and fire extinguishers located throughout the building. For locations of safety equipment, See Figure 1A and Site Plan III Emergency Plan, copies of which are incorporated into Appendix DOP-1.

4.1.2 Waste Activities (B-1A) The warehouse operations conducted in B-1A include waste receiving, sampling, shipping, 10 Day Waste storage, other waste storage, supply storage and waste transfer.

4.1.3 Waste Receiving, Tracking and Recordkeeping (B-1) Waste manifested to CG Environmental and determined to be received in accordance with the Facility Waste Analysis Plan (WAP) will be managed within one day of the determination. This management includes either, (1. relocation into storage, 2. solids may be bulked and consolidated into roll off boxes on adjacent Transloading Pad or 3. liquids may be directly transferred by vacuum into bulk tankers. Waste receiving, labeling, and tracking is described in Section 3.11 of this D&O Plan.



4.1.4 Waste Holding Capacity (B-1A) Area B-1A, a portion of which is designated for 10-day waste and accepted materials for bulk and consolidation, has a maximum capacity of 5,712 gallons or 103 55-gallon drum equivalents. All or part of this storage may be used for facility storage, provided the storage is conducted in a manner that does not interfere with the ability of the Facility to receive additional waste.

The 10-day waste in this building is considered in transport and accompanied by a hazardous waste manifest.

Waste containers stored in B-1A are segregated by DOT hazard class and the segregation table found in 49 CFR 177.848.

4.1.5 Description (B-1B) is designated for waste storage and processing. The building is constructed of steel beam and sheet metal exterior on a concrete slab foundation. B-1B is approximately 7,856 total square feet of floor space with a 5,396 square foot containment can hold 11,773 gallons or 214 55-gallon drum equivalent. Material handling equipment in B-1B includes standard industry items such as, forklifts, drum grabbers, drum dollies, sampling equipment, electronic platform scale, bung wrenches, speed wrenches, and torque wrenches. Safety equipment includes a decontamination shower, eye wash station, first aid kit, and fire extinguishers located throughout the building. For locations of safety equipment, See Figure 1A and Site Plan III Emergency Plan, copies of which are incorporated into Appendix DOP-1.

B-1B adjoins B-1A and is separated by a partial 12' four-hour rated firewall. B-1B is connected to B-1A. The two areas are connected by a common roll type fire door that is wired to the fire suppression detection system on either side of the walls. The roll door will shut in the event of a fire. This portion of the building has a total of four overhead doors, four common fire-rated overhead doors: one to (B-1A), two large pull-through doors and one to the above grade concrete dock. This dock is utilized for loading/unloading containerized waste from 20-foot to 53-foot vans.

4.1.6 Waste Activities (B-1B) The warehouse operations conducted in this area include waste receiving, sampling, shipping, waste transfer, waste



processing, bulking & consolidation, and waste storage. Wastes typically handled include 10 Day waste, CESQG waste (including compressed gas cylinders), HHW, UW, and recyclable materials, including scrap metals and cardboard, metal bearing solutions, compressed gas cylinders, and used electronics. More information of storage and consolidation of recyclable materials is provided in Appendix DOP-13.

4.1.7 Waste Holding Capacity (B-1B) The containerized waste storage capacity is 11,773 gallons or approximately 214 55-gallon drum equivalents.

Waste containers stored in B-1B will not be stacked more than two containers in height per 55- gallon drum equivalent. The containers will be stacked on appropriate pallets. Aisle spacing of a minimum of 2-feet will be maintained between rows of containers.

Waste containers are stored according to DOT hazardous material guidelines. Each row in B-1B has a designated hazard class(s). Containerized wastes will only be stored adjacent to compatible hazard classes. For example, flammable liquids and flammable solids can be stored in adjacent rows. Corrosive materials will be broken down further into Acid and Base rows. The facility may adjust the configuration as inventory dictates and compatibility guidelines are observed.

Area B-1B also serves as storage for empty steel and poly containers. Empty containers range in size from 2 gallon to 110 gallon over packs, 275-gallon tote tanks to 660-gallon portable tanks. Additional storage is also provided for clay-based absorbents, absorbent pads, booms, and packing materials (e.g., vermiculite).

4.1.8 Building B-1 (B-1C): Waste Storage / Shipping and Receiving (B-1C) is designated for waste storage, material handling, and equipment storage. The building is constructed of steel beam and sheet metal exterior on a concrete slab foundation. (B-1C) is approximately 5,985 total square feet in area.

Material handling equipment in B-1C is consistent with industry operations and includes fork trucks, drum grabbers, drum dollies, sampling equipment, bung wrenches, speed wrenches and torque wrenches.

Area B-1C is attached to B-1B.

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Safety equipment includes multiple fire extinguishers located throughout the building. For locations of safety equipment see Figure 1A and Site Plan III, Emergency Plan included in Appendix DOP-1.

4.1.9 Waste Activities (B-1C) The waste handling operations conducted in B-1C include waste shipment, receiving, transfer, bulking, consolidation, and storage of containerized wastes and empty-drum crushing. The manually operated drum crusher is placed inside of a drip pan to catch any residual liquid that may drip from the empty drums. Liquids collected in the drip pan are cleaned up with absorbent pads and disposed of as hazardous waste when necessary. Specifications for the drum crusher unit are provided in Appendix DOP-4.

4.1.10 Waste Holding Capacity (B-1C) The containerized waste storage capacity of B-1C is 9,949 gallons or approximately 180 55-gallon drum equivalents. A minimum 2-foot aisle space is maintained throughout the Facility. The capacity is derived from: 1 pallet (3.3 ft x 4 ft) spot = 8 drums/double stacked x 3 deep = 24 drums per row 7 rows of pallets x 24 drums = 168 drums

4.2 Building 2 (B-2A): Maintenance Storage Building 2 (B-2A), is used primarily for storage of building and maintenance tools and equipment. The building is occupied and managed by an onsite mechanic that performs routine equipment maintenance and repairs. B-2A The building is constructed of steel beam and sheet metal exterior on a concrete slab foundation. The building is occupied and managed by an onsite mechanic that performs routine equipment maintenance and repairs. B-2A The building is constructed of steel beam and sheet metal exterior on a concrete slab foundation.

4.2.1 Waste Activities (B-2A) Waste handling activities are not conducted in B-2A.

4.2.2 Waste Holding Capacity 2 (B-2B) Building 2 (B-2B), is used for storage of NHIW waste. B-2A The building is constructed of steel beam and sheet metal exterior on a concrete slab foundation. B-2B has a built-in secondary containment pit installed in the floor (10'x20'x3"). The containerized liquid waste storage capacity is 3,740 gallons or approximately 68 55-gallon drum equivalents.

4.3 Transloading Bay (TLB): Waste Storage and Processing Operations

4.3.1 Description Transloading Bay (TLB) The structure is situated on a concrete slab foundation. The roof and partial side walls construction is sheet metal. TLB is approximately 1435 square feet in area with an additional 164 square feet of containment. Truck and vehicular access to the TLB is through the southeast openings. The building (including entrance points) is equipped with a 5" sloped interior-29 ½ -inch curb which provides secondary containment. The secondary containment capacity is approximately 3,724 gallons, the additional containment area is 41' wide and 4' long with a 16.5" curb. The area also has a L12"x W12"x D16.5" collection sump that adds an additional 1,199-gallon capacity. The curvature of the TLB is directed to the collection sump and allows for an approximate total containment value of 4,903 gallons or 89 x 55-gallon drum equivalents for the entire Transloading Bay. The capacity was calculated as follows: Area Square Footage – 1599 ft² Height of Slope – 5 inches – 1 cubic foot (ft² = 7.48 gallons Capacity – 1,599 ft² X 0.41 ft x 7.48 gallons/ft³ = 4,903 gallons) Material handling equipment in TLB is consistent with industry operations and includes pneumatic pumps, canister filters, forklifts, drum grabbers, drum dollies, sampling equipment, transfer hoses, bung wrenches, speed wrenches, and torque wrenches. Safety equipment includes multiple fire extinguishers located throughout the building, eye wash station and decontamination shower. For locations of safety equipment see Figure 1A, included in Appendix DOP-1.

4.3.2 Waste Activities (TLB) The transloading bay (TLB) is mainly used for receiving oil and oily wastewater and storage of Liquid Hazardous and Non-Hazardous materials. Oil is accumulated for off-site recycling and wastewater is consolidated and transported off-site for treatment at a permitted facility. Wastewater treatment shipping and receiving activities are also performed in this area. All equipment is manually operated. Containerized waste operations conducted in this area include waste receiving, sampling, shipping, waste transfer, waste processing, bulking, consolidation, and storage.

4.3.3 Waste Holding Capacity (TLB) The curvature of the TLB is directed to the collection sump and allows for an approximate total containment value of

4,903 gallons or 89 x 55-gallon drum equivalents for the entire Transloading Bay. The capacity was calculated as follows: Area Square Footage – 1599 ft² Height of Slope – 5 inches – 1 cubic foot (ft² = 7.48 gallons Capacity – 1,599 ft² X 0.41 ft x 7.48 gallons/ft³ = 4,903 gallons) Material handling equipment in TLB is consistent with industry operations and includes pneumatic pumps, canister filters, forklifts, drum grabbers, drum dollies, sampling equipment, transfer hoses, bung wrenches, speed wrenches, and torque wrenches. Safety equipment includes multiple fire extinguishers located throughout the building, eye wash station and decontamination shower. For locations of safety equipment see Figure 1A, included in Appendix DOP-1.

4.4 Wastewater Treatment Plant Area-1 (WWTP A-1): Waste Storage and Processing Operations

4.4.1 Description (WWTP A-1) Wastewater Treatment Containment Area-1 (WWTP A-1) is designated for Bulk waste storage, material handling, and wastewater treatment. The Dike is constructed of concrete walls on a concrete slab foundation. (WWTP A-1) is approximately 17,388 total square feet in area. Total Dike Area W 56' X L 69' X H 4.5. The containment dike of the WWTP Area-1 Tank Farm offers approximately 130,071 gallons of bulk tank storage or 5 x 25,000-gallon frac tank equivalents. The containment area is used to store hazardous and non-hazardous materials, non-hazardous wastewaters, oily wastewaters and used oil. Incompatible waste will be stored in the appropriate storage areas B-1A, B-1B or area B-1C. See Appendix DOP-3 for individual tank and container storage capacities and intended uses.

4.4.2 Waste Activities (WWTP A-1) The Wastewater Treatment Plant Area-1 is mainly used for containment of oil and oily wastewater storage of Liquid tank containment Hazardous and Non-Hazardous materials. Oil is accumulated for off-site recycling and wastewater is consolidated and transported off-site for treatment at a permitted facility. Wastewater treatment, shipping and receiving activities are also performed in this area. All equipment is manually operated. Containerized waste operations conducted in this area include waste receiving, sampling, shipping, waste transfer, waste processing, bulking, consolidation, and storage.

4.4.3 Waste Holding Capacity (WWTP A-1) The containment dike of the WWTP Area-1 Tank Farm offers approximately 130,071 gallons of bulk tank storage or 5 x 25,000-gallon frac tank equivalents. Material handling equipment in WWTP A-1 is consistent with industry operations and includes pneumatic pumps, canister filters, forklifts, drum grabbers, drum dollies, sampling equipment, transfer hoses, bung wrenches, speed wrenches, and torque wrenches. Safety equipment includes multiple fire extinguishers located throughout the building, eye wash station and decontamination shower. For locations of safety equipment see Figure 1A, included in Appendix DOP-1.

4.4.4 Wastewater Treatment Plant Area-2 (WWTP A-2): Waste Storage and Processing Operations

4.4.5 Description (WWTP A-2) Wastewater Treatment Containment Area-2 (WWTP A-2) is designated for Bulk waste storage, material handling, and wastewater treatment. The Dike is constructed of concrete walls on a concrete slab foundation. (WWTP A-2) is approximately 6,435 total square feet in area. Total Dike Area W 55' X L 39' X H 3'. The containment dike of the WWTP Area-2 Tank Farm offers approximately 48,137 gallons of bulk tank storage or 1.9 x 25,000-gallon frac tank equivalents. The containment area is used to store hazardous and non-hazardous materials, non-hazardous wastewaters, oily wastewaters and used oil. Incompatible waste will be stored in the appropriate storage areas B-1A, B-1B or area B-1C. See Appendix DOP-3 for individual tank and container storage capacities and intended uses.

4.4.6 Waste Activities (WWTP A-2) The Wastewater Treatment Plant Area-2 is mainly used for containment of oil and oily wastewater storage of Liquid tank containment Hazardous and Non-Hazardous materials. Oil is accumulated for off-site recycling and wastewater is consolidated and transported off-site for treatment at a permitted facility. Wastewater treatment, shipping and receiving activities are also performed in this area. All equipment is manually operated. Containerized waste operations conducted in this area include waste receiving, sampling, shipping, waste transfer, waste processing, bulking, consolidation, and storage.

4.4.7 Waste Holding Capacity (WWTP A-2) The containment dike of the WWTP Area-2 Tank Farm offers approximately 48,137 gallons of bulk tank storage or 1.9 x 25,000-gallon frac tank equivalents. Material handling

equipment in WWTP A-2 is consistent with industry operations and includes pneumatic pumps, canister filters, forklifts, drum grabbers, drum dollies, sampling equipment, transfer hoses, bung wrenches, speed wrenches, and torque wrenches. Safety equipment includes multiple fire extinguishers located throughout the building, eye wash station and decontamination shower. For locations of safety equipment see Figure 1A, included in Appendix DOP-1.

4.5 Pad 1 (WP-1): Wash-Bay Area Pad 1 (WP-1) is a contiguous concrete pad with a collection sump and a 5 ½" curb surrounding the lengths and the rear width of the pad. The concrete is sloped in a manner that all free liquids flow to the collection sump at the back of the containment pad and can hold an approximate total volume of 9,568 gallons or 173 x 55-gallon drum equivalents. It is located at the Southeast portion of the complex. This area has sufficient structural strength to support historical heavy truck traffic at the Facility. The total area of WP-1 is approximately 2,300 square feet.

4.5.1 Description WP-1 is also used for Hazardous/Non-Hazardous tank and vessel washout operations. All waste material generated from washout operations will be evaluated and will have an approved profile prior to cleaning activities. Once the operation has been completed the waste material generated will be appropriately collected, containerized, and labeled for storage and proper off-site waste disposal.

4.5.2 Waste Activities WP-1 is also used for selected, manual waste processing, transfer, and consolidation into larger containers. This area is used for waste consolidation. After consolidation, waste will be moved into one of the designated storage areas or transferred off site for final disposal.

4.5.3 Waste Holding Capacity WP-1 is also used for temporary overnight parking of trucks that arrive outside Facility operating hours. A maximum of two 4,800-gallon tankers and two short trucks totaling 5,000 gallons (total 13,000 gallons) are anticipated to be parked on WP-2 overnight at any given time.

4.6 Pad 2 (P-2): Waste Consolidation Area Pad 2 (P-2) is a concrete area within the fenced area located at the Southwest side of Building 1 near the Tank Farm Area. P-2 is utilized for liquid waste consolidation. Once the operation has been completed the waste material generated will be appropriately collected, containerized, and labeled for



storage and proper off-site waste disposal. The total area of P-2 is approximately 500 square feet. Pad-2 can hold an approximate total volume of 3,740 gallons or 68 x 55-gallon drum equivalents.

4.7 Storage Building 1 (S-1): Storage Area 1 (S-1) is used primarily for storage of supplies and equipment. S-1 The building is constructed of steel beam and sheet metal exterior on a concrete slab foundation. Waste storage capabilities are limited to NHIW/Non-RCRA solid waste streams unless stored on containment pallets. This area is not equipped with secondary containment.

4.8 Storage Building 2 (S-2): Storage Area 2 (S-2) is used primarily for storage of supplies and equipment. S-2 The building is constructed of steel beam and sheet metal exterior on gravel. Waste storage capabilities are limited to NHIW/Non-RCRA solid waste streams unless stored on containment pallets. This area is not equipped with secondary containment. Solid waste streams are often stored under cover in this area (tarpred) under the cover of the structured awning.

4.9 Facility Overflow Storage Areas (N-1) Wastes accepted by CG Environmental may not be immediately processed in the designated buildings. As such, waste may remain in the devices in which they were transported to the Facility. Such devices may include roll-off boxes, box trucks, enclosed trailers, or bulk liquid storage tanks. CG Environmental catalogs the waste immediately after receipt on-site to ensure the waste does not stay on-site past the allowed duration (10-Day waste is removed from site within 10 days, for example). These wastes may be located anywhere within the Facility security fence line but are mostly located in the yard at the Northwest side of the Facility. CG Environmental has specified up to 57,420 gallons of liquid container storage capacity or 11.5 5,000 gallons of bulk tanker storage capacity in N-1. Liquid container storage wastes that are temporarily located outside the designated areas may include 10-Day waste, CESQG, HHW, UW, NHIW, or any combination thereof. This waste will be included in the waste holding capacity estimates, as well as the financial assurance calculation.

4.10 Summary of Waste Holding Capacities The following table summarizes the waste holding capacities of the various Areas of the Facility:

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VSQG/Household Hazardous/Non-RCRA Industrial Liquid Waste Holding Capabilities		
Building, Pad or Other Area	Material	Liquid Container Storage Volume
B-1A	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	5,712 Gallons or 103 - 55-gallon drum equivalent
B-1B	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	11,773 Gallons or 214 - 55-gallon drum equivalent
B-1C	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	9,949 Gallons or 180 - 55-gallon drum equivalent
B-2B	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	3,740 Gallons or 68 - 55-gallon drum equivalent
TLB	Hazard Classes: 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	4,903 Gallons or 89 - 55-gallon drum equivalent
WWTP A-1 (Tank Farm)	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	130,071 Gallons or 5 - 25,000-gallon frac tank equivalent
WWTP A-2 (Tank Farm)	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	48,137 Gallons or 1.9 - 25,000-gallon frac tank equivalent
WP-1	Hazard Classes: 3, 8, 6 and class 9	9,568 Gallons or 173 - 55-gallon drum equivalent
P-2	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	3,740 Gallons or 68 - 55-gallon drum equivalent
Storage Building 1 (S-1)	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	57,420 Gallons or 11.5 - 5,000-gallon tanker equivalent
Storage Building 2 (S-2)	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	57,420 Gallons or 11.5 - 5,000-gallon tanker equivalent
N-1 (Yard Overflow)	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	57,420 Gallons or 11.5 - 5,000-gallon tanker equivalent
Total ALL	All Listed Classes	285,013 Gallons or: 5,182 - 55-gallon or 11.4 - 25,000-gallon frac tanks or 59 - 5,000-

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VSQG/Household Hazardous/Non-RCRA Industrial Liquid Waste Holding Capabilities		
Building, Pad or Other Area	Material	Liquid Container Storage Volume
B-1A	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	5,712 Gallons or 103 - 55-gallon drum equivalent
B-1B	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	11,773 Gallons or 214 - 55-gallon drum equivalent
B-1C	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	9,949 Gallons or 180 - 55-gallon drum equivalent
B-2B	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	3,740 Gallons or 68 - 55-gallon drum equivalent
TLB	Hazard Classes: 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	4,903 Gallons or 89 - 55-gallon drum equivalent
WWTP A-1 (Tank Farm)	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	130,071 Gallons or 5 - 25,000-gallon frac tank equivalent
WWTP A-2 (Tank Farm)	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	48,137 Gallons or 1.9 - 25,000-gallon frac tank equivalent
WP-1	Hazard Classes: 3, 8, 6 and class 9	9,568 Gallons or 173 - 55-gallon drum equivalent
P-2	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	3,740 Gallons or 68 - 55-gallon drum equivalent
Storage Building 1 (S-1)	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	57,420 Gallons or 11.5 - 5,000-gallon tanker equivalent
Storage Building 2 (S-2)	Hazard Classes: 3, 5.1, 5.2, 6.1, 6.2, 8, 9 and Non RCRA	57,420 Gallons or 11.5 - 5,000-gallon tanker equivalent
N-1 (Yard Overflow)	Hazard Classes: 2, 3, 4, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8, 9, NHIW and Non RCRA	57,420 Gallons or 11.5 - 5,000-gallon tanker equivalent
Total ALL	All Listed Classes	285,013 Gallons or: 5,182 - 55-gallon or 11.4 - 25,000-gallon frac tanks or 59 - 5,000-

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4.11 Demonstration that Free Liquids Consolidation is Limited to Areas with Adequate Secondary Containment

All wastes containing free liquids will be consolidated inside B1-A, B1-B, B1-C, TLB, WP-1, P-1 and P-2. These areas are constructed with secondary containment. Tanker loading and unloading is conducted in the TLB (Trans loading Bay). The Trans Loading Bay is structured to provide secondary containment for loading/unloading activities.

Waste containing free liquids may also be consolidated in Facility buildings or pad areas that do not have secondary containment structures provided a containment pallet with volume capacity in accordance with 40 CFR 264.175 and/or sufficient to contain the contents of the consolidation container is utilized as secondary containment.

Waste containing free liquids may also be vacuumed into a bulk tanker after being received per the facility WAP. The liquid waste will then be transported for treatment and disposal in the Wastewater (WWTP) area and/or to an off-site TSD facility.

Solid wastes without free liquids may be consolidated on non-secondary containment structures including Pad-1. These structures have adequate concrete bases and areas adjacent to the consolidation container to prevent releases to soil, surface water or groundwater.

Bulking and consolidation activities on the WP-1 and P-2 will not be allowed during times of precipitation. This methodology and procedure is in compliance with the container storage requirements of 40 CFR 264.175(c) which allows storage of waste without free liquids in non-secondary containment units. The likelihood of precipitation is determined the night before, and no operations are conducted if there is a 50% or more chance of precipitation. Any materials stored outdoors will be covered in a covered trailer or under polyethylene sheeting prior to a precipitation event. Additionally, waste will be stored on pallets or in roll off boxes, which are elevated to prevent contact with accumulated liquids.

In summary, these structures and equipment are utilized to prevent releases to soil surface water or groundwater. Absorbents and spill response equipment will be readily available to respond to any emergency.

4.12 Management of Spills on Uncovered Secondary Containment Pads

CG Environmental conducts and documents facility inspections at least daily. If a spill is discovered during the formal daily facility inspection or any informal inspection, the inspector will follow the procedure outlined in section 6.3 of this D&O Plan. The facility



also conducts weekly inspections in accordance with the facility Spill Prevention, Control, and Countermeasures (SPCC) Plan, located in the facility office. Spill control, containment and remediation measures are also further discussed in the facility Inspection Plan, Provided in Appendix DOP-11.

If a spill or splash occurs during a consolidation process, employees will stop what they are doing and attend to the spill. Pour-off operations will be conducted over poly sheeting so that spills or drips outside of the containment pallets will not contaminate the ground or cement pad.

Small spills or drips will be cleaned up with universal absorbent pads and/or oil dry. The spilled materials will be researched to determine if it is hazardous, and the cleanup materials will be managed accordingly. Larger spills may require the contingency plan to be enacted. All employees receive annual training on the contingency plan and spill reporting notifications.

The secondary containment system in the Trans Loading Bay is a closed system, with no pumps or valves to allow the outward flow of a discharge. Stormwater is visually inspected for evidence of a spill, such as a sheen or discoloration. Stormwater collected in the containment area is pumped out with a vacuum tanker within 24 hours and shipped off site for disposal. Stormwater from this containment area is not released into the Municipal Separate Storm Sewer System (M64).

5.0 Waste Processing

5.1 Tanks and containers Received at facility Descriptions of the individual Facility tanks including materials of construction are shown in appendix DOP-3.

Containers are accepted in various sizes and configurations. These containers range in size from one gallon to 95-gallon drums, DOT specification cylinders, 275-gallon to 660-gallon tote tanks, cubic yard boxes and bags, 2500 to 4,875 gallon tankers, and 20-to-40-yard roll offs. The construction of containers is variable but can include fiber, poly, and stainless steel. For non-DOT hazardous materials, non-specification packaging may also be used.

5.2 Waste Processing Descriptions CG Environmental conducts many types of storage, processing and treatment activities in tanks and containers.

CG Environmental Household Hazardous Waste Processing

Handling Codes	Site Location (B=Building #) (P=Pad #)	Typical Waste Category
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Container Storage	B-1A, B-1B, B-1C, WP-1, WWTP A-1, WWTP A-2 P-2, TLB B-2B, N-1, S-1 and S-2	SQG, LQG, CESQG, UO, UW, non-HAZ sludge/wastewater, HHW, and NHIW
Tank/Tanker Storage	WP-1, WWTP A-1, WWTP A-2 P-2, TLB, N-1	UO, NHIW, HHW
Consolidation	B-1A, B-1B, B-1C, WP-1, WWTP A-1, WWTP A-2 P-2, TLB B-2B, N-1	SQG, LQG, CESQG, UO, UW, non-HAZ sludge/wastewater, HHW, and NHIW
Solidification	B-1A, B-1B, B-1C, WP-1, WWTP A-1, WWTP A-2 P-2, TLB B-2B, N-1	NHW
Decanting	B-1A, B-1B, B-1C, WP-1, WWTP A-1, WWTP A-2 P-2, TLB B-2B, N-1	UO, CESQG, HHW, non-HAZ sludge/wastewater
Other (Compaction)	B-1A, B-1B, B-1C,	Drum Crushing Only
Blending	B-1A, B-1B, B-1C, WP-1, WWTP A-1, WWTP A-2 P-2, TLB B-2B, N-1	CESQG, HHW and NHIW
Heel Removal	B-2C, TLB, WP-1	Non-HAZ sludge/wastewater
Truck Staging Area	B-2C, TLB, WP-1, N-1	Non-HAZ sludge/wastewater

These treatment, storage, and processing methods, as they apply to CG Environmental, are further discussed below.

Container Storage: Waste managed at the Facility will be stored in various size bulk and non-bulk containers. Various containers are utilized and may range from compressed gas cylinders, one to 110-gallon drums, totes, cubic yard boxes/bags and 20 to 40 cubic yard roll off boxes. CG Environmental will perform various consolidation and repackaging operations on compatible wastes in containers. These operations do not constitute treatment and are designed to facilitate more efficient and economical transportation to ultimate TSD facilities. Reference the EPA memorandums in Appendix DOP-5 for a distinction between these storage activities as compared to treatment.

Tank Storage: Tank storage is primarily associated with used oil processing. These tanks are utilized for storage and treatment of waste prior to shipment off-site to appropriate disposal facilities. Certain tanks are also designated for used oil storage after physical and chemical separation from processed wastewater. A tank schedule is shown in Appendix DOP-3.

Consolidation: CG Environmental performs consolidation on hazardous waste (SQG, LQG, and CESQG), used oil, universal waste, non-hazardous sludges/wastewater, HHW, and NHIW.

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Consolidation consists of taking similar incoming waste streams and combining them to increase efficiency before transporting the consolidated waste to an appropriate off-site disposal facility. CG Environmental relies on generator waste profiles of incoming waste to determine how to best consolidate waste streams. For CESQG waste streams, CG Environmental is the Generator and is noted as such on outgoing manifests. The Site is subject to requirements as any other waste generation facility.

The facility intends to become registered as a LQG generator that allows CG Environmental to consolidate any waste that loses its exemption when comingled with regular hazardous waste. Quarterly and biennial reports of these wastes will be provided in accordance with LQG generator requirements.

Solidification: A similar process may also be utilized for free liquid solidification for non-hazardous sludges to meet the criteria of no free liquids at certain non-hazardous waste landfills. Examples of some solidification agents are sawdust, corn cob or similar items. CG Environmental will take measures to keep airborne dust from creating a nuisance. This operation will not be performed outside during high winds. This is analogous to the ODEQ solid waste definition of bulking.

Decanting (Physical Separation): CG Environmental decants liquids from sludges and solids in containers. This process is performed by routine material handling methods such as pumping, dewatering, and pouring off liquids from solids. Decanting operations would be conducted in buildings B-1A, B-1B, B-1C, WWTP, TLB, WP-1, P-1 and B-2B which are designed with secondary containment. Spillage is avoided by using equipment designed to minimize such along with the proper training of employees conducting the operations. Equipment types include, but are not limited to, vacuum units, drum stingers and other system transfer devices.

Other (Compaction): Drum crushing is performed with a crushing unit on empty drums in B-1A, B-1B and B-1C. Compaction of empty drums is not considered treatment as no physical, chemical, or biological alteration of waste is taking place.

Blending: CG Environmental conducts basic fuel blending of fuel value liquids and solids in containers and tankers. This routine activity is like decanting in that typically fuel value liquids are removed from solid and heavy sludge phases. Soluble organic solids are also dispersed in liquid as a method of blending. CG Environmental does not operate any type of solids dispersing or grinding units for fuel blending. Blending is also performed in containers for antifreeze. Freeze point specifications will determine the level of blending. Used oil is also blended to meet subsequent used oil processing facility specifications. CG Environmental does not blend to produce specification used oil as determined in 40 CFR 279.11.

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Organic vapor releases during blending activities are prevented or minimized by opening the least number of containers to be blended at any given time and closing of containers with the blended liquids immediately after filling the containers. Pumping containers into bulk vacuum tankers is through a closed system. Tankers are loaded from the bottom or rear of the tanker, leaving the dome cover closed to reduce organic vapor release.

Heel-Removal: Industrial wastewater is collected from customer facilities' sumps. The oily water contains the oil, water, and solids. Prior to acceptance, the material is profiled, and contents of tankers are verified upon arrival. The liquid is offloaded into sludge boxes and staged for treatment. Vacuum trucks are used to transport this material from the generator's location to our Facility for emulsion breaking and/or physical separation prior to being sent off-site to a permitted facility.

Solids can build up in the vacuum tankers and require occasionally clean out (heel removal). When the heel removal has been scheduled, the tankers are placed into a containment area. The contents of the tanker are flushed out into 30-yard roll-off containers. Because this material is non-hazardous oily waste, the solids and sludge are disposed in a subtitle class "D" landfill. The landfill disposal facilities that accept these wastes require that re-profiling and TCLP analysis be conducted every 2 to 3 years.

5.3 Waste Processing Methodologies

5.3.1 Waste Transfer and Bulking Procedures (Including Capability Analysis) Prior to any waste transfer and bulking procedures CG Environmental will confirm the identity of each waste received in accordance with the procedures in the facility Waste Analysis Plan (WAP). The facility WAP is shown in Appendix DOP-6. After waste confirmation by the WAP, the facility may conduct waste transfer and bulking activities on selected waste streams. Attachment 4 of DOP-6 (WAP) contains waste fingerprint screening procedures and procedures for determining waste to waste compatibility that may be required prior to waste transfer and bulking operations.

All activities described in this section will be performed in accordance with the CG Environmental Standard Operating Procedure (SOP) for waste transfer, bulking, consolidation and repackaging as shown in Appendix DOP-6. The forms shown within this SOP are typical of those to be (or currently) utilized. These

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forms may change to equivalent or alternate forms based upon changes in regulations, customer needs, operations, company policy or other needs without additional ODEQ approval.

5.3.2 Containerized Waste Transfer, Consolidation, Bulking and Mixing

CG Environmental, ODEQ and Federal regulations utilize these terms for the management of waste. These terms are for all practical purposes all the same and may be used interchangeably through this application. The waste management operations relative to these terms include opening containers of pourable, pumpable, or dumpable liquids and solids, which are subsequently, transferred, consolidated, bulked and/or mixed into larger or smaller containers, roll-off boxes, or tankers. Wastes may be from the same generator or a combination of generators.

Before any waste is placed into another container, Facility management considers the compatibility of the waste with the container construction and the waste already stored therein. If there is any suspicion of incompatibility, additional waste compatibility testing may be performed.

Waste to waste compatibility of solids may be accomplished by evaluation of WAP testing, specific compatibility, testing data from the waste profile, and/or knowledge of the waste source at the discretion of Facility management.

Waste to waste compatibility of liquids may be accomplished by evaluation of WAP testing, specific compatibility, testing data from the waste profile, and/or knowledge of the waste source at the discretion of Facility management.

Waste compatibility testing is not performed when waste is transferred, consolidated, or bulked into an empty container or tank of similar waste type provided waste was received according to the Facility WAP. For 10-Day Waste, waste compatibility testing will be performed when transferring, consolidating, or bulking hazardous waste with different DOT shipping descriptions. 10-Day Waste with the same DOT shipping name may or may not undergo compatibility testing at the discretion of facility management.

In general, a VSQG hazardous waste does not lose the assignment of any hazardous waste code as the result of undergoing transfer, consolidation, and bulking.

Waste compatibility testing is not performed on lab-packs and other small containers prior to being consolidated into larger containers. These wastes will have already been verified and accepted in accordance with the WAP and considered to be like types of waste for purposes of compatibility and/or DOT. If, upon visual inspection of these containers, there is any question of compatibility, testing will be performed prior to being added to the larger container. Additional compatibility precautions (bucket testing), involve adding the waste to a small intermediate container prior to adding to the larger container. For example, small lab-pack inner containers are added to a five-gallon container. The five-gallon container compatibility with the ultimate larger container such as a 55-gallon drum can then be determined per the SOP.

Containerized waste transfer, bulking and consolidation will be conducted when:

- Proper personal protective equipment is worn.
- A minimum protective distance of 2 feet from other waste not directly involved in the repackaging is maintained to allow safe access for inspection.
- Proper DOT containers and labels are identified and used (if DOT regulated).
- Waste compatibility is determined by management.
- The waste transfer bulking and consolidation location shall be within storage buildings or pad areas. If operations involve free liquids, they will be conducted in a storage building with secondary containment or on containment pallets in other buildings or pad areas. If transferring liquids to a tanker, it will also be within secondary containment in building B-1A, B-1B, B-1C, WP-1, WWTP A-1, WWTP A-2 P-2, TLB and B-2B Tanker to tanker transfer shall be conducted in the wash pad (WP-1) or transloading bay (TLB). Absorbents, spill response and fire protection equipment will be readily available during the transfer process.
- Residues of waste in empty containers are handled per 40 CFR 261.7. Remove and/or obliterate previous markings as necessary.
- Tracking reports will reflect change in container size, volume, or quantity.

5.3.3 Containerized Waste Repackaging Liquid and solid waste in small containers contained in larger outer containers such as lab-packs, loose-packs, batteries, vials, aerosols, or other manufactured articles which when repackaged, would not involve opening the small containers (e.g., no waste removed from inner packages causing direct waste to waste contact). This repackaging will typically be conducted to satisfy the ultimate



treatment/disposal facilities acceptance criteria. Such repackaging will be performed in compliance with this D&O Plan, including but not limited to prevention of hazards and the specific compatibility testing. Repackaging will be conducted only when:

- Proper personal protective equipment is worn.
- A minimum protective distance from other waste not directly involved in the repackaging is maintained.
- Proper DOT containers and labels are identified and used (if DOT regulated).
- Waste compatibility will be determined by lab pack inventory sheets, visual inspection of small containers, the CG Environmental SOP and published reference material (e.g., MSDS, Hawley's, Merck, 40 CFR 264 Appendix V).
- The repackaging location shall be within waste storage buildings, loading dock, or pad areas shown on Figure 1A (Appendix DOP-1). If waste repackaging involved free liquids, the operation will be conducted in a storage building with secondary containment or on containment pallets in other buildings or pad areas. Absorbents, spill response and fire protection equipment will be readily available.
- Residues of waste in empty containers are handled per 40 CFR 261.7. Remove and/or obliterate previous markings as necessary. Tracking reports will reflect changes in container size, volume, or quantity.

5.4 Provisions to Assure Wastes destined for Disposal in Non-Hazardous Waste Facilities are not Comingled with Hazardous Waste

Upon receipt of waste at CG Environmental, verification procedures in accordance with the WAP are performed, which includes verification confirmation of the container markings. Bulking containers are issued bar-coded labels which indicate the waste profile number, the DOT description, and the outbound disposal facility to aid plant personnel when bulking and consolidating waste. Prior to bulking and consolidating waste the operations manager (or his/her designee) approves all waste for the specific operation to be performed.

To prevent the comingling of non-hazardous and hazardous wastes, CG Environmental utilizes a tracking system that provides a bar-code for each container. The bar-codes are scanned into a computer program designed to track waste shipments. Prior to shipment, consolidation container inventories are reviewed for appropriate wastes, to ensure that like wastes are chosen for consolidation and that the material meets the

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criteria of the outbound profile. The tracking system carries hazardous waste codes through the system to the outbound paperwork. The tracking system will not allow the consolidation of containers into an outbound profile that is not appropriate for the outbound shipment, thus assuring that hazardous waste is not unknowingly mixed in with non-hazardous shipments.

CG Environmental Also manages outbound waste in accordance with the Waste Acceptance Guidance (WAG) and based on the general regulatory category of waste. All waste manifested to CG Environmental as the designated facility will in turn be placed in storage, consolidated, treated, or disposed. The materials will be shipped to off-site TSD facilities with CG Environmental as the generator on outbound manifests. CG Environmental will perform a waste determination on any waste that is generated in-house. An exception to this for 10-Day waste is because CG Environmental is not the designated facility on the inbound manifest and is not a RCRA permitted TSD facility.

Notations on all outbound waste manifests will reflect the appropriate regulatory category. Waste is typically consolidated into larger packages based on the regulatory category. Large quantities of HHW will also be shipped off-site and identified as such on all outbound manifests. Used oil, universal waste, non-hazardous liquids, and solids will also be identified as such on outbound manifests. If waste of different categories are mixed together, the resultant mixture will be managed according to the more stringent category. CESQG waste will be manifested in accordance with the requirements of 40 CFR 262.

If 10-Day Waste packages of the same DOT shipping description are consolidated, CG Environmental will make appropriate notations on the manifest to reflect the new container number and types. This will be noted in Block 14 of the uniform hazardous waste manifest. The notation will be in Block 32 for a continuation sheet. For example, manifest item 9b, line 1 (UN1992, Waste Flammable Liquids, n.o.s. (xylene, acetone), 3, PG II) consists of 80 dm for item 10 and 4,400 gallons for item 11 and is consolidated into a vacuum tanker for subsequent transportation to the designated RCRA Part B TSD facility. The hazardous waste is vacuumed from drum to a tanker at the CG Environmental hazardous waste transfer station. The manifest would be changed to reflect the new number and type of containers. Item 10 would be changed on the manifest to 001 and TT. Additionally, a notation in item 14 would indicate the waste consolidation on behalf of the hazardous waste transfer station. For multiple manifests, a cover manifest will be prepared for transportation purposes only.

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If 10 Day Waste containers with different DOT shipping descriptions are consolidated in a single container, CG Environmental will follow the EPA guidance dated October 30, 1990, and RCRA hot line summaries for manifesting requirements. A copy of the guidance is provided in Appendix DOP-7. This will involve preparation of a new cover manifest, for transportation purposes only. In accordance with 40 CFR 263.10(c), this type of “mixing” requires complying with the generator requirements of 40 CFR 262. CG Environmental interprets this consolidation as only applicable to the manifesting requirements of 40 CFR 262 Subpart B and 40 CFR 262.30 through 33. Additional safeguards for determination of waste compatibility are already addressed throughout this Plan.

5.5 Provisions to Address Handling Ignitable, Reactive, and Incompatible

Wastes CG Environmental will meet requirements for handling Ignitable, Reactive, and Incompatible wastes in accordance with 40 CFR 264.17. CG Environmental takes precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste is separated and protected from sources of ignition or reaction including, but not limited to:

- Open flames;
- Smoking;
- Cutting and welding;
- Hot surfaces;
- Frictional heat;
- Sparks;
- Spontaneous ignition; and,
- Radiant heat.

While ignitable or reactive waste is being handled, CG Environmental confines smoking and open flame to specifically designated locations. “No Smoking” signs are conspicuously placed wherever there is a hazard from ignitable or reactive waste.

CG Environmental also takes precautions to prevent reactions which:

- Generate extreme heat or pressure, fire or explosions, or violent reactions;
- May result in electrocution or sparking due to improper bonding and grounding;
- Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;

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- Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
- Damage the structural integrity of the device or facility; and,
- Through other like means threaten human health or the environment.

Ignitable, reactive, or incompatible wastes are also addressed in section 4.2.2 of the Waste Analysis Plan, in the facility SOP for waste handling, and in the required HAZWOPER training all employees are required to undertake. Bucket testing before consolidation and waste-to-waste compatibility tests are performed to ensure wastes are compatible. These tests serve as documentation of compliance with 40 CFR 264.17.

5.6 Truck and Equipment Cleaning and Decontamination Procedures CG

Environmental typically decontaminates any items used in emergency response activities or routine customer pick-ups at the customer site and adds that material to the customer manifest. However, in the event equipment or tools need decontamination at the Facility the decontamination activities will occur in the wash pad (WP-1), the transload bay (TLB) or on Pad 2 P-2. These locations allow easy collection of any run-off. Small tools may be decontaminated in areas B-1A, B-1B and B-1C inside the containment or on a containment pallet. Tools and equipment will be decontaminated by washing with compatible soap and water using brushes and rags, or for large contamination a hot water Pressure-washer. All decontamination waters will be collected, containerized, labeled, and characterized prior to appropriate off-site disposal.

6.0 Health and Safety, Contingency Response, Inspection and Security Provisions

6.1 Health and Safety Program CG Environmental operates the facility in compliance with a comprehensive Site Health and Safety Program (H&S Program). A copy of the H&S Program is provided as Appendix DOP-8.

The H&S Program sets forth the following items:

- Employee H&S training

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- Site monitoring
- Respiratory protection
- Personnel protection
- Emergency facilities and equipment.

The schedule for H&S Program training for employees is set forth in Appendix DOP-10 of this D&O Plan.

6.2 CONTINGENCY RESPONSE PLAN CG Environmental previously developed a comprehensive Contingency Response Plan, a copy of which is included in Appendix DOP-9 of this D&O Plan.

The Contingency Plan sets for the following items:

- Identification of potential emergency events.
- Implementation of response procedures.
- Notification and reports to internal organizations.
- Notification and reports to external organizations.
- Containment and control activities.
- Emergency event activities.
- Emergency equipment.
- Casualty control.
- Evacuation Plan.
- Post-emergency procedures, including future prevention and recovery.

The schedule for Contingency Plan training for employees is set forth in Appendix DOP-10 of this D&O Plan.

6.3 INSPECTION PLAN (40 CFR 264.15(b)(5)) In accordance with the regulatory requirements set forth in 40 CFR §264.15, CG Environmental has developed this Inspection Plan as an integral component of the Transfer Station D&O Plan for the Facility. The procedures set forth in the Inspection Plan dictate that the Facility follows all requirements of 40 CFR §264.15. The schedule for Inspection Plan training for employees is set forth in the Employee Training Program in Appendix DOP-10 of this D&O Plan. The Inspection Plan itself is provided in Appendix DOP-11 of this D&O Plan.

6.3.1 Description The Inspection Plan is intended to provide a mechanism to prevent and detect system malfunctions, equipment deterioration and operator errors which, if allowed to continue without remedial action, may ultimately lead to a release of hazardous waste

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constituents to the environment or create a threat to human health. The inspection program is designed to provide an early warning of the potential for such events in order that corrective and preventive actions may be taken in a timely manner.

The inspection program is divided into two segments: (1) general Facility inspection and (2) specific process unit inspection. The former focuses on items that apply to Facility-wide operations. Site security, safety and emergency equipment are included under this category.

Qualified individuals assigned the responsibility to detect any unsafe conditions and prevent adverse consequences implement the Inspection Plan. Designated individuals have the training and authority to (1) implement the required inspections, (2) perform necessary evaluations and hazard assessments, and (3) recommend appropriate corrective or remedial actions.

Inspection is performed according to a pre-determined schedule based on knowledge and operational experience with the systems and processes involved. Each inspection item has the content and frequency necessary to alert Facility personnel prior to development of a serious problem. A trained inspector evaluates and assesses each item indicating a potential malfunction, equipment deterioration or operator error through regular observation of the process and procedures. The level of response and its timing are determined by the nature and seriousness of the problem identified, with protection of personnel and the prevention of adverse environmental impact being of paramount concern.

6.3.2 Personnel Qualifications Each inspector is trained and meets the qualifications of the Training Plan, as referenced in Section 7, below. A copy of the Training Plan is included as Appendix DOP-10.

The personnel who normally perform inspection activities are the Operations Manager, Environmental & Safety Manager, Approvals Chemist, Driver (for vehicles, ensures/conducts pre-trip, and operating inspections), and Environmental Specialists. Other personnel may act as an inspector, but they must have the proper technical (education, training, and experience) qualifications as the person who normally performs the inspection. During inspection of the yard, or of areas containing hazardous wastes, the inspector(s) shall wear appropriate protective clothing and equipment.

6.3.3 Hazard Assessment and Evaluation Procedures The inspector must be familiar with the location of the equipment and systems to be inspected and their normal configurations. For any discrepancy observed, the inspector shall determine the potential for personnel injury or for release of hazardous waste constituents, and he/she shall assess the nature and timing of remedial action required. The determination shall consider (1) the location

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and nature of the problem, (2) the presence of secondary containment or control, (3) the amount and type of waste material involved, (4) the potential for human exposure, and (5) the likeliness of waste migration. The inspector shall maintain open lines of communication with the Facility's Emergency Coordinator(s). He must depend on his judgment and advice regarding physical constraints and scope of corrective actions, response timing, interim controls and countermeasures. When an inspection indicates equipment malfunction or deterioration, or any other improper condition, at least the following actions are to be taken as appropriate:

- Assess the situation,
- Determine the corrective/remedial measures needed in response to the situation, including appropriate interim measures.

6.3.4 Inspection Checklist An Inspection Checklist is completed during each inspection. A copy of the Inspection Checklist is provided in Appendix DOP-11.

6.4 Security (40 CFR 270.14(b)(4) and 264.14) The Facility has security provisions in place that are intended to prevent or minimize the possibility for the unknowing or unauthorized entry of persons or livestock into active waste management areas. In general, the site is not open to the public, and entry is limited to authorized personnel, drivers (waste haulers), contractors, vendors, and escorted visitors. The location of the Tulsa Facility is adjacent to industrial and commercial developments which further minimize the potential for public encroachments. Specific security requirements are addressed in the Site Security Plan provided in Appendix DOP-12

7.0 EMPLOYEE TRAINING CG Environmental personnel are provided periodic training in health and safety, contingency response, inspection methodologies, and site security. The CG Environmental training program is presented in Appendix DOP-10.

- Implementation of the Training Program encompasses:
- Identification of the training requirements (for each job).
- Selection of qualified instructors.
- Conducting training.
- Employee testing and performance evaluation

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- Documentation of training. Training Plan components include:
- Scope of training for new personnel.
- Job specific training.
- Training program administration.
- Continued training frequency and content.
- Documentation of training.

Records of employee training are maintained in the administrative offices of CG Environmental for a period of at least three (3) years after the employee leaves the employment of CG Environmental.

8.0 CLOSURE AND FINANCIAL ASSURANCE

A closure plan for the CG Environmental Transfer Facility is provided in Appendix DOP-14. Demonstration of Financial Assurance is provided in Appendix DOP-15.

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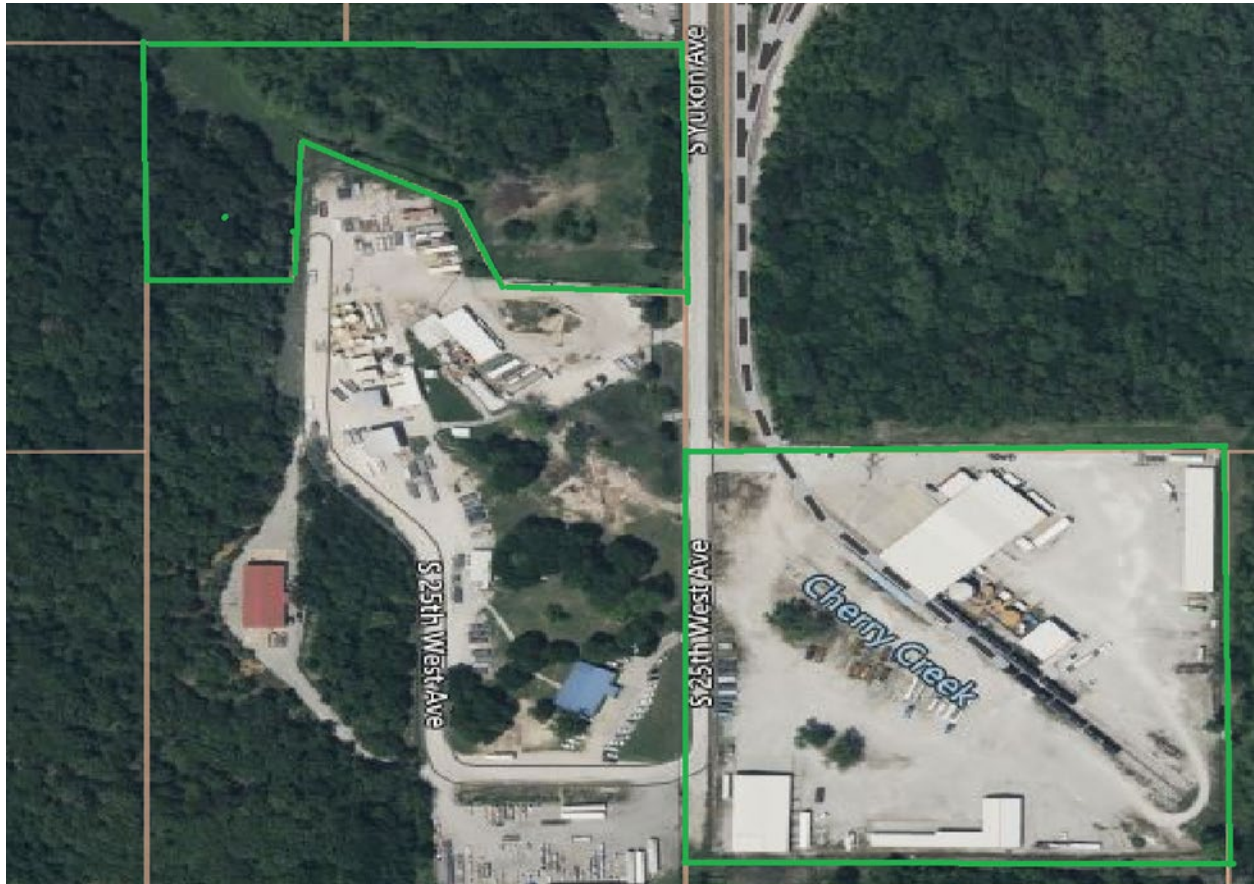


Sections Highlighted below in green indicate CG Environmental owned properties:

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