# REVISED
# DEVELOPMENT & OPERATIONS PLAN

# Development and Operations Plan

For The

# Environmental Management, Inc.
# Transfer Station
Guthrie, OK

## - Renewal Application -

March 15, 2018

See Revision Log for Current Dates

**Environmental Management, Inc.**
**PO Box 700**
**5200 Northeast Highway 33**
**Guthrie, OK 73044**

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# Revision Log

| Revision No. | Effective Date | Prepared By | Description of Revisions | Affected Pages |
|---|---|---|---|---|
| Rev. 0 | 3/15/18 | EMI | N/A | N/A |
| Rev. 1 | 6/1/18 | EMI - JN | Incorporating inadvertently omitted information regarding facility inspections, Attachment 14 revised to include inspection schedule, Attachment 12 replaced with current Used Oil Plan | TOC; 37-40; subsequent pg #s shifted |
| Rev. 2 | 5/2/19 | EMI - JN | Changes in response to the Technical Review Notice of Deficiency. See letter in Correspondence section. | All and certain attachments |

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# TABLE OF CONTENTS

# ATTACHMENTS

## ATTACHMENTS (cont.)

# A. INTRODUCTION

## A-1 BACKGROUND

EMI began providing waste management services to the business community in 1983. With the construction of the Guthrie, Oklahoma, Transfer Station Facility in 1988, EMI was able to expand its waste management services to include waste transport, in conjunction with consolidating waste from various generators, to ensure compliant management at Federally- and State-permitted off-site waste disposal and recycling facilities. EMI's motto *"Environmental Management, for an environment we can both live with today & tomorrow,"* succinctly describes the corporate mission and the end objective to which its staff works toward on a daily basis. EMI provides a valuable service to the business sector, and in turn to the people of Oklahoma. People who depend on industry to promote economic growth, but with the expectation that it does so in a manner that preserves the quality of the existing natural resources within the State.

EMI provides waste management services to assist the regional commercial/industrial business community in its efforts to operate within the bounds of Federally- and state-mandated regulatory rules and laws. EMI provides its customers with waste management services, including waste profiling, packaging, labeling, as well as transportation of wastes or materials to a permitted waste disposal site or recycling facility. As a permitted Transfer Station Facility, EMI handles RCRA-regulated Hazardous Wastes, Nonhazardous Solid Wastes, Nonhazardous Industrial Wastes (NHIW), Recyclables, Used Oil, Treated Medical Waste, Universal Waste and Asbestos-containing Materials. No wastes or materials are disposed of at the EMI site, rather all materials received at the EMI Transfer Station Facility are temporarily staged and then transported off-site to a permitted waste disposal site or material recycling facility.

## A-2 PURPOSE & NEED

The Oklahoma Department of Environmental Quality (ODEQ) previously provided authorization for the operation of EMI's Transfer Station located in Guthrie, Oklahoma on February 1, 2001, per approval No. 982293334-TS (see Attachment 1). This document entitled, "*Development and Operations Plan for the Environmental Management Inc. Transfer Station, Guthrie, OK - Renewal Application* -," shall herein be referred to as the "Plan". It has been prepared as a response to ODEQ's request to update the existing EMI Facility Development and Operations Plan, to address the new regulatory requirements cited within OAC 252:205-15 Hazardous Waste Management: Transfer Stations, effective 9/15/2016, enabling the continued operation of the EMI Transfer Station Facility in its current capacity.

## A-3 DOCUMENT ORGANIZATION

Commencing in Section 2.0, this document will address the requirements in the general sequence, as they are listed in OAC 252:205-15 Hazardous Waste Management: Transfer Stations, for ease of tracking compliance with the cited requirements. The Plan provides the cited requirements in bold

text, immediately followed by EMI's responses to the requirements in standard text. In addition, Attachment 5 of this document includes the DEQ Transfer Station Application Review checklist and the Processing Facilities Application Review Checklist, with page number citations associated with the requested information locations for your convenience.

EMI has not altered its operations from that described in the D&O Plan currently on file with ODEQ. Although EMI processes and operations have remained the same, the information contained in the existing Plan does not readily transfer in its current format, to the structure identified in OAC 252:205-15. In addition, it appears that revised pages of technical descriptions transmitted to ODEQ by EMI may have inadvertently been left out of the revised 2001 D&O Plan, as some of the correspondence documenting the revisions does not appear on the ODEQ webpage for download. As such, for purposes of clarity and completeness, EMI responses to ODEQ requirements cited in OAC 252:205-15 will be provided in their entirety in plain text beneath each cited ODEQ requirement. The text used to develop each response will be extracted from the approved 2001 D&O Plan and correspondence between EMI and ODEQ, regarding technical clarifications and/or Plan modifications.

## A-4 SITE NAME, ADDRESS, LEGAL

### Site Name

Environmental Management, Inc. (EMI)

> Note: The Section below, **"Type of Site"**, has been modified to incorporate language used in the 2001 D&O Plan, in conjunction with language regarding the EMI facility, as presented on the DEQ webpage http://www.deq.state.ok.us/lpdnew/hwpermits/EMI.htm.

### Type of Site

Environmental Management, Inc. is a 10-day Transfer Facility and Transfer Station with a DEQ-approved Design and Operations Plan in accordance with Oklahoma Administrative Code 252:205-15-1. The Transfer Station Facility is physically located 2.5 miles east of I-35 on Hwy 33, within the City of Guthrie, Oklahoma. EMI has owned and operated the Transfer Station Facility at its current location since 1988.

The company's services include emergency response, site remediation, and accepting hazardous and solid wastes for processing/consolidation, and then compiling data/paperwork necessary to arrange for compliant transport of these wastes to final disposal/recycling facilities. All waste received at the EMI Transfer Station Facility is shipped off-site to an appropriate disposal facility. When handling hazardous wastes from Large and Small Quantity Generators, EMI may store these wastes temporarily (less than 10 days) at its Facility. In addition, the company receives Hazardous Wastes from Very Small Quantity Generators for the purposes of consolidation and/or processing, as well as arranging for compliant transport/disposal. EMI is also a multipurpose hazardous material brokerage and service company, which receives various excess chemical products from outside vendors, and gives them a second chance at being utilized for their intended purpose, via the EMI Product Distribution program.

### Corporate/Site Location

| Physical Address | Mailing Address |
|---|---|
| 5200 NE Highway 33 | PO Box 700 |
| Guthrie, OK 73044 | Guthrie, OK 73044-0700 |
| Telephone 405-282-8510 | |

A Map illustrating the location of the EMI Facility is presented as Figure 1.

**Legal Land Description**

*A Part of the Northeast Quarter of Section 1, Township 16 North, Range 2 West described as follows: Beginning at the Southwest corner of the Northeast quarter of Section 1, thence North 826 feet for place of beginning, thence East 653 feet to the West right-of-way line of S.H. #33, thence following the West right-of-way line of said Highway in a Northeasterly direction 996.8 feet to a pint, thence West 434 feet, thence North 942 feet to the North line of the Northeast Quarter of Section 1, Township 16 North, Range 2 West thence West 816 feet to the Northwest corner of the Northeast Quarter of Section 1, thence South to a place of beginning containing 30 acres more or less.*

The Warranty Deed for this property is provided as Attachment 6.

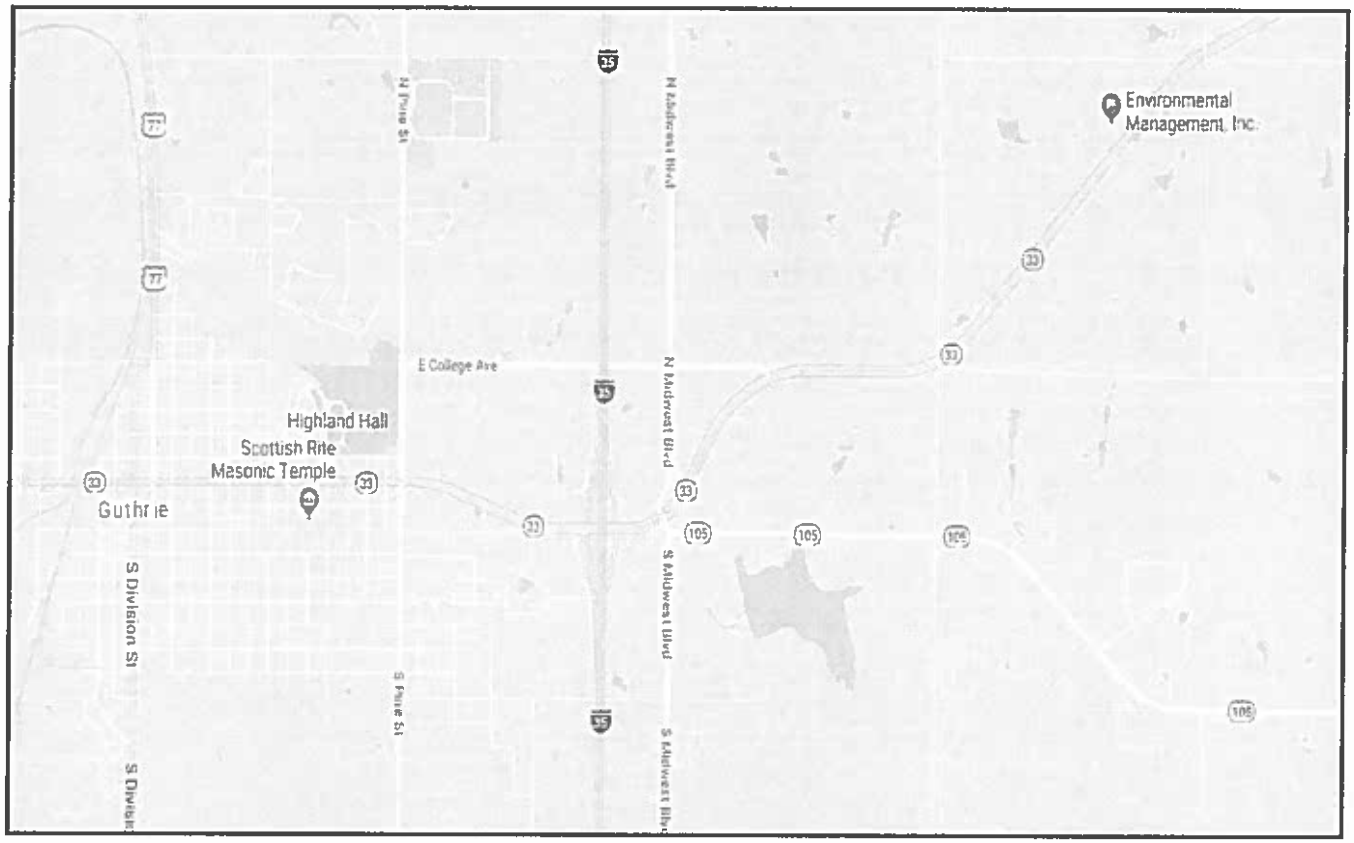


**Fig. 1** Site Location Map.

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# 1.0 APPLICABILITY AND CONSIDERATION OF OTHER LAWS

## 1.1 OAC 252:205-1-2 Definitions

'Transfer Facility' "…any transportation-related facility, including loading docks, parking areas, storage areas and other areas where shipments of hazardous waste are held during the normal course of transportation."

'Transfer Station' "…any transfer facility where hazardous waste is transferred from one container or tank to another or where hazardous waste in separate containers or tanks is combined."

Operations conducted at the EMI facility meet the definition of a Transfer Facility and Transfer Station, per the definitions cited in OAC 252:205-1-2.

## 1.2 OAC 252:205-15(a) Definitions

For the Purposes of Subchapter 15, 'Plan' means the Development and Operations Plan described in 252:205-15-2, unless the context clearly indicates otherwise.

This document entitled, "Development and Operations Plan for the Environmental Management Inc. Transfer Station, Guthrie, OK - Renewal Application -," shall herein be referred to as the "Plan".

## 1.3 OAC 252:205-15(b) Types of Waste Handled

The owner/operator of a Transfer Station, as defined by 252:205-1-2, which handles hazardous waste or both hazardous and solid wastes must comply with this Subchapter.

EMI is a transfer facility as defined by 252:205-1-2 and handles both hazardous and solid wastes. These wastes are regulated under the purview of RCRA, and the State of Oklahoma.

Details associated with the waste types, their origin, and how they are handled at the EMI Transfer Station is further discussed in Section 2.0 of this Plan.

## 1.4 OAC 252:205-15-1(c) Solid Waste Permits

The owner/operator of a hazardous waste Transfer Station operating or proposing to operate under an approved Plan which includes compliance with 252:205-15-2(c) is not subject to solid waste permitting rules.

EMI has developed this Plan to demonstrate compliance with 252:205-15-2(c) Applicable Solid Waste Regulations (see Section 2.3 of this Plan). Thus, upon renewal by DEQ, the EMI Transfer Station will continue its current operations without becoming subject to solid waste permitting rules.

## 1.5 OAC 252:205-15-1(d) RCRA Permits

The rules in this Subchapter do not supersede any obligations to obtain a hazardous waste permit.

EMI operates under the EPA Facility ID No. OKD982293334 and has assessed its need to obtain a RCRA hazardous waste permit, given its operational activities:

1) No waste is disposed of at the EMI Transfer Station Facility,

2) EMI is permitted by the State to manage industrial solid waste, and accepts hazardous waste for consolidation and storage at its facility only from Very Small Quantity Generators (VSQG) regulated under 40 CFR 262.14,

3) EMI handles and transports recycled materials,

4) EMI classifies itself as a Large Quantity Generator per 40 CFR 262.17,

5) EMI conducts elementary neutralization as defined in Section 260.10

6) EMI acts as a Hazardous Waste Transporter storing shipments ≤ 10 days,

7) EMI adds absorbents at the time waste is first added to containers as defined,

8) EMI is a Universal Waste Handler / Transporter,

As EMI conducts its activities within the bounds of the exclusionary criteria cited below, it has been concluded that the EMI Facility *does not require* a RCRA permit.

### 1.5.1 Exclusions per 40 CFR 264

The conditions requiring a RCRA Treatment, Storage and Disposal (TSD) permit are outlined in 40 CFR 264.1 Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities. This part cites exclusions to the requirement for a RCRA TSD permit that are directly applicable to specific types of work conducted at the EMI Transfer Station Facility.

Per the citation 40 CFR 264.1(g) "The requirements of this part do not apply to:

(1) The owner or operator of a facility permitted, licensed, or registered by a State to manage municipal or industrial solid waste, if the only hazardous waste the facility treats, stores, or disposes of is excluded from regulation under this part by Section 262.14 of this chapter.

(2) The owner or operator of a facility managing recyclable materials described in Section 261.6 (a)(2), (3), and (4) of this chapter (except to the extent they are referred to in Part 279 or subparts C, F, G, or H of part 266 of this chapter).

(3) A generator accumulating waste on site in compliance with Section Section 262.14...262.17 of this chapter.

(6) The owner or operator of an elementary neutralization unit as defined in Section 260.10 of this chapter, provided that if the owner or operator is diluting hazardous ignitable (D001) wastes...must comply with the requirements set out in Section 264.17(b).

(8)(i) Except as provided in paragraph (g)(8)(ii) of this section, a person engaged in treatment or containment activities during immediate response to any of the following situations:

(A) A discharge of hazardous waste;

(B) An imminent and substantial threat of a discharge of hazardous waste;

(C) A discharge of a material which when discharged becomes a hazardous waste.

(D) An immediate threat to human health public safety, property, or the environment from the known or suspected presence of military munitions, other explosive material, or an explosive device, as determined by an explosive or munitions emergency response specialist as defined in 40 CFR 260.10.

(8)(ii) An owner or operator of a facility otherwise regulated by this part must comply with all applicable requirements of subparts C and D.

(9) A transporter storing manifested shipments of hazardous waste in containers meeting the requirements of 40 CFR 262.30 at a transfer facility for a period of ten days or less.

(10) The addition of absorbent materials to waste in a container (as defined in 40 CFR 260.10) or the addition of waste absorbent material in a container, provided that these actions occur at the time waste is first placed in the container; and Section Section 264.17(b), 264.171, and 264.172 are complied with.

(11) Universal waste handlers and universal waste transporters (as defined in 40 CFR 260.10) handling the wastes listed below. These handlers are subject to regulation under 40 CFR part 273, when handling the below listed universal wastes,
(i) Batteries as described in 40 CFR 273.2;
(ii) Pesticides as described in Section 273.3 of this chapter;
(iii) Mercury-containing equipment as described in Section 273.4 of this chapter; and
(iv) Lamps as described in Section 273.5 of this chapter."

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# 2.0 DEVELOPMENT AND OPERATIONS PLAN

## 2.1 OAC 252:205-15-2(a) Plan Required

"No person may construct or operate a hazardous waste Transfer Station without a Plan approved by DEQ."

This Plan is anticipated to constitute an agreement between ODEQ and EMI, regarding the continued operation of the EMI Transfer Station Facility.

## 2.2 OAC 252:205-15-2(b) Content

"The owner/operator of a Transfer Station shall identify and discuss all of the hazardous wastes which may be managed at the Transfer Station and the handling of any solid wastes-or other wastes claimed by the owner/operator to be unregulated or exempt. The following shall be submitted: (1) Engineering plans…provisions of 40 CFR 262.34."

The required topics of discussion, as defined in 252:205-15-2(b) Content, is addressed in subsections that follow.

## 2.2.1 OAC 252:205-15-2(b)(1) Engineering Plans & Site Description

"Engineering plans for the construction design, and a detailed description of all buildings, ramps, on-site roads, waste transfer and holding areas, and equipment used on-site."

### 2.2.1.1 BACKGROUND

No changes have been made to the EMI Transfer Station facility site, nor its operations, since June 2013, when EMI provided ODEQ with an amended copy of EMI's Contingency Plan, Used Oil Analysis Plan, as well as a Modified Description of Dock #1.

Information to address this requirement has been extracted from various sections within the existing 2001 EMI D&O Plan, along with information providing modifications to the 2001 D&O Plan, as well as additional technical clarifications addressed within official correspondence between EMI and ODEQ. The data in these memos and the information within the previously submitted 2001 D&O Plan, has been consolidated and presented in its entirety within the sections below, to provide a clearer and more concise facility description.

Additionally, any regulatory citations referred to in the existing 2001 EMI D&O Plan that have become obsolete due to rule promulgation since 2001, have been updated to the extent practicable in the sections below. Most notably, the reference to VSQG vs CESQG and the various regulatory citations associated with the States' adoption of the EPA 'Hazardous Waste Generator Regulations', promulgated November 28, 2016, have been updated.

Lastly, EMI correspondence to DEQ in Nov 2012 contained but a partial section of the EMI Facility surveyors map, to illustrate the location of the Nonhazardous Drum Staging Structure. As such, a copy of all maps, including a newly-generated EMI Transfer Station Facility Site Survey map, has been provided as Attachment 7.

### 2.2.1.2 SITE DESIGN

The EMI Transfer Facility Station is located in Logan County, Oklahoma. Accessed via Hwy 33, the site is located approximately 2.5 miles east of Interstate 35. A general site location map has been presented above as Figure 1.

The Facility is comprised of approximately 30 acres. The majority of the property is secured by a 4-strand barbed wire fence four feet in height and is lined with trees. The property line adjacent to Highway 33 is established by 3-rail white vinyl fencing. There is only one entrance / exit to the facility, which is secured by a 25-foot-wide electrically-operated steel white gate.

The property was designed with three storm water catch basins located downgradient in the southwestern corner of the site. These catch basins are located on the western-most edge of the property and all working areas of the property are situated to the east and up gradient of the catch basins. Prior to development the facility grounds were graded. Taking into account the natural slope and curvature of the landscape, the facility has been designed and is operated in such a manner, as to channel and retain storm water runoff in these catch basins, preventing it from migrating off-site. There has been no occurrence of off-site migration of contaminated storm water in the history of operations at the EMI facility.

All areas of the property, actively utilized by waste transport trucks, service vehicles, heavy equipment and/or staff automobiles, have been constructed with a minimum roadbed of 6" of crusher rock limestone applied over compacted heavy red clay.

All buildings located on the EMI Transfer Station Facility are constructed of steel I-beam framing with attached metal roofs.

Waste storage and waste bulking operations are conducted in areas with concrete flooring and curbing to provide for spill containment, spill detection, and ease of routine housekeeping.

### 2.2.1.3 FACILITY & WASTE PROCESSING AREA DESCRIPTIONS

The EMI Transfer Station has the following Facilities and Waste Processing Areas:

Building 1 – Office Facilities

Building 2 – Maintenance Shop

Dock 1 – Waste Staging

Building 3 – Mix Room / Truck Barn / Dock 2

Nonhazardous Waste Storage Area

Building 4 – Equipment / File Storage Area

Building 5 – Southern Bay / Central Bay / Northern Bay / Dock 3

A schematic drawing illustrating the relation of the structures to one another within the EMI Facility, inclusive of the Waste Processing Areas is provided below as Figure 2. Individual maps depicting each structure are provided with the associated descriptive text that follows. Additional facility schematic drawings are provided in Attachment 8.

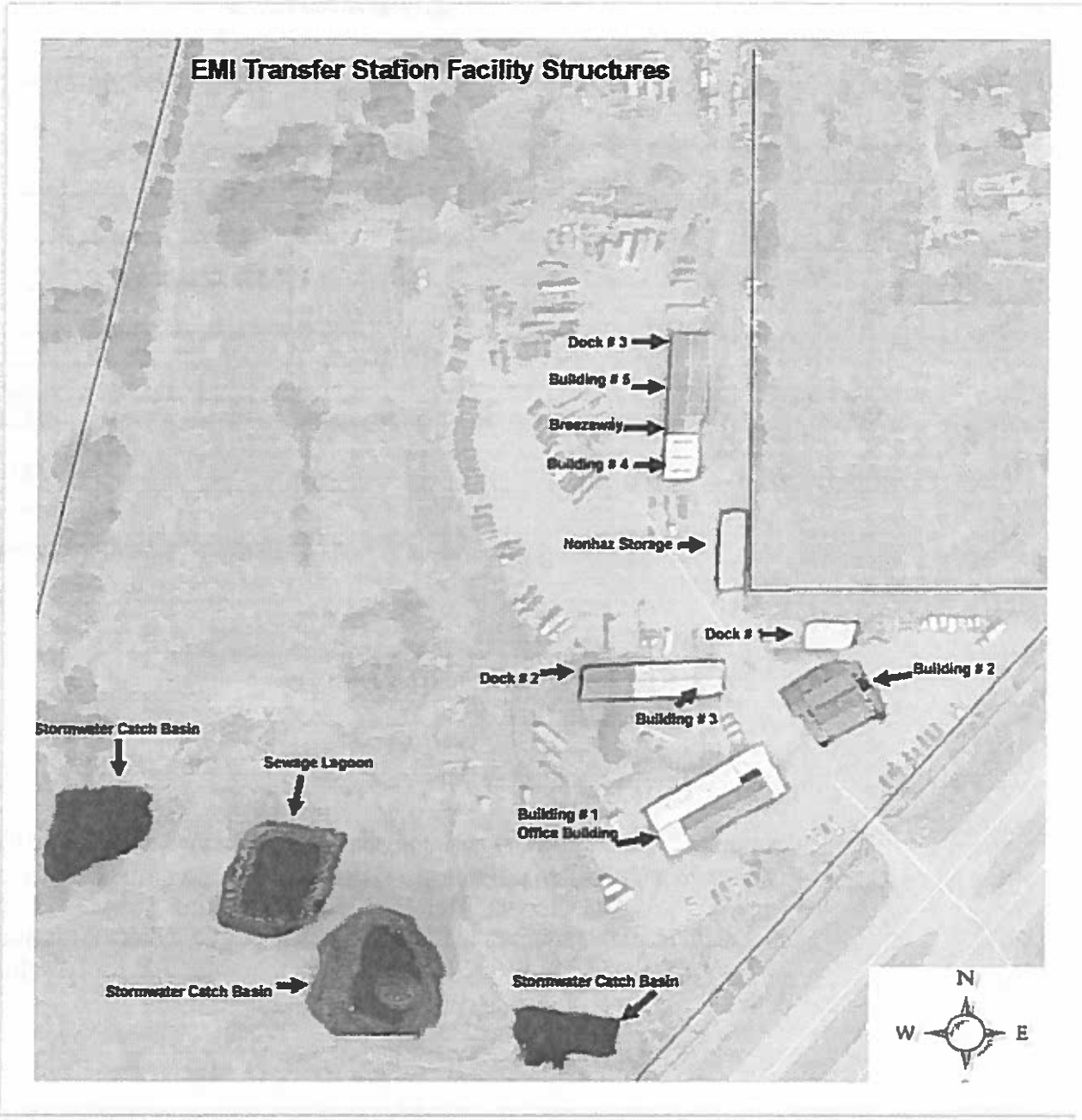


**Fig. 2** EMI Transfer Station Facility Buildings and Structures.

### 2.2.1.4 BUILDING 1

Building 1 is a two-story Office Building. Most of the EMI staff have designated work offices areas within the structure. The building also houses the facility reception desk (where visitors are received and logged in/out), the facility Training Room, a personnel Break Room, and areas for Office Materials & Records Storage (see Figures 3 and 4).

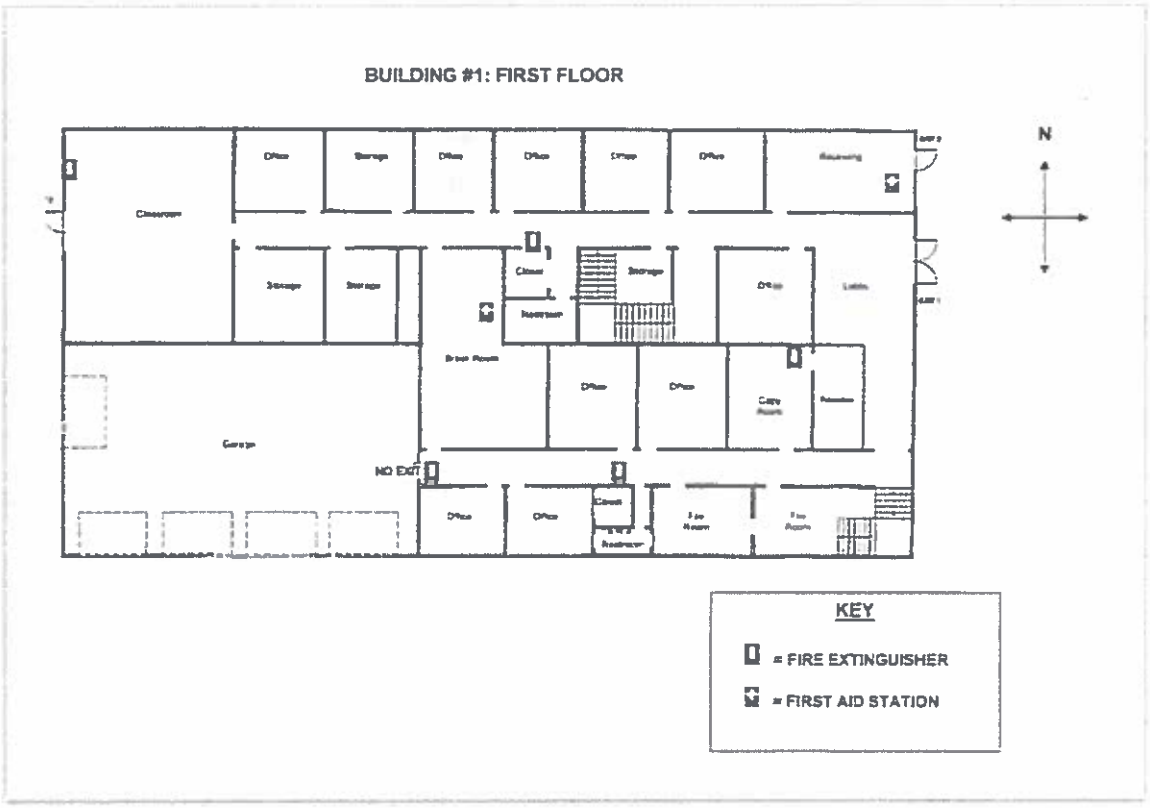


**Fig. 3** Building 1 – Office Building, First Floor.

### 2.2.1.5 BUILDING 2

Building 2 is a single-story structure used primarily for servicing the EMI vehicle fleet. The Maintenance Shop provides an Office Area, Restroom Facilities, a Fabrication Area, and a Vehicle Service Area (including the Vehicle Service Pit). Only Used Oil, and an incidental amount of solid wastes, such as a very limited quantity of empty aerosol cans that are punctured and placed in the rolloff bin for recycling are generated at this facility (see Figure 5).

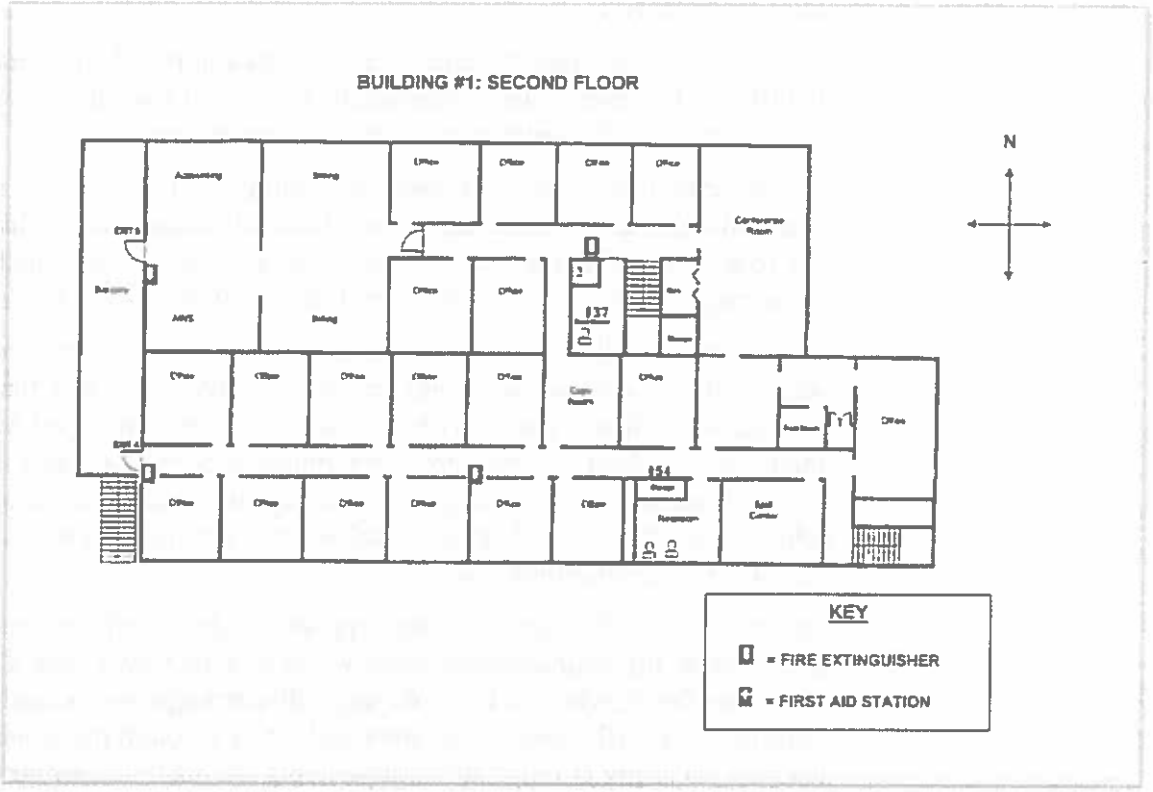


**Fig. 4** Building 1 – Office Building, Second Floor.

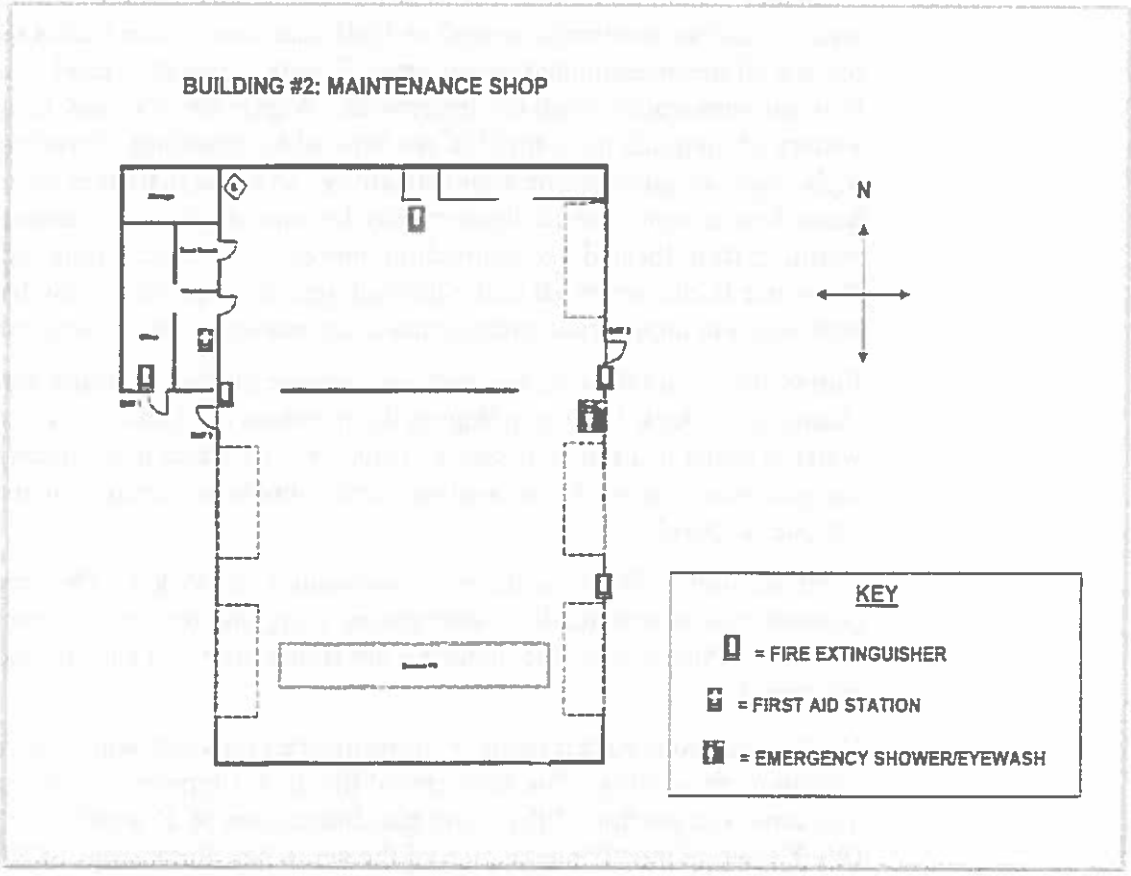


**Fig. 5** Building 2 – Maintenance Shop / Vehicle Fleet Service Area.

### 2.2.1.6 DOCK 1

Dock 1 is a stand-alone structure that is located north of Building 2. It covers an area of 110' x 30'. Dock 1 was constructed using 6" of reinforced concrete and is surrounded by a 6" containment curbing. See Figure 6.

The east end of the Dock 1 is used for loading and unloading of drums from used oil transport vehicles. A steel roof covers the easternmost 60' of the dock. Under the roof sets four tanks, which are used for the separation of oil and water, and temporary Used Oil storage. Adjacent to Dock 1 sets Tank #3, which holds nonhazardous wash water.

Used oil principally in 55 gallon drums is offloaded at the east end of Dock 1 and pumped into one of two oil/water separator (Tanks #4 or #7), that allow for simple separation of oil and water. The separated oil layer is pumped from Tanks #4 and #7 to one of two used oil storage tanks for temporary holding (Tanks #12 and #13), while off-site transportation is arranged with a registered used oil transporter. The used oil is held for <35 days from date of arrival at EMI, inclusive of the time it takes to conduct the oil/water separation process.

The water layer from the oil/water separator tanks is screened and pumped to an above-ground tank, the nonhazardous wash water storage sank (Tank #3), located on the west end of the Dock, where it is stored until off-site shipment is made to a local landfill for solidification. All waste is characterized either through the generator knowledge or analysis, ensuring appropriate arrangements are made for proper off-site disposal.

The westernmost 50' of Dock 1 has no roof and is utilized as a tanker and equipment wash and decontamination area. EMI trucks and equipment that have been in contact with hazardous materials, as well as EMI customer tanker trucks sent to EMI for clean out are all decontaminated in this area. Plastic sheeting is used to cover the dock prior to waste removal or clean out operations. Waste removal may be accomplished by a variety of methods including but not limited to: pumping, shoveling, sweeping, use of high-pressure spray washers and steaming. In some instances cleaning with non-hazardous aqueous-based cleaners may be conducted. All materials, including rinsate, resulting from these decontamination operations is either drummed or sent to Tank #3. All waste is characterized either through generator process knowledge or laboratory analysis, and appropriate arrangements are made for proper off-site disposal.

Empty drums are decontaminated with the use of high-pressure spray washers or steam cleaning on Dock 1. Depending on the previous contents of the container, the wash water is either drummed or sent to Tank #3. All waste is characterized either through the generator knowledge or analysis, and appropriate arrangements are made for proper off-site disposal.

Nonhazardous VSQG wastes are consolidated on Dock 1. They are emptied into a portable mix station made of steel plates, using the bucket of a track hoe to mix the material. Once mixed, the materials are transferred to a rolloff box staged to the south of Dock 1.

Dock 1 was constructed using 6" of reinforced concrete and is surrounded by a 6" containment curbing. The west end of the dock supports a T-shaped containment sump. The cross bar portion of the sump has dimensions of 2' width x 20' length x 1' depth (40 $ft^3$), while the "I" bar section of the sump has dimensions of 2' width x 20' length x 2' depth (80 $ft^3$). This sump provides approximately 900 gallons of secondary containment (120 $ft^3$ x 7.48 gal). The sump, as well as the dock surface, are inspected

daily and kept clean to avoid contamination of precipitation that may collect in the sump. Should precipitation collect in the sump, and remain after 72 hours, it is visually inspected for signs of contamination such as oily sheen or discoloration. If there are no signs of contamination, the water is pumped into the sewage lagoon. No process water is allowed outside of secondary containment and no process water is discharged or disposed on site.

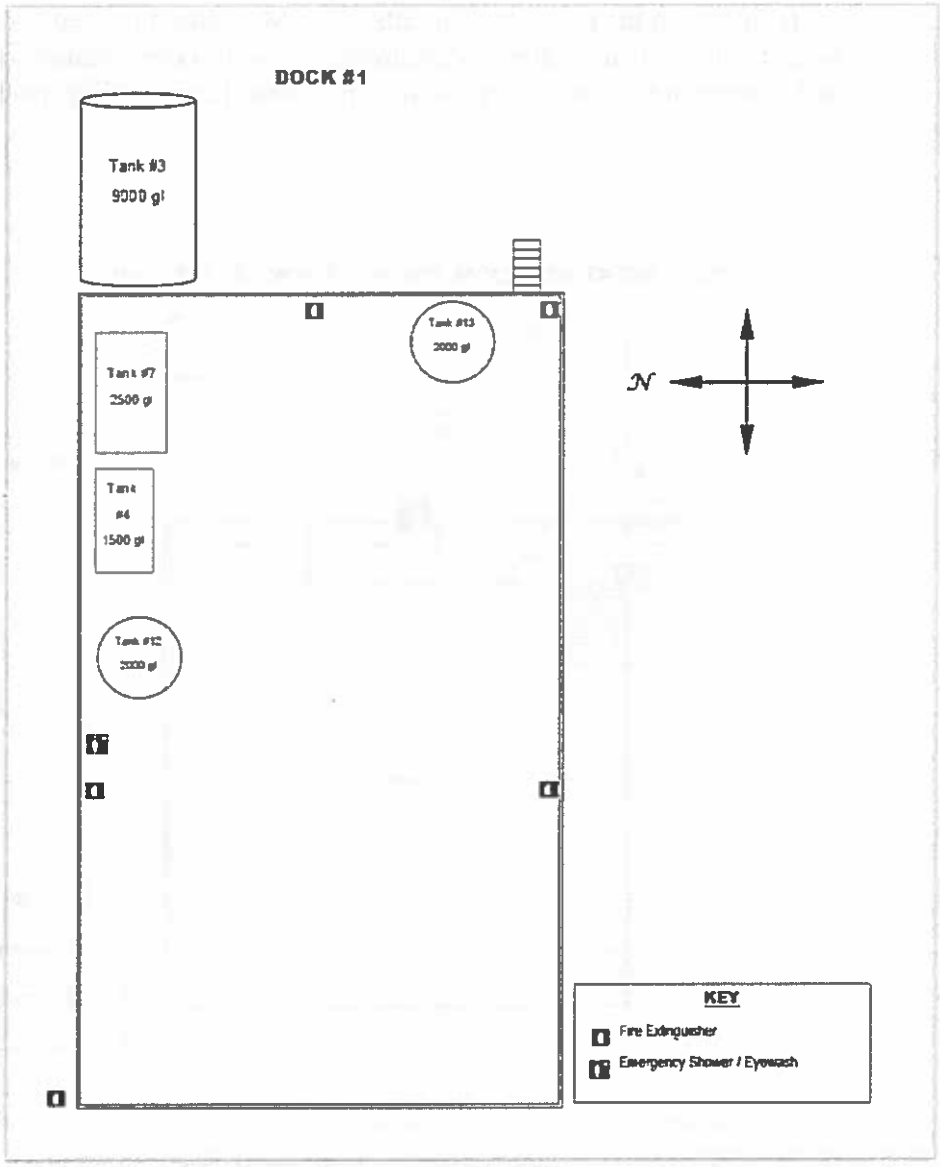


**Fig. 6** Dock 1 – Material Handling / Equipment Decontamination

### 2.2.1.7 BUILDING 3

This building is a 160' x 40' structure used for equipment storage, supply storage, a personnel change area, and waste storage / processing. It is divided roughly into four operation areas, specifically known as the Mix Room (inclusive of the Mix Pit)/Personnel Change Area/Showers/Restroom, Materials Storage Room/ Truck Barn, and Dock 2.

## Mix Room

The east end of Building 3 is designated as the Mix Room (Figure 7). This 30' x 40' area is used to process VSQG wastes and houses the Facility's Satellite Accumulation Area. The Mix Room is a completely enclosed structure with a concrete floor that is surrounded by a minimum of 4" curbing. As a result, the room and its contents are protected from the outdoor elements. The Mix Room is used for the stabilization, solidification, deactivation, neutralization, and/or consolidation of VSQG Hazardous and Nonhazardous wastes, as well as for re-packaging of lab-packs.

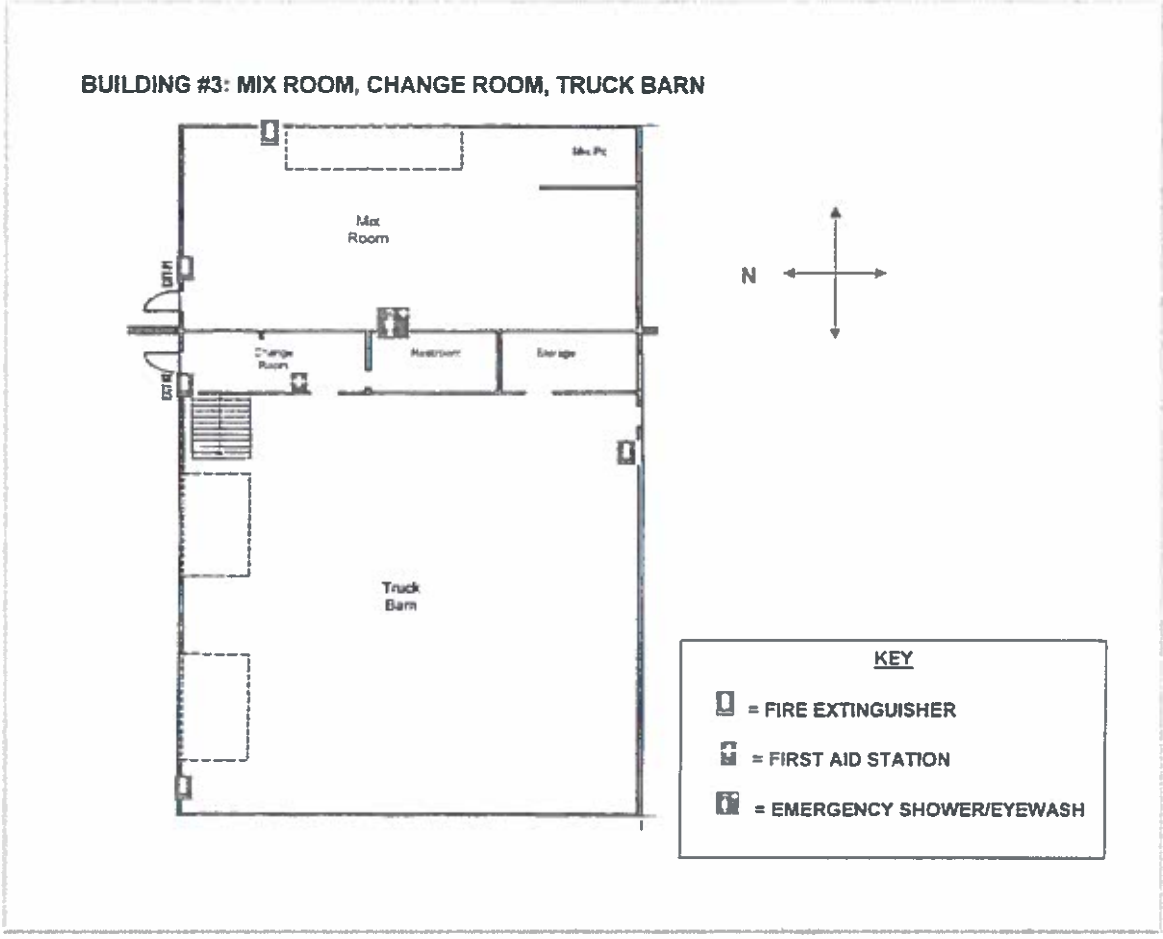


**Fig. 7** Building 3 - Mix Room / Personnel Change Room / Storage / Truck Barn.

In the southeast corner of the Mix Room there is an area 10' x 10' with concrete walls surrounding three sides and the floor sloping downward approximately 1' from north to south to form a lower elevation, known as the 'Mix Pit'. The Mix Pit is occasionally used to solidify nonhazardous liquids.

Individuals are not allowed to work alone in this area while any waste processing activities are taking place. All personnel with the potential to work in this area are issued cellular telephones and are required to carry them while on duty. Access to

facility communications and alarms is immediately adjacent to this area in the Personnel Change Room / Showers / Restroom area.

The consolidated drums are managed as EMI-generated Satellite Accumulation drums, and remain in the Mix Room. Within three days of becoming full, the consolidated VSQG Hazardous wastes are moved to Dock 2, where they are now considered EMI's LQG Hazardous Wastes with a staging limit of ≤90 days.

**Personnel Change Room / Showers / Restroom**

Adjacent to the Mix Room is a section of Building 3 with an area 24' x 9', known as the Personnel Change Room. It roofed with a concrete floor. Internal walled-partitions separate this area into 2 workspaces consisting of a Personnel Change Room and a Restroom (Figure 7). The Personnel Change Room is equipped with storage shelves and two individual personal showers. This area has a telephone connected to the facility communications system and a keypad for the alarm system which are immediately available to personnel working in the Mix Room.

**Materials Storage Room / Truck Barn**

Adjacent to the Personnel Change Room is the Materials Storage Room and Truck Barn (Figure 7). The Storage Room has an area of 16' x 9' and is currently used to store EMI job supplies. The Truck Barn comprises an area of 40' x 60' and has two double-car overhead doors to allow ease of equipment access. The Truck Barn is used to store mobile equipment such as a skid-steer, loaders, etc. It is also used to provide temporary protection of trucks, vehicles, and equipment from damage during severe weather.

**Dock 2**

The west end of Building 3, identified as Dock 2. This dock has an area of 40' x 60', has a deck that is constructed of 6" of reinforced concrete, and has a 6" concrete containment curb along its southern, western, and northern perimeters (see Figure 8). The dock has a steel roof, solid wall construction on the east, and has open-walled construction on the north, south, and west sides. Entry to the dock is facilitated by a 10' x 20' concrete access ramp on the northeast corner.

An 11' x 2' x 2' sump is located in the middle of the dock, providing approximately 330 gallons of secondary containment. All of the floor areas on this dock slope to this sump. Should precipitation collect in the sump, and remain after 72 hours, it is vacuumed out, containerized, and analyzed to ensure proper characterization and disposal.

Dock 2 is used for storage of EMI's LQG hazardous waste (≤90 day) and temporary storage of Universal Wastes (e.g., batteries) and VSQG wastes. Containers with different Hazard Classifications are separated by a minimum of three feet of aisle. Additionally, incompatible wastes are stored as far apart as possible. The EMI Waste and Materials Information Management System, enables the staff to ensure appropriate

physical separation of waste containers by waste classification. This prevents co-mingling between incompatible waste types.

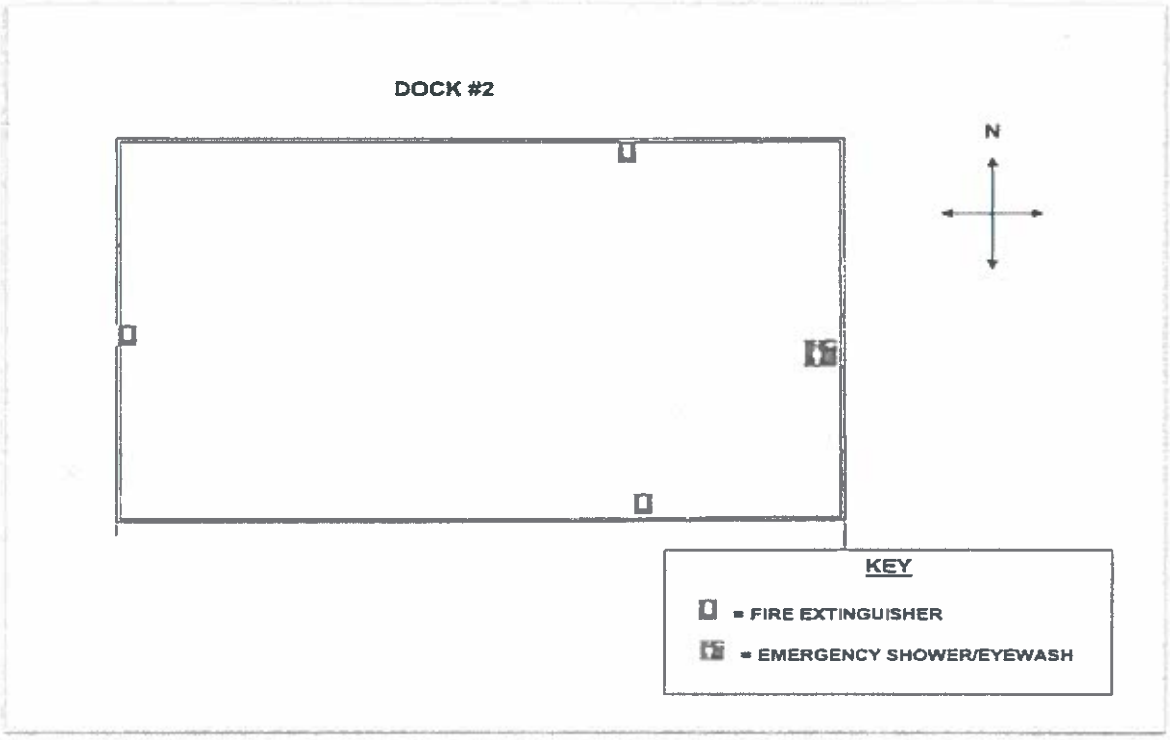


**Fig. 8** Building 3 – Dock 2.

Adjacent to the western end of Dock 2 sets a waste transport van trailer. SQG and Non-EMI LQG manifested hazardous waste arrives at the EMI Transfer Station Facility (e.g. waste for which EMI is acting only as the waste transporter). Once the waste containers are checked, verified, and sorted they are immediately loaded onto the van trailer planned to be utilized for in-transit delivery. All DOT regulations, including those for appropriate waste transport, segregation and the use of DOT 'shippable' containers are complied with per 40 CFR 172-179, while arrangements are made to ensure safe transport of all wastes to an appropriately permitted disposal facility. If one of these containers is subsequently found to be leaking, they would be moved back onto Dock 2 in order be transferred to a new container or overpacked and then returned to the van trailer.

### 2.2.1.8 NONHAZARDOUS WASTE STAGING AREA

The Nonhazardous Drum Staging Area is comprised of a monolithic pour concrete pad 5" thick with fiber mesh (Figure 9). It has dimensions of 100' x 30' and has a 6" concrete curbing along the north, south, and east sides, with a 10' x 100' access ramp on the west. The west side is an entry point with a slightly sloped ramp. The steel structure has a steel northern wall, with a chain-link on the eastern side. The southern and western faces of the pad are open to facilitate ease of container movement. The steel roof is single sloping to the east.

This pad is used to stage VSQG, SQG, and LQG Nonhazardous wastes.

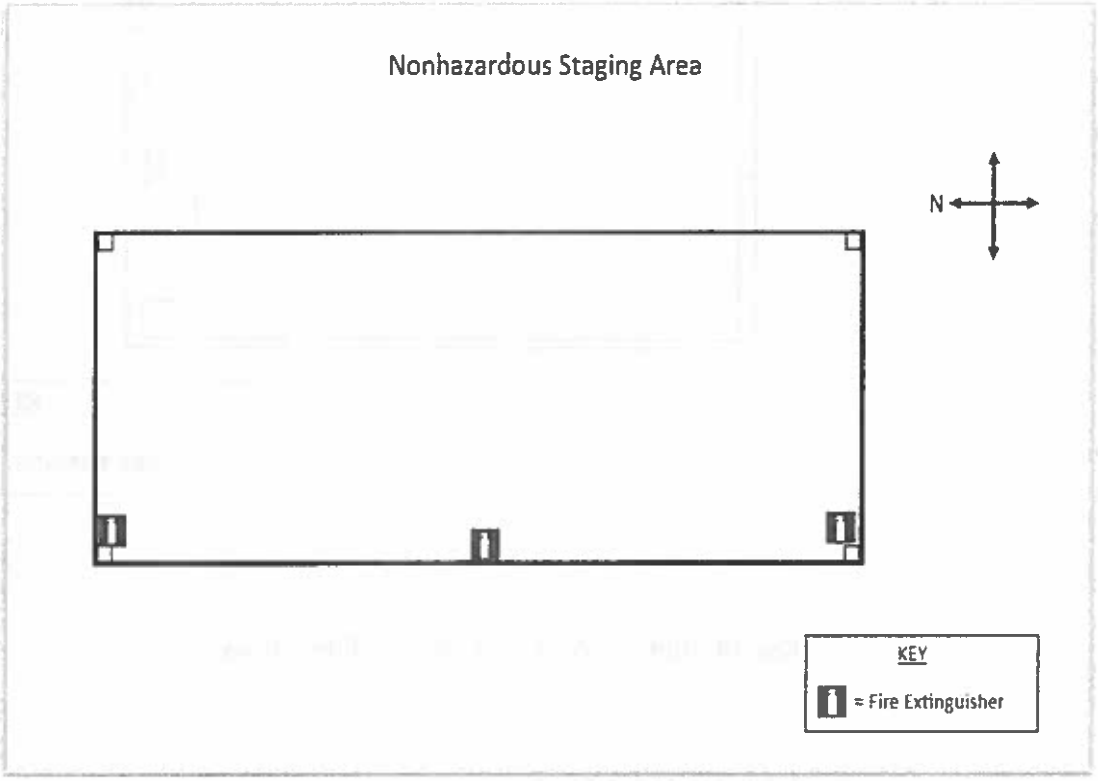


**Fig. 9** Nonhazardous Staging Area.

### 2.2.1.9 BUILDING 4

Building 4 is a 60' x 40' metal structure. It is completely enclosed with a concrete floor. It is used to store client-specific spill response equipment and archived paper files (see Figure 10).

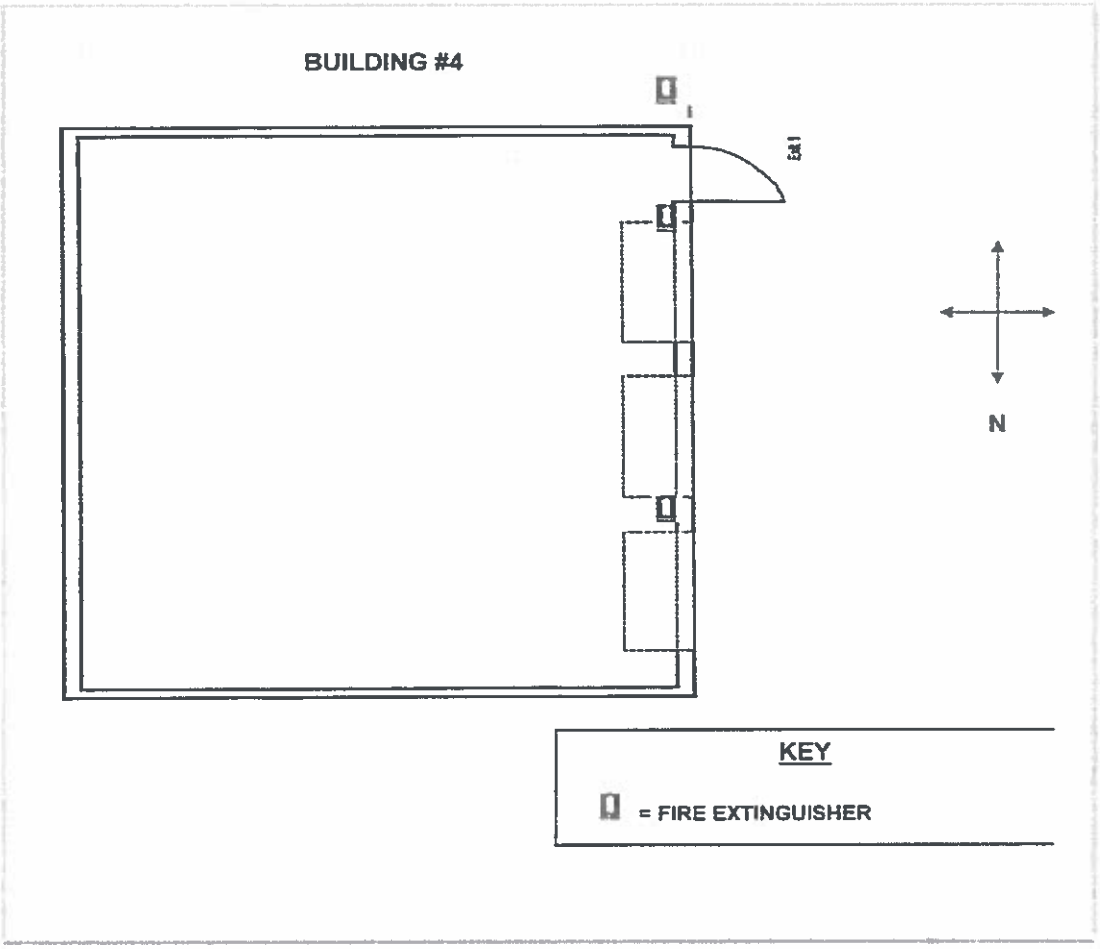


**Fig. 10** Building 4 – Equipment and File Storage.

### 2.2.1.10 BUILDING 5

Building 5 is located immediately north of Building 4 (see Figure 11). Building 5 is a 125' x 46' steel structure that is divided into four working areas and has a 100' x 20'concrete access ramp along the west side. The 75' long enclosed structure is divided into the Southern Bay, Central Bay, and Northern Bay. The Southern Bay and Central Bays appear to be a single room, however the Bays are separated by tall racks storing clean/unused drums. The remaining 50' of the structure is a covered dock (Dock 3), that is open-walled on three sides.

**Southern Bay**

The Southern Bay is a 25' x 46'. It has a concrete floor (Figure 11). It is used only for EMI operations supply storage (e.g. containers, absorbents, and chemical products EMI staff use to perform daily operations).

## Central Bay

The Central Bay is a 25' x 46'. It has a concrete floor (Figure 11). The Central Bay is the Nonhazardous Universal Waste Storage and Processing area used for the segregation, consolidation, and processing of Universal Wastes and the storage of nonhazardous Universal Waste.

## Northern Bay

The Northern Bay is a 25' x 46'. It has a concrete floor (Figure 11). It is used utilized as a receiving and temporary staging area for the Product Distribution Program, which is beyond the scope of this permit and as such, shall not be discussed herein. However, the Product Distribution Program internal guidance document is provided as Attachment 25 upon request by and as a courtesy to ODEQ.

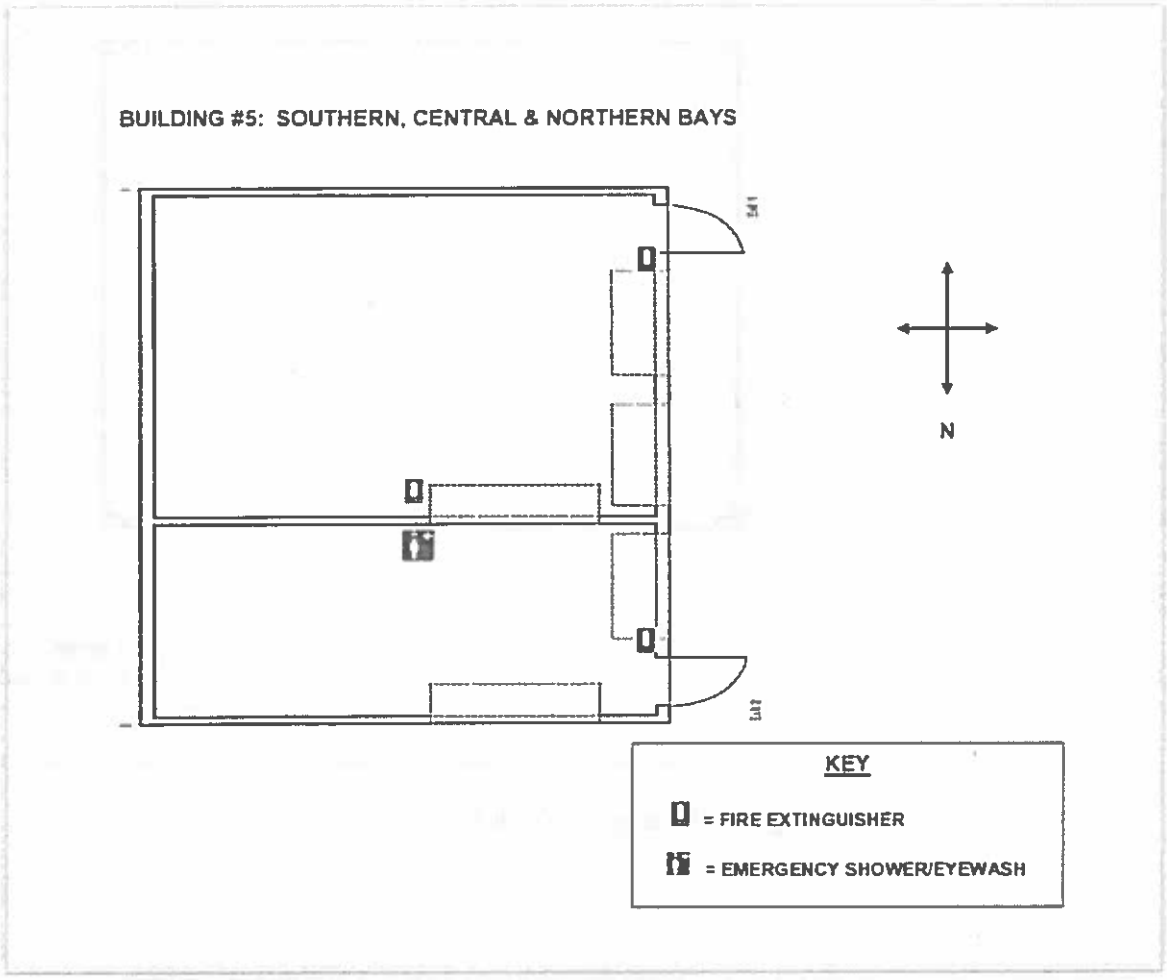


**Fig. 11** Building 5 – Southern, Central, & Northern Bays.

## Dock 3

At the northern end of Building 5 is a concrete dock 50' x 46', known as Dock 3, and used to store materials in the Product Distribution Program. This dock has a steel roof and was engineered with 4" of concrete curbing along all sides. The floor of Dock 3 is

sloped to allow drainage into a sump. The sump, having an area of 4' length x 2' width x 2' depth, provides a volume of 120 gallons of secondary containment. Should precipitation collect in the sump, and remain after 72 hours, it is vacuumed out, containerized, and analyzed to ensure proper characterization and disposal.

Entry to the dock is facilitated by a 20' x 25' concrete access ramp on the west side. The other half of the west side of Dock 3 is dock height and used to stage transport trailers bringing in containers for the EMI Product Distribution program. The Product Distribution Program is beyond the scope of this Plan, and as such is not discussed herein. However, the Product Distribution Program internal guidance document is provided as Attachment 25 upon request by and as a courtesy to ODEQ.

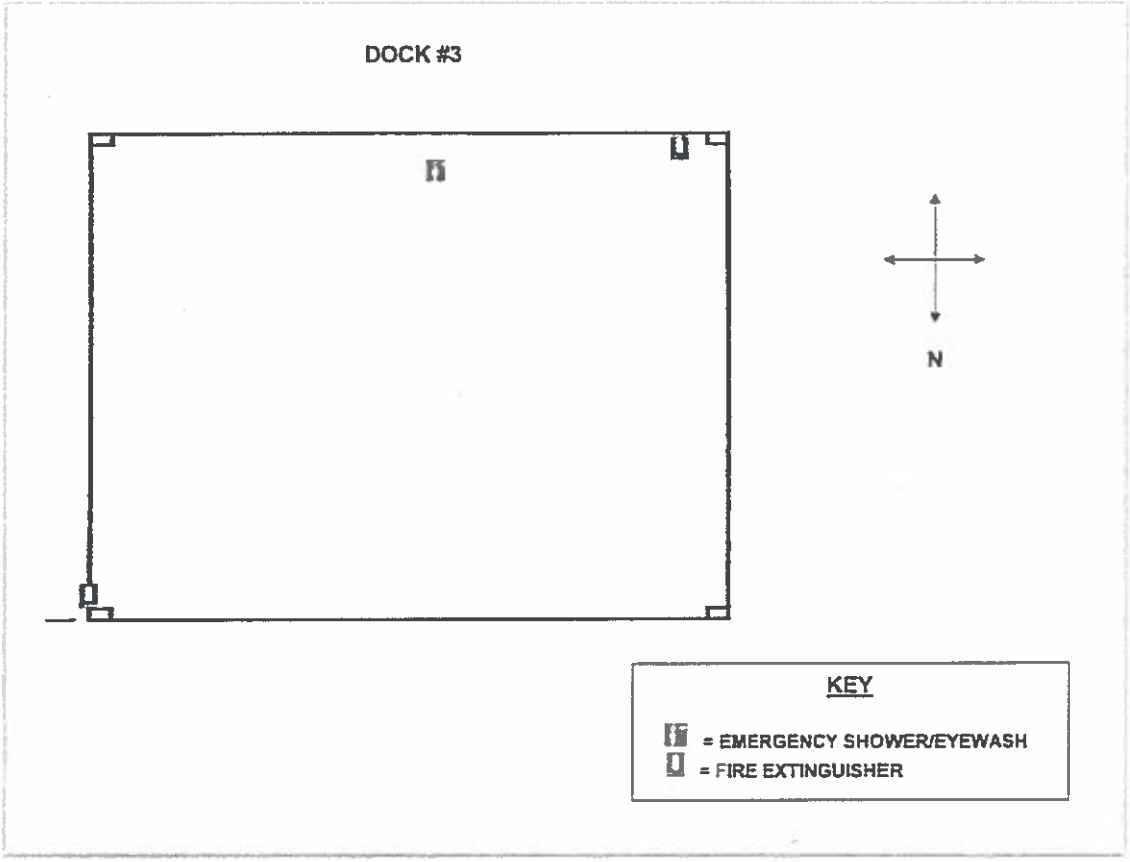


**Fig. 12** Building 5 – Dock 3.

### 2.2.1.11 FACILITY EQUIPMENT USED ONSITE

A complete line of emergency response supplies and hand-held equipment at the EMI Transfer Station Facility is stored in either Building 1 or Building 2. The heavy equipment, trailers, trucks and rolloffs are staged in the center of the property to the west of Building 4 and to the west and north of Dock 3.

A complete listing of facility equipment is provided as Attachment 9.

## 2.2.2 OAC 252:205-15-2(b)(2) Transfer Station Handling Activities

A description of all proposed Transfer Station handling activities for any hazardous waste, solid waste or other wastes claimed to be unregulated or exempt.

EMI filed notification with both the Environmental Protection Agency (EPA) and the ODEQ that it is involved in temporary staging of waste as a function of conducting hazardous waste transportation activities. EMI has been assigned Transporter Number UPM-0343005-OK by the Alliance for Uniform HazMat Transportation Procedures through the Oklahoma Corporation Commission, which authorizes such transportation activities. Waste Handling Process Flow Charts are provided in Attachment 11.

**Table 1.** EMI Transfer Station Handling Activities – Wastes & Materials Regulatory Criteria

| ACTIVITY | LIMIT | REGULATION |
|---|---|---|
| VSQG Hazardous Waste – Consolidate [a] & Process | ≤ 90 day | OAC 252:205<br>40 CFR 264.1(g) |
| SQG & LQG (Off-Site) Hazardous Waste – Transport | ≤ 10 day | OAC 252:205<br>40 CFR 263 |
| LQG Hazardous Waste (On-Site) – Generate, Consolidate [a], Process & Transport | ≤ 90 day | OAC 252:205<br>40 CFR 262.17 |
| Nonhazardous Solid Waste – Consolidate, Process & Transport | ≤ 365 day | OAC 252:205 |
| Nonhazardous Industrial Waste (NHIW) – Consolidate, Process & Transport | ≤ 365 day | OAC 252:205<br>OAC 252:515 |
| Recyclables – Generate, Consolidate & Transport | ≤ 365 day | OAC 252:205 |
| Used Oil – Generate, Consolidate, Process & Transport | ≤ 35 day | OAC 252:205<br>40 CFR 279 Subpart C<br>40 CFR 279 Subpart E |
| Universal Waste – Consolidate & Transport | ≤ 365 day | OAC 252:205<br>40 CFR 273 & 273.35 |
| Hazardous Waste Transporter | ---- | 40 CFR 263 |
| Asbestos Contaminated Building Materials Transporter | ≤365 day | OAC 380:50 |

Note: [a] See "Bulking or Containerizing Compatible Hazardous Wastes for Transportation," EPA Memo, 3/1/1990 (Attachment 10).

### 2.2.2.1 VSQG HAZARDOUS WASTE

EMI is involved processing, storing and transporting hazardous wastes (EPA Waste Codes D, F, K, P & U) generated by various Very Small Quantity Generators (VSQGs). EMI has declared itself to be a large quantity generator, due to the volume of VSQG waste accepted and processed.

There are two areas where VSQG hazardous waste is stored at EMI. One location is the Hazardous Waste Dock (Dock 2), which is on the west end of Building 3. As EMI routinely receives containers that are too light or small to be securely stored on an open dock, a second designated storage area for VSQG waste is the Mix Room, also located in Building 3.

The Mix Room is used for processing VSQG waste, which mainly amounts to consolidating and/or re-containerizing for more efficient shipment. Other processes associated with VSQG waste handling include neutralization and solidification, which are also employed in the Mix Room. Once the VSQG waste is processed it is reclassified in the EMI waste tracking system as an EMI LQG waste and stored on Dock 2.

EMI ships all consolidated VSQG waste off-site, using a manifest containing LDR information, within the LQG time constraint of 90 days.

### 2.2.2.2 SQG & LQG HAZARDOUS WASTES

EMI acts as a transfer facility for hazardous wastes (EPA Waste Codes D, F, K, P & U) generated by Small Quantity Generators (SQGs) and Large Quantity Generators (LQGs). When moving SQG and LQG wastes through its Facility, EMI is acting only in the capacity of a Transfer Facility.

Adjacent to the western end of Dock 2 sets a waste transport van trailer. SQG and LQG manifested hazardous waste arrives at the EMI Transfer Station Facility (e.g. waste for which EMI is acting only as the waste transporter). Once the waste containers are checked, verified, and sorted, they are loaded onto the van trailer planned to be utilized for in-transit delivery. All DOT regulations, including those for appropriate waste transport, segregation and the use of DOT 'shippable' containers are complied with per 40 CFR 172-179, while arrangements are made to ensure safe transport of all wastes to an appropriately permitted disposal facility.

When hazardous waste shipments from SQG and LQG facilities are routed through the EMI Transfer Station Facility, the waste is stored on the EMI site for a period of less than 10 days (per 40 CFR 263.12), while arrangements are being made to ship them to the appropriate TSD facility.

### 2.2.2.3 EMI-GENERATED LQG HAZARDOUS WASTE

The only hazardous waste streams that EMI generates through processes from its own operations includes incidental 1) residues and wastewaters generated from washing/rinsing of VSQG containers, and 2) residues and wastewaters generated from cleaning out bulk tanker trucks. The majority of EMI LQG Hazardous Waste is associated with 1) the VSQG waste it accepts and processes, and 2) Commercial Products that could not be distributed through the EMI Product Distribution program within the 45 day timeframe. All EMI LQG waste is stored on Dock 2.

As an LQG, EMI complies with the provisions of 40 CFR 262.17. This includes making waste determinations, proper use of the manifest, proper packaging and labeling of all waste being shipped off-site (Hazardous Waste and DOT labeling), proper adherence to satellite accumulation requirements, storage limit restrictions (<90 days), and recordkeeping requirements, such as quarterly and biennial reports, etc.

### 2.2.2.4 NONHAZARDOUS SOLID WASTE

The Nonhazardous Solid Wastestream is principally derived from the processing of VSQG wastes, nonhazardous solids (such as used absorbents, food additives, plastic pellets, etc.) and liquids (such as water-based adhesives, food additives, and coolants) from other generators. Nonhazardous solids and liquids in containers are stored in the Nonhazardous Waste Staging Area. These wastes are staged in this area awaiting consolidation into the rolloff box or long enough to obtain approval for proper disposal at an NHIW Landfill.

This material is consolidated, as necessary. These activities are conducted on Dock 1 or within the Mix Room (Bldg 3). These wastes are then put into a rolloff box, staged adjacent to Dock 1.

### 2.2.2.5 NONHAZARDOUS INDUSTRIAL WASTE

Given the ODEQ list of NHIW Waste Streams cited in OAC 252:515, Appendix F, EMI's NHIW has historically included non-flammable Paint waste; Absorbent materials contaminated with residual used oil; Petroleum-contaminated soil and debris from off-site emergency spill response clean-up events; Lab-related wastes; Containers which are RCRA empty (in accordance with 40 CFR 261.7); Combustible materials not regulated as hazardous wastes (per 49 CFR 173.120 & .124); as well as Resins, polymers, & adhesives.

These items are stored in the Nonhazardous Waste Storage Area. These wastes are staged in this area awaiting consolidation into the rolloff box or long enough to obtain approval for proper disposal at an NHIW Landfill. This material is consolidated. These activities are conducted on Dock 1 or within the Mix Room (Bldg #3). These wastes are then put into a rolloff box and staged adjacent to Dock 1.

### 2.2.2.6 RECYCLABLE MATERIALS

Recyclable materials include scrap metal and plastic materials from metal and poly drums and/or plastic containers. The drums are triple rinsed per EPA requirements on Dock 1. The rinse water is sent to Tank #3 and the containers are staged north of Building 5. The volumes of materials are tracked to ensure a minimum of 75% of the material is sent to a registered recycling facility on an annual basis.

### 2.2.2.7 USED OIL

EMI is a used oil generator, processor, and transporter. EMI generates used oil from maintenance activities associated with its fleet of vehicles. Used oil is also collected from customers and brought to EMI for consolidation, where it is held on-site for no more than 35 days per 40 CFR 279.45(a). EMI-generated used oil and customer used oil are combined and shipped off site via a registered used oil transporter.

Under 40 CFR 279(a) "used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation." This rule goes on to say transporters are not allowed to "process" used oil without complying with the Processor/Re-refiner rules unless the processing activities are limited to those described in 40 CFR 279.41(b). That rule explains. "Transporters may conduct incidental processing operations that occur in the normal course of used oil transportation (e.g., settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products..."

EMI relies upon gravity settling and water separation processes in its management of used oil. Although a coarse inline filter is used during transfers, this is done to protect equipment rather than process the used oil. The activities conducted at EMI are not intended to produce used oil products or to make the used oil more amenable for the production of used oil products. EMI considers itself a Transfer Facility only, and makes no claim of any improvements to the quality of used oil shipped from our facility.

Used oil, principally contained in fifty-five gallon drums, arrives at EMI, is off-loaded at Dock #1 and pumped into Tanks #4 or #7, allowing for simple separation of any oil and water. The oil layer is transferred to used oil Tanks #12 & #13, where it is stored until collected periodically by a registered used oil transporter. The water layer is pumped to an above ground tank, Tank #3, where it is stored until off-site shipment is made to a local NHIW landfill for solidification.

EMI, in compliance with 40 CFR 279.45(h), is prepared to implement the following four-step process in the event of a release.

- Stop the release,
- Contain the released used oil,
- Clean up and manage properly the released used oil and other materials, and
- If necessary, repair or replace any leaking used oil storage container or tanks prior to returning them to service.

As a transporter of used oil, EMI must determine whether the total halogen content of used oil being accepted for transport and storage is above or below 1000 ppm. The EMI Used Oil Analysis Plan addresses this issue via the implementation of Waste Generator Certification practice coupled with a decision tree analysis regarding when lab analysis must be implemented. This document is included in this Plan as Attachment 12.

Used oil transporters must keep a record of each used oil shipment accepted for transport and delivered to another used oil transporter. To maintain compliance with the provision of this rule, EMI has developed a recordkeeping system that addresses all of the requirements specified in 40 CFR 279.46(a) and (b).

EMI does not export used oil, nor does it send any of its used oil liquids to a disposal facility. All used oil is delivered to a registered used oil transporter. Solids, such as floor dry or absorbent that is contaminated with residual used oil, are disposed of at an Oklahoma landfill, approved to accept NHIW. The petroleum materials are consolidated into a rolloff boxes designated specifically for TPH materials, and then delivered to a NHIW landfill when they are full.

The west end of Dock 1 supports a T-shaped containment sump. The cross bar portion of the sump has dimensions of 2' width x 20' length x 1' depth (40 $ft^3$), while the "I" bar section of the sump has dimensions of 2' width x 20' length x 2' depth (80 $ft^3$). This sump provides approximately 900 gallons of secondary containment (120 $ft^3$ x 7.48 gal). The sump, as well as the dock surface, are inspected daily and kept clean to avoid contamination of precipitation that may collect in the sump. Should precipitation collect in the sump, and remain after 72 hours, it is vacuumed out, containerized, and analyzed ensuring proper characterization and disposal. No process water is allowed outside of secondary containment and no process water is discharged or disposed on site.

#### 2.2.2.8 UNIVERSAL WASTE

Universal Waste received by EMI consists of fluorescent bulbs, batteries, mercury-containing equipment and miscellaneous electronics scrap. These materials are sorted, segregated and/or consolidated into drums or boxes. Once these materials are prepared for shipment they are either stored on Dock 2, or within the Nonhazardous Universal Waste Storage area in Building 5.

Where it has not been supplied by the Generator, broken bulbs incidental to transportation are sampled and a sample sent to a lab for mercury analysis to ensure proper disposal at either a Universal Waste Recycling facility or a NHIW Landfill (see the process flowsheet in Attachment 11).

#### 2.2.2.9 ASBESTOS WASTE

Asbestos waste is stored in lined rolloff boxes that are covered with water-tight tarps in the rolloff staging area until approval for disposal is obtained. These materials are sent to a Nonhazardous Industrial Landfill.

### 2.2.3 OAC 252:205-15-2(b)(2)(A) Estimations of Waste Holding Capacities

Between all of the Facilities in operation at the EMI Facility for the waste types listed in Table 1 (presented above), the EMI waste capacity is calculated to be:

| | | |
|---|---|---|
| VSQG & LQG HW (Dock 2) & Mix Room | 125 drums (55-gal drum) | 6,875 gal |
| SQG & LQG HW (in-Transit Trailer) | 88 drums (55-gal drum) | 4,840 gal |
| Nonhaz Solids (NH Staging Area) | 420 drums (55-gal drum) | 73.5 Tons |
| Nonhaz Bulk Solids (Rolloffs & Tank 1) | ----- | 240 Tons |
| Recyclable Metals & Plastics | 4 Rolloffs | 35 Tons |
| Used Oil & NH Wash Water (Tanks 3, 4, 7, 12 & 13) | | 16,000 gal |
| Universal Wastes – Lightbulbs (Bldg 5) | 7000 bulbs | 5 $yds^3$ |

## 2.2.4 OAC 252:205-15-2(b)(2)(B) Description of Wastes, Tanks, Containers

### 2.2.4.1 WASTES

A comprehensive discussion regarding the types of wastes EMI accepts for consolidation and transport and the associated waste handling activities is presented previously in the section above entitled, *"2.2.2 OAC 252:205-15-2(b)(2) Transfer Station Handling Activities"* and the section below entitled *"2.2.5 OAC 252:205-15-2(b)(2)(D) Waste Transfer and Bulking Procedures"*.

### 2.2.4.2 TANKS

EMI has the following above ground storage tanks located on site. It should be noted that EMI does not have any underground storage tanks, and there are no hazardous wastes stored in tanks at the EMI Transfer Station Facility.

**Table 2. EMI Tank Descriptions**

| Tank ID# | Type | Capacity | Tank Usage |
|---|---|---|---|
| 1 | Steel | 40 $yds^3$ | Fly Ash (product) |
| 3 | Stainless Steel | 9000 gal | Nonhazardous Wastewater Storage |
| 4 | Open Top Steel | 1500 gal | Oil/Water Separator |
| 7 | Open Top Steel | 2500 gal | Oil/Water Separator |
| 12 | Steel | 2000 gal | Used Oil |
| 13 | Steel | 2000 gal | Used Oil |
| 16 | Steel | 300 gal | Off-Road Diesel |

Tank 1 is used to store Fly Ash product used in waste solidification activities. Tanks 4, 7, 12 and 13, are utilized for used oil management. Tanks 4, 7, 12 and 13, located above ground on Dock 1, were in existence prior to the effective date of the Federal Part 279 Used Oil Standards being adopted in Oklahoma. These tanks are all in good condition, properly labeled with the words "Used Oil", and have secondary containment. Tank #3 is used to store Nonhazardous Wastewater. The Nonhazardous waste water is comprised of decanted water resulting from the used oil/water separation process and rinsate from equipment decontamination and container rinsing activities.

### 2.2.4.3 CONTAINERS

Waste on the EMI Transfer Station Facility are stored in above-ground storage tanks, rolloffs, totes, and metal and poly drums that are traditionally known as 110-, 95-, 85-, 55-, 30-, 15- and 5-gallon.

## 2.2.5 OAC 252:205-15-2(b)(2)(C) Hours of Operation

The normal hours of operation for the EMI Transfer Station Facility are from 0800 hours through 1700 hours, Monday through Friday. As EMI provides Emergency Spill Response services, the facility may be open during hours other than those stated above, for the sole purpose of providing EMI employee access to equipment and supplies necessary to respond to emergency events.

## 2.2.6 OAC 252:205-15-2(b)(2)(D) WASTE TRANSFER AND BULKING PROCEDURES

Waste Transfer and Bulking Procedures Including Associated Compatibility Analysis:

Both hazardous and non-hazardous wastes in solid, liquid, and semi-solid forms are managed at the Transfer Station. EMI handles VSQG Materials, RCRA-regulated Hazardous Wastes, Nonhazardous Solid Wastes, Nonhazardous Industrial Wastes (NHIW; including Asbestos-containing Materials), Recyclable Materials, Used Oil, Universal Waste, and Trash and Debris (see Table 1 above).

Prior to bulking compatibility of wastes and materials is determined by process knowledge given by the waste generators and/or that which is presented on the Safety Data Sheets. In many cases the compatibility is verified by small sample testing.

### 2.2.6.1 WASTES & MATERIALS MANAGEMENT AT EMI

EMI is aware of how important it is to properly characterize and manage both solid and hazardous wastes. EMI long ago recognized the need to develop a comprehensive waste tracking and management system and has invested a great deal of resources to develop an approach that in many respects rivals the largest full-service TSD operations in the nation. To help insure the EMI staffs' successful management of waste at the EMI facility, an electronic Waste and Materials Information Management System has been developed. This system enables the company to retain complete control over the waste and its place in the waste disposal process, as discussed below.

EMI is both a waste management company and a transportation company, and in most cases is the primary transporter of waste both from the customer's site to EMI, and from EMI to the final waste disposal site. The Project Coordinators make the initial contact with the customer, working closely with them to ensure the waste is properly characterized. The waste characterization is based on process knowledge, available Safety Data Sheets (SDS), or on analysis of the waste. In EMI's experience, customers usually have sufficient knowledge to properly characterize their waste. However, when that is not the case, EMI assists them by offering access to third-party laboratories as part of its service. Waste packaging and labeling is also provided by EMI upon customer request. As a registered hazardous waste and hazardous materials transporter, EMI has the knowledge and experience to assist customers in compliance with the Department of Transportation regulations. The bottom line is that EMI is usually involved with the proper waste profiling, packaging, labeling, and management of a customer's waste prior to it arriving at the EMI Transfer Station Facility. The process by which EMI will handle the materials is determined prior to arrival. No waste is ever accepted at the EMI Facility without prior approval.

Once the EMI Project Coordinator has obtained the required waste characterization information, he initiates the creation of the appropriate shipping documents through the Waste and Materials Information Management System, which maintains detailed records of each client, i.e. names, addresses, EPA identification numbers, disposal plan numbers, wastestream information, etc. The Project Coordinator supplies the determined DOT shipping information, disposal destination, disposal approval numbers, etc. Upon receipt of the submitted information, the Shipping and Receiving Records Management Department (SRRM) staff will review it for regulatory accuracy

and print the required shipping documents and labels. The documentation is then given to the Operations Manager awaiting scheduling.

The waste pickup is then scheduled by the Operations Manager who ensures the team has all the required shipping documentation. All EMI drivers hold commercial driver's licenses (CDL) with hazardous materials endorsements, which is only granted after successful passage of a skills and knowledge test on all aspects of DOT requirements for transporting hazardous materials. When they arrive at the customer's site, the drivers will verify that all wastes are properly packaged (the waste containers are sealed and appropriately labeled w/ dates), and will complete the amount of waste (i.e. container size and the number of containers) on the shipping documents. The driver ensures all appropriate signatures are in place and provides the client with a copy of the shipping document.

When EMI ships materials that are considered "hazardous materials" by DOT, but do not meet EPA's definition of "hazardous waste", an EMI Shipping Ticket is used (see Attachment 13). The EMI Shipping Ticket has been modeled after the EPA Uniform Hazardous Waste Manifest. If the materials are hazardous waste as defined by RCRA, the Uniform Hazardous Waste Manifest is used.

When the wastes arrive at the facility, the EMI driver unloads them in the proper storage area. Hazardous materials are directed to the appropriate hazardous storage area and Nonhazardous materials are directed to their approved storage areas.

For non-EMI transported containers, drivers are required to stop at the Shipping & Receiving office and present their delivery documentation to the SRRM Supervisor. It is compared to the prepared Shipping Tickets (see above) to ensure the information corresponds. The containers are unloaded in an approved storage area and inspected.

Once all containers have been off-loaded and safely moved to the appropriate storage locations, the shipping papers are forwarded to the EMI Shipping and Receiving Records Management Department.

The SRRM Department receiving clerk reviews the documentation, yet again, for accuracy. Uniform Hazardous Waste Manifests utilized for SQG/LQG 10-day transport of waste are stored in a specified office area while awaiting shipment to the final designated facility. If the materials arrive on a Shipping Ticket, the receiving clerk signs it as a representative of EMI being the designated facility. All information from the shipping documents is entered into the Waste and Materials Information Management System.

For waste or materials that are intended for processing, a Work Order (which includes an SDS as applicable) is created to instruct the technicians of the appropriate actions to be taken for each container. Technicians will consolidate or process the waste, based upon the specifications stated on the Work Order they are assigned. The Technicians keep detailed notes on the Work Order that clearly indicate into which consolidation container the materials were placed, the date it was consolidated, and the initials of the technician performing the work. The completed Work Order is returned to the SRRM clerk who enters all the above information into the information management system, creating an electronic record of the materials going through the processing phase of the facility. Each consolidation drum, rolloff box, and tank has a unique number, which allows for the identification of the type of wastes or materials that were placed in each container and their origins. The consolidated wastes or materials are then sent off-site

for proper disposal. As a result of this system, EMI is able to sustain the cradle-to-grave intention of the initial RCRA program, even for non-RCRA wastes.

EMI relies on this comprehensive system to prevent the inadvertent co-mingling of hazardous and nonhazardous wastes and materials. The EMI Waste and Materials Information Management System provides a high level of surety regarding the waste management process employed at the EMI Transfer Station Facility.

An important point of clarification is that, with the exception of elementary neutralization, EMI does not treat or process waste for the purpose of changing its legal classification. Nonhazardous waste is consolidated and stabilized, if necessary, with fly ash (or equivalent material) to prevent liquids from being disposal at a landfill. VSQG hazardous waste is consolidated for cost considerations. All waste materials are shipped off-site to a properly permitted disposal facility. Although it is now a regulatory requirement, EMI has always taken the attitude that the consolidated waste is an EMI-generated waste and has accepted full responsibility for managing that waste under the requirements of a large quantity generator.

### 2.2.6.2 COMPATIBILITY ANALYSIS

In order to prevent the mixing of incompatible wastes, they are not placed in the same container. Incompatible wastes will be identified upon receipt at the transfer station by the use of shipping documents, acceptance documents, etc. The transfer containers (e.g.; drums, roll-off boxes, etc.) are inspected prior to use to ensure the container is free of residues of previous, potentially incompatible waste. Prior to compatibility testing, the records will be reviewed to evaluate potential incompatibility. If there is no indication of significant incompatibility in those records, representative samples of the wastes to be bulked together will be mixed and observed to ensure their compatibility. If the wastes demonstrate potential incompatibility, they will not be bulked together. Some examples of waste incompatibility are the generation of significant amounts of heat, large amounts of precipitate, unacceptable increases in viscosity, and undesirable layering.

"No Smoking" signs will be place conspicuously wherever there is a potential hazard from ignitable or reactive wastes.

Precautions are taken during the transferring/processing of wastes to prevent reactions which generate extreme heat, or pressure, fire or explosions, or violent reactions; which produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; which produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion; which damage the structural integrity of the transfer station; or which through other like means threaten human health or the environment.

During the handling of ignitable, reactive, or incompatible wastes, EMI personnel utilize the following procedures:

1. No smoking, open flames, or other sources of ignition are allowed in the transfer station except in designated areas.
2. Facility personnel ground the trucks and containers to avoid the accumulation of static charge.

3. Facility personnel utilize appropriate protective gear to protect themselves when handling ignitable, reactive, or incompatible wastes.
4. Facility personnel do not place incompatible or reactive wastes in containers contaminated with other incompatible or reactive wastes.
5. When handling ignitables in buildings, the vapors are continually swept by ventilation systems (including open-air buildings). No smoking, open flames, or other sources of ignition are allowed in the transfer station except in designated areas.

### 2.2.6.3 VSQG MATERIALS

VSQG materials (hazardous and nonhazardous) from multi-state very small quantity generators is handled by one of the following methods prior to off-site processing or disposal at an approved site.

1. Repackaging – this refers to the removal of small (less than one ounce to five gallon) containers from the original container and placing them (along with similar wastes from other jobs) into a larger outer container.
2. Consolidation – This refers to the process of opening small containers (i.e. may be less than one ounce and up to 55 gallons) and combining the materials into a 55-gallon drum, rolloff boxes, or tank. NHIW solids are consolidated on Dock 1 or in the Mix Room (Building 3). In this process, drummed material is either transferred to a rolloff box or another drum to reduce transportation-related costs.
3. Solidification – This consists of simply adding fly ash (or equivalent) to the waste for the purpose of absorbing any free liquid. This activity is done in containers of various sizes up to and including rolloff boxes. Fly ash is drawn from Tank 1 in small amounts such as five-gallon buckets or larger amounts such as a bobcat bucket as the project demands. The material is added to the waste in containers or rolloff boxes and mixed with an appropriate tool, depending on the container size (i.e. shovel in a 55-gallon drum, and trackhoe in a rolloff box).
4. Neutralization – Adding controlled amounts of acid or base to bring the wastes to a neutral pH. This is done in a container (poly) in the Mix Room and/or on the pad adjacent to the Mix Room.

Processing of hazardous VSQG waste is done in Building 3. Hazardous VSQG wastes are predominantly received by EMI as labpacks, which are small containers of material packaged into a larger container with adequate absorbent material suitable for shipment under DOT regulations. Under this scenario, a five-gallon pail may actually contain only one gallon or less of waste in several small containers packed in an absorbent material. These small containers are routinely removed from the five-gallon pail and consolidated with similar chemicals in a larger container (up to 55-gallon). As much of the material is still in its original container (e.g. Drano, Weed-B-Gone, etc.), its identification is straightforward. When this is not the case, EMI technicians use their knowledge and experience to properly classify the material along with simple field procedures, such as the use of pH paper or the basic test for flammability.

Once the material is classified by its basic characteristic, the materials are separated and consolidated with like materials. These consolidated drums are managed under the satellite accumulation standards while stored in the Mix Room in Building 3. For

example, a 55-gallon drum is designated as a satellite accumulation flammable liquid drum and all flammable liquid contained in the VSQG labpack drums is poured into the 55-gallon drum. Once the drum is full, it is dated and moved within three days to the approved storage area.

The Information Management System allows EMI to keep a complete inventory of what was consolidated in this flammable liquid drum. This same process is repeated for other categories of waste (e.g. paint related materials, flammable solid, etc.). The uncontaminated absorbent from the labpack is put in the NHIW rolloff box that is adjacent to Dock 1, pending shipment to an NHIW landfill. The outer containers are triple-rinsed and stored for re-use or recycled.

Once a drum in the satellite accumulation area is full, it is dated and moved to Dock 2, which is EMI's <90 day storage area for hazardous waste, awaiting transport to the appropriate final disposal facility.

### 2.2.6.4 RCRA-REGULATED HAZARDOUS WASTES

Transfer activities associated with SQG/LQG RCRA-Regulated waste would occur only if a container was found to be leaking in transit. The container would either be overpacked or the materials transferred into a new container. Since SQL/LQG 10-day transport waste is on a transport unit adjacent to Dock 2, this activity would occur on Dock 2 to minimize the impact of any leakage.

### 2.2.6.5 NONHAZARDOUS SOLIDS

Nonhazardous solids from multi-state generators are processed using one of the following methods, prior to off-site disposal at an approved landfill.

1. Repackage – See Definition in 2.2.6.3.
2. Consolidation – See definition in 2.2.6.3.

### 2.2.6.6 NONHAZARDOUS LIQUIDS

Nonhazardous liquids from multi-state generators are processed using one of the following methods, prior to off-site disposal at an approved landfill.

1. Repackage – See definition in 2.2.6.3.
2. Consolidation – See definition in 2.2.6.3.
3. Solidification – See definition in 2.2.6.3.

### 2.2.6.7 NHIW – SOLIDS

Special waste (NHIW) solids from multi-state generators is processed using one of the following methods, prior to off-site disposal at an approved landfill.

1. Consolidation – See definition in 2.2.6.3.
2. Biodegradation of hydrocarbon contaminated soils – this involves the addition of biodegradation enhancers (such as Biosolve or other degradation enhancer), to the waste and mixing it with a trackhoe to speed up the biodegradation process.

Testing is done to verify the success of the treatment and with the proper approval, the waste is taken to an NHIW landfill.

For NHIW solids greater than 10 cubic yards from clients, rolloff boxes are used for storage. When EMI responds to emergency response situations and is required to contain materials from spills, EMI will use rolloff boxes at the spill site. Excavated spill material is contained in the rolloff boxes and brought back to EMI. If necessary, fly ash is added to solidify the material in the rolloff box to ensure no free liquids are contained in the mixture. They are staged in a graveled area to the west of Building 4 and 5. The rolloff boxes are tarped to prevent infiltration of rainwater and staged only long enough to receive the lab analysis required to submit the appropriate form to the ODEQ and to secure approval for proper disposal.

### 2.2.6.8 NHIW – LIQUIDS

Special waste (NHIW) liquids from multi-state generators is treated by one of the following methods prior to off-site disposal at an approved site.

1. Repackage – See definition in 2.2.6.3.
2. Consolidation - See definition in 2.2.6.3.
3. Solidification – See definition in 2.2.6.3.
4. Solids removal – refers to the simplest technology of gravity separation after which the liquid phase is drawn off into Tank 3 and the solids are put into an NHIW rolloff.
5. Filtering – some material has phases and impurities that are not completely resolved by gravity separation. Therefore, in some instances, the material is poured and/or pumped through a simple filter. The liquid is consolidated into Tank 3 and the filter is put into the NHIW rolloff.

### 2.2.6.9 RECYCLABLES

Empty metal and poly drums that are in DOT-shippable condition are triple-rinsed and stored for re-use. Unusable containers, poly liners and other recyclable containers are triple-rinsed and sent to a scrap metal or plastic recycler.

### 2.2.6.10 USED OIL

Used oil from in-state and out-of-state generators (as allowable according to state-specific regulations) shall be consolidated for purposes of transportation per 40 CFR 279(a). The used oil is transferred from the shipping containers to the oil/water separator Tanks 4 or 7 located on Dock 1. The separated oil is transferred to one of two Used Oil storage tanks (Tank 12 & 13) on Dock 1 awaiting transfer to a used oil recycling facility. The decanted water is transferred to Tank 3 adjacent to Dock 1. Used oil is shipped off-site by a registered used oil transporter within 35 days.

### 2.2.6.11 UNIVERSAL WASTE

Universal Waste received by EMI consists of fluorescent bulbs, batteries, mercury-containing equipment and miscellaneous electronics scrap.

**Fluorescent Bulbs** – Many different types of fluorescent and specialty bulbs are received at EMI. In the Nonhazardous Universal Waste Storage and Processing area in Building 5, they are sorted, segregated, consolidated, and stored by type and size in drums or boxes. Where it has not been supplied by the Generator, broken bulbs incidental to transportation are sampled and the sample sent to a lab for mercury analysis to ensure proper disposal at either a Universal Waste Recycling facility or an NHIW Landfill (see the process flowsheet in Attachment 11).

**Batteries** – Many different types of batteries are received at EMI. In the Nonhazardous Universal Waste Storage and Processing area in Building 5, undamaged batteries are sorted, segregated and consolidated in drums. Once these materials are prepared for shipment they are stored on Dock 2. Damaged batteries are simply prepared for shipment by ensuring their containers are non-leaking and stored on Dock 2.

**Mercury-Containing Equipment** – If the construction of the equipment allows, the elemental mercury is removed in the Mix Room and stored in a mercury flask awaiting shipment to a precious metals recycler. The mercury receptacle of the equipment is placed in a Mercury Contaminated Debris consolidation drum awaiting shipment to an approved disposal facility. Electronic components are placed in a miscellaneous E-waste consolidation container which is stored on Dock 2. If the construction of the equipment does not allow for the removal of the elemental mercury, the equipment is prepared for shipment as-is and stored on Dock 2.

**Miscellaneous Electronic Scrap (E-Waste)** – Electronic scrap (e.g. computers, monitors, charging cords, etc.) are consolidated into a drum or box or onto a pallet and stored on Dock 2.

#### 2.2.6.12 TRASH AND DEBRIS

An incidental amount of municipal trash and debris is generated from EMI facility operations. All municipal trash and debris is combined and compacted for transport and disposed at a municipal landfill or an NHIW landfill if doing so would be more cost-effective.

## 2.2.7 OAC 252:205-15-2(b)(2)(E) No Co-Mingling of Waste Types

Provisions to Assure That Solid Wastes Destined for Disposal in Non-Hazardous Waste Facilities Are Not Co-Mingled with Hazardous Waste:

The EMI Waste and Materials Information Management System tracks waste movements by assigned container identification numbers. This, along with strict adherence to DOT regulations associated with waste container labeling and marking, enables the staff to ensure appropriate physical separation of waste containers by waste classification and by generator category. The tracking system was developed to prevent co-mingling between incompatible waste types and to ensure containers associated by waste classification (i.e., Hazardous vs Nonhazardous) and waste generator category (i.e., VSQG vs LQG) are readily identified. This knowledge enables staff to keep waste classifications and generator categories grouped accordingly, to ensure waste transfer holding requirements are met.

## 2.2.8 OAC 252:205-15-2(b)(2)(F) Hazardous Wastes - 10 Day Storage Restriction

Provisions to Assure That Hazardous Wastes Subject to the Ten (10) Day Storage Restriction of 40 CFR 263.12 Will Not Be Stored or Otherwise Managed with Hazardous Wastes That Are Not Subject to the 10-Day Restriction, Solid Wastes, or Other Wastes Claimed to be Unregulated or Exempt;

Adjacent to the western end of Dock 2 sets a waste transport van trailer. SQG and LQG manifested hazardous waste arrives at the EMI Transfer Station Facility (i.e. waste for which EMI is acting only as the waste transporter). Once the waste containers are checked, verified and sorted they are immediately loaded onto the van trailer planned to be utilized for continued transport. All DOT regulations, including those for appropriate waste transport, segregation and the use of DOT 'shippable' containers are complied with per 40 CFR 172-179, while arrangements are made to ensure safe transport of all wastes to an appropriately permitted disposal facility.

EMI's Waste and Materials Information Management System, enables the staff to not only ensure physical separation of waste containers by waste classification and by generator category, but also tracks timeframes for the various wastes stored on-site. This enables the staff to meet the intended shipment timeframe for off-site disposal.

## 2.2.9 OAC 252:205-15-2(b)(2)(G) Truck/Equipment Cleaning & Decontamination

Truck and Equipment Cleaning and Decontamination Procedures;

All trucks and equipment that have been in contact with hazardous materials are decontaminated with the use of high-pressure spray washers or steam cleaning. This process is accomplished on Dock 1. The wash water is then drummed, sampled and analyzed to determine the proper method of disposal.

Customer tanker trucks are also sent to EMI for clean out and decontamination. This activity is conducted on Dock 1. Waste removal may be accomplished by a variety of methods including but not limited to: pumping, shoveling, sweeping, rinsing, and steaming. Material removed from the tankers is drummed, including rinsate and after proper characterization is sent off site for proper disposal.

## 2.2.10 OAC 252:205-15-2(b)(2)(H) No Waste On Site for Longer Than One Year

Procedures to Ensure That No Waste Remains On Site for Longer Than One Year from the Date It Is Received;

EMI's Waste and Materials Information Management System, enables the staff to not only ensure physical separation of waste containers by waste classification and by generator category, but also tracks timeframes for the various wastes stored on-site. This enables the staff to meet the intended shipment for off-site disposal timeframe.

## 2.2.11 OAC 252:205-15-2(b)(3) Safety, Training & Security

A description of all safety, training and security provisions identified in 40 CFR 264.14 through 264.17;

### 2.2.11.1 SAFETY

#### 2.2.11.1.1 Personnel

At Environmental Management (EMI) we know the most important assets are our employees. We take a deep stake in safety, which goes from the President all the way to any entry level position. We have several degreed safety professionals on staff and EMI takes great pride in ensuring the safest work environment possible. EMI has developed many methodologies that strive not just for compliance with safety regulations, but exceed safety standards and raise the bar for safety expectations. The behavior-based safety program that has been developed protects our employees, without slowing production of work projects. Safety is a team effort at EMI, which every employee is responsible for.

**Emergency Response** – As an emergency response company, we know that every situation is different. We use our knowledge, experience and training to clearly identify hazards associated with known chemicals and situations, working toward the end goal of protecting the environment and our workers. At EMI Buildings and docks are equipped with automated alarms that upon detection of smoke at the EMI Transfer Station Facility, alert the Guthrie Fire Department of the need to respond to the EMI Facility.

**Short Service Employee (SSE) Program** – All employees, who have been with EMI for six months or less, are engaged in the company's Short Service Employee Program. This program allows us to assign different, well qualified, mentors to help guide new hires through different safety functions. Prior to their release from this program, new employees are not allowed to engage in any safety-sensitive function without direct supervision.

**Field Supervisors** – All field supervisors have, without a doubt, shown they have a strong commitment to all safety and health programs. All of our Field Supervisors are trained to perform as well as clearly explain how to do any job task safely.

**Personal Protective Equipment (PPE)** – When an emergency occurs, PPE is the last line of defense available to our employees. Knowing that, EMI provides PPE that meets or exceeds safety standards. Our Project Managers, having had years of experience with hazardous materials and emergency response, know how to select the proper PPE to protect our staff.

The *Health and Safety Plan* for the EMI Transfer Station Facility is provided as Attachment 24.

#### 2.2.11.1.2 Facility Safety and Inspection

The safe and productive operation of the EMI transfer station requires that all equipment and structures be maintained in proper working order. To accomplish this goal, a comprehensive schedule and checklist for the inspection, maintenance, and repair of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment has been developed (Attachment 14).

The Inspection Checklist indicates the areas to be inspected and what should be examined. The Inspection Schedule details the frequency of the inspections. The frequency of the inspection is based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Daily and/or weekly facility inspections will only be performed when the transfer station is operational (i.e., material and/or waste transfer staging activities are in progress).

#### 2.2.11.1.2.1 Emergency Equipment Inspection

The following discussion and summation is presented to outline the procedures EMI uses to ensure emergency equipment is in proper condition when, and if it is required by emergency conditions at the transfer station.

2.2.11.1.2.1.1 Communications and Alarm Systems

The public address system at the transfer station is tested daily via signal broadcast. Mobile phones are tested/operated daily. The internal/external telephone system is tested daily to ensure it is operational.

Facility alarm drills (fire, tornado, etc.) are conducted biannually.

All of the above listed equipment is on the facility inspection schedule and is maintained and repaired or replaced, as necessary.

2.2.11.1.2.1.2 Fire Protection Equipment

The fire extinguishers are inspected weekly for expiration dates and the pressure gauges are checked for adequate pressure.

All of the above listed equipment is on the transfer station inspection schedule and is maintained and repaired or replaced, as necessary.

2.2.11.1.2.1.3 Spill Control Equipment

Spill control equipment comes in many fashions. First, the collection system "sumps" in secondary containment systems will be inspected daily for evidence of liquids. Liquids, other than rainwater from recent or active storms, if present in other than "de minimis" levels, will be removed within 24 hours. Liquids from recent or active storms will be removed within 72 hours.

Secondly, containment systems will be inspected daily for evidence of spills or leaks. Should evidence of spills or leaks be discovered, within 24 hours they will be contained, and the containment debris containerized for appropriate disposal.

Thirdly, spill control materials (e.g., stabilization agents) are inspected daily for adequate supply.

All of the above listed equipment is on the transfer station inspection schedule and is maintained and repaired or replaced, as necessary.

2.2.11.1.2.1.4 Decontamination Equipment

Personnel decontamination equipment, such as eye wash stations and safety showers, are inspected weekly for operability.

All of the above listed equipment is on the transfer station inspection schedule and is maintained and repaired or replaced, as necessary.

2.2.11.1.2.1.5 Miscellaneous Emergency Equipment

Other than those items specifically annotated in the state and federal regulations, EMI has other equipment that may be put to use during an emergency. Although this equipment may not be set aside explicitly for on-site emergencies, they are, none-the-less, important when considering the facility's emergency response capabilities. For example:

- Site Company Vehicles and equipment can be utilized to carry victims or equipment from one place to another.
- Heavy Equipment may be utilized to dig a ditch or build a berm. Even though this equipment is not set aside for emergency use only, it is normally present. In as much as this is operational equipment, it is not included in the facility inspection schedule.
- Self-Contained Breathing Apparatus (SCBA) – is inspected weekly for adequate pressure; for proper operability and condition; to ensure regulators are unobstructed; and to check masks and hoses for serviceability.
- First Aid Kits –the first aid kits are maintained in several locations at the facility and are inspected for missing items and adequate supply.
- Entrance/Exit Gate –the gate prevents the unknowing entry, and minimizes the possibility for unauthorized entry of persons or livestock onto the Active portion of the facility. The gate is inspected daily to ensure their proper function. Warning signs per 40 CFR 264.14 are also posted around the active portion of the facility.

All of the above-listed equipment is maintained and repaired or replaced, as necessary.

**2.2.11.1.2.2 Container Inspection**

The container storage/staging areas will be checked daily for evidence of spills or leaks. The containers will be visually inspected upon receipt, and thereafter prior to off-site shipment, for evidence of leaks, corrosion, or deterioration. The contents of deteriorated containers will be transferred to a container in good condition or placed in an overpack (for drums).

**2.2.11.1.2.3 General Inspection Requirements**

It is the ultimate responsibility of the owner/operator to ensure that all inspections are performed as required. The inspections are part of the daily operations routine for the transfer station. They are assigned to an appropriate individual who is trained in the

proper appearance, usage and/or function of the inspected items, and state and federal requirements. In the event that individual is not at the facility when the scheduled inspection is due, a backup individual is assigned to perform the inspection.

Should a problem be noted during routine inspections, it is recorded on the Inspection Checklist and reported to the Operations Manager, Terminal Manager, and Safety Coordinator. Such problems are corrected on a schedule to ensure that a significant threat to human health or the environment does not exist.

The Inspection Checklists are kept in an inspection log. These records are maintained for at least three (3) years from the date of inspection. They include, at a minimum, the date and time of inspection, the name of the inspector, a notation of the observations made, and the nature and date of any repairs or other remedial actions.

### 2.2.11.2 TRAINING

It has always been paramount to the philosophy of EMI to provide the safest possible work environment for its employees. The training program provides facility personnel with the knowledge necessary to understand the processes and materials with which they are working. EMI safety training also covers health hazards and practices for preventing (and the procedures for responding effectively to) emergency situations. In addition, the nature of EMI's business necessitates that employees be well trained in using, inspecting, repairing and replacing facility emergency equipment.

Management training often takes place in informal sessions such as corporate staff meetings, compliance meetings or self-directed learning sessions. These sessions often are of better quality for mangers and can be documented by the trainee (self-certification) and serve as total fulfillment of that particular training need.

Initial training of employees is completed within 90 days of their hire date. Each employee participates in an annual review of his or her initial training. Continuous instruction in safety is provided through monthly and tailgate safety meetings. The goal is to have personnel trained to perform their specific job functions in a compliant manner and maintain the facility in a constant state of preparedness.

#### 2.2.11.2.1 "Facility Personnel" Defined

"Facility Personnel" are employees of EMI who have completed the training requirements under this plan. The regulations regarding the Facility personnel training require that employees responsible for managing hazardous waste be trained to the degree necessary that they can manage hazardous waste in compliance with regulations. For the purpose of this training program, the term "facility personnel" applies to those employees who work on-site for the purpose of managing (e.g. waste sampling, unloading, manifesting, etc.) hazardous waste.

#### 2.2.11.2.2 Training Program Implementation

Upon employment, an electronic training record is created for the employee. The training record includes a job description, a chronological summary of all training, and a summary of required training. Training may begin before the employee works with hazardous waste but must be completed within 90 days of their start-work date.

Employees do not work in an unsupervised position until the required training is completed. Each employee will participate in a review of his or her initial training at least annually (once per calendar year). Certificates of completion are issued upon completion of training and are included in the employee's training file.

EMI's employees are to be trained with safety and environmental protection as the primary concern. To ensure that a basic core-training program is available to our employees, EMI sponsors and/or administers a comprehensive training program. A person may attend an off-site seminar or training course, which contains equivalent information contained in one or more of the on-site training sessions. This training may serve as total fulfillment of that particular training need, if it is documented appropriately. The following descriptions are the basic courses EMI personnel undertake.

#### 2.2.11.2.3 Company Orientation

All personnel, upon initial employment, are introduced to the company philosophy and method of operation as well as specific training regarding this plan and the WEP (Attachment 22).

#### 2.2.11.2.4 Operating Practices Summary

All operators (e.g. heavy equipment operators, conveyor operations, etc.) will be required to be familiar with the operating practices for their respective units. Each operator will be instructed in the modules applicable to their unit, and discussions will be held to answer questions.

#### 2.2.11.2.5 Unit and Equipment Operations

All personnel involved in the operation of hazardous waste or process equipment are required to be cognizant of proper operating procedures, emergency procedures, and maintenance particular to the unit or machinery he or she operates. Initial training covers operation of new or unfamiliar units, processes or pieces of equipment. However, experienced personnel are also required to review the training topics (e.g. Safety Meetings).

#### 2.2.11.2.6 RCRA Personnel Training Requirements

Facility personnel must successfully complete a program of classroom instruction and on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with regulations. Facility personnel must successfully complete the program within 90 days of the date of their employment or reassignment. The program is designed to ensure that facility personnel are able to respond effectively to emergencies and to perform their duties in a way that ensures the facility's compliance with the requirement of this part (40 CFR Part 264).

#### 2.2.11.2.7 Emergency Response and Contingency Plan

All personnel are required to understand the Emergency Response and Contingency Plan to the degree that it affects them and be prepared to put it into action at all times. The Plan covers response to spills, fires, releases and other emergency situations. The

Plan also discusses notification, evacuation, and cleanup procedures. This area of training includes instruction in the procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; emergency communications and alarm systems and signals; and procedures to be followed in the event of a shutdown of operations, as applicable.

#### 2.2.11.2.8 Respiratory Equipment

For protection in atmospheres known or suspected to contain hazardous substances, designated personnel are instructed in the care and use of respiratory protection equipment. The Training Officer is an individual qualified due to their job skill or professional training. Training stresses proper use and fit and procedures for inspection and maintenance. The types of respiratory protection necessary are unique to each activity, depending on the inherent hazards of the materials handled and the environment, area in which the material is located. For this reason, respiratory protection procedures are reviewed periodically and updated, as necessary. Each person has the option to upgrade PPE at any time but cannot reduce unless a manager approves. EMI utilizes state of the art fit testing particulate counter equipment so that all persons can be fit tested on a routine basis.

#### 2.2.11.2.9 Chemical Terminology, Handling, and Toxicology

This training provides a basic understanding of relevant terminology and inherent properties of the waste groups managed on site. Precautions to be taken in handling hazardous wastes and the reasoning for such measures are emphasized. Specific consideration is given to the procedures and practices governing the transfer/processing materials.

The Training Officer or other qualified personnel conducts all training. Videos, slide presentations, etc., may be used to conduct training sessions. Discussions of toxicology and inherent hazards are tailored to meet the types of materials received for transfer or processing on site.

#### 2.2.11.2.10 Training Records

Training records are maintained for each employee meeting the definition of EMI personnel. Each record includes the job title of the employee, a description detailing the required skill, education, other qualifications and duties related to that job title and the amount of both introductory and continuing training that will be given to that employee. The file also contains documentation of the training completed and/or job experience.

When personnel miss a refresher course (e.g. due to illness, vacation), they may review that topic with their supervisor, the Training Coordinator or other qualified individuals. Such reviews are documented in the individual personnel training records.

Training records on current personnel will be kept until closure of the facility. Training records on former employees will be kept for at least three years from the date the employee last worked at the facility.

### 2.2.11.3 SECURITY

#### 2.2.11.3.1 Site Access

EMI is fenced with four–strand barbed wire fence along the East, North, and West perimeters of the site. The fence adjacent to Highway 33 is a three-rail polyvinyl chloride decorative fence. The only access to the property is through the main white metal gate that facilitates access onto Highway 33.

The gate is electrically operated and is routinely open from 0800 hours until 1700 hours Monday thru Friday. On Saturday and Sunday, as well as after working hours, that gate is closed and secured to prevent unauthorized entry by persons or livestock. Signs are posted around the active portion of the facility, with the words "Danger- Unauthorized Personnel Keep Out." Should non-EMI staff require entrance to the waste storage areas of the Facility, they will be escorted by EMI employees at all times.

#### 2.2.11.3.2 Hours of Operation

The normal hours of operation for EMI are from 0800 hours through 1700 hours, Monday through Friday. Since EMI is primarily an emergency response company, the Facility may be open during hours other than those stated above for loading / unloading of EMI equipment utilized in its emergency response activities as well as to receive incoming waste, should demand require it and available capacity allow it.

The *EMI Facility Security Plan* is provided as Attachment 16.

#### 2.2.11.3.3 Waste Packaging

All waste is brought into the EMI Transfer Station Facility in closed containers such as drums or totes, within tarped rolloffs or materials secured on wooden pallets. All shipments are accompanied by waste manifests or EMI Shipping Tickets, which clearly itemize the materials received. As the waste/materials arrive in a secured manner, there is no litter problem or disease vector problems normally associated with municipal landfills.

## 2.2.12 OAC 252:205-15-2(b)(4) Preparedness & Prevention and Contingency Plans

A preparedness and prevention plan and a contingency plan that meets the requirements of 40 CFR 264, Subparts C and D;

### 2.2.12.1 PREPAREDNESS & PREVENTION

#### 2.2.12.1.1 Communication Equipment

See Section 2.2.11.1.2 Communications and Alarm Systems.

#### 2.2.12.1.2 Fire Control Equipment

See Sections 2.2.11.1.2.1.2 Fire Protection Equipment, 2.2.11.1.2.1.3 Spill Control Equipment, and 2.2.11.1.2.1.4 Decontaminated Equipment. In addition, fire pumps are kept in the equipment inventory for use in emergency situations.

#### 2.2.12.1.3 Water

The EMI facility is equipped with two water wells, both containing pumps with adequate pressure to supply water hose streams. The three stormwater retention ponds are an available source of water, as well.

#### 2.2.12.1.4 Testing and Maintenance of Equipment

See Section 2.2.11.1.2 Facility Safety and Inspection.

#### 2.2.12.1.5 Access to Communications and Alarm System

See Section 2.2.1.7, Building 3, Mix Room. Additionally, all personnel with the potential to be working in the area where hazardous wastes are handled are issued cellular telephones to be carried at all times while on duty. Individuals working with hazardous wastes are not authorized to work alone.

#### 2.2.12.1.6 Required Aisle Space

See Section 2.2.1.7 Building 3, Dock 2.

#### 2.2.12.1.7 Arrangements with Local Authorities

See Attachment 18 Contingency Plan.

### 2.2.12.2 CONTINGENCY PLAN

The EMI Emergency Action and Site Contingency Plan is provided as Attachment 18.

## 2.2.13 OAC 252:205-15-2(b)(5) Spill Control, Containment & Remediation

A description of spill control, containment, and remediation measures:

### 2.2.13.1 SPILL CONTROL

Spill control equipment includes the following:

All processing of containerized waste occurs on concrete surfaces with concrete curbing. Should waste be spilled on the concrete during processing, it will be swept, scooped, or absorbed; placed in appropriate containers, staged for waste disposal within the appropriate location of the EMI facility; and arrangements will be made for proper disposal.

Spill control material (e.g. stabilization agents) inventories are inspected weekly for adequate supply.

All of the above listed equipment is maintained, repaired or replaced, as necessary.

#### 2.2.13.1.1 Decontamination Equipment

Personnel decontamination equipment, such as eye wash stations and safety showers, are located throughout each of the EMI operational facilities. They are inspected weekly for operability.

All of the above listed equipment is maintained, repaired or replaced, as necessary.

#### 2.2.13.1.2 Miscellaneous Emergency Equipment

Besides those items specifically annotated in the state and federal regulations, EMI has other miscellaneous equipment that may be implemented during an emergency. For example, site vehicles and equipment can be utilized to carry victims or equipment from one place to another. Heavy equipment may be utilized to dig a ditch or build a berm. While this equipment is not set aside for emergency use only, it is normally present at the EMI facility. It is not, however, included in the facility inspection schedule.

Other miscellaneous pieces of equipment, which do not fall directly under the headings of the state and federal regulations, are maintained on site for the primary, if not sole purpose of responding to emergencies.

Self-Contained Breathing Apparatus (SCBA) are available and inspected weekly for adequate pressure, for proper operability and condition, to ensure regulators are unobstructed, and to check masks and hoses for serviceability.

First Aid Kits are available throughout the facility and are inspected for missing items and adequate supply. Automatic External Defibrillators are also available.

### 2.2.13.2 CONTAINMENT MEASURES

EMI has implemented a Spill Prevention and Control Countermeasures (SPCC) Plan (see Attachment 17). A few of these control and containment measures include:

- Collection system "sumps" in areas where hazardous wastes are stored or managed are inspected daily for evidence of liquids. Liquids present within the sump, other than de minimis levels or rainwater from recent or active storms, are removed within 24 hours of discovery. Liquids from recent or active storms will be removed within 72 hours of discovery.

- Containment areas are also inspected daily for evidence of waste spills or container leakage (see Attachment 14). Should evidence of spills or leaks be discovered, the spill will be contained and/or the leak will be stopped, and the contaminated media will be immediately removed, containerized, and staged for appropriate disposal.

- The waste processing areas are designed to prevent precipitation run-on and runoff.

- All tanks are either staged on concrete or use earthen berms for secondary containment.

- Truck and rolloff box staging areas are graded, to prevent runoff. Runoff from these areas flows to a retention pond shown on the site drawing.

### 2.2.13.3 REMEDIATION MEASURES

In the event of a release to soil of hazardous or nonhazardous materials, the area will be immediately secured. The affected soil will be excavated and placed into waste containers. When the material released is hazardous, collection and analysis of samples from the bottom of the excavation and areas adjacent to the spill perimeter will be performed. After analysis has confirmed that contamination is absent, the excavation will be filled with clean soil.

Soils will be analyzed for the characteristics of hazardous waste identified in 40 CFR Part 261 and/or those associated with the waste generator profile and/or Safety Data Sheet of the spilled material. If the concentration of any contaminants exceeds the TCLP level, the affected soil will be managed as hazardous waste.

The appropriate waste codes will be assigned to the excavated soil. Sampling, analysis, and evaluation, in combination with excavation of soil as necessary, will continue until the area is below the threshold value for the hazardous characteristics.

## 2.2.14 OAC 252:205-15-2(b)(6) Waste Transfer & Unloading Activities

A description of waste transfer and unloading activities which demonstrates that those activities are limited to areas with adequate secondary containment structures that prevent releases to soil, surface water or groundwater

### 2.2.14.1 VSQG MATERIALS

VSQG materials (hazardous and nonhazardous) from multi-state very small quantity generators are unloaded upon arrival in the appropriate location based on hazardous category. Locations include Dock 2, Mix Room, and Nonhazardous Staging Area. See Sections 2.2.1.7 and 2.2.1.8 for detailed descriptions of these areas and their secondary containment structures.

### 2.2.14.2 RCRA-REGULATED HAZARDOUS WASTES

Adjacent to the western end of Dock 2 sets a waste transport van trailer. SQG and LQG manifested hazardous waste arrives at the EMI Transfer Station Facility (e.g. waste for which EMI is acting only as the waste transporter). Once the waste containers are checked and verified and sorted they are loaded onto the van trailer planned to be utilized for in-transit delivery. All DOT regulations, including those for appropriate waste transport, segregation and the use of DOT 'shippable' containers are complied with per 40 CFR 172-179, while arrangements are made to ensure safe transport of all wastes to an appropriately permitted disposal facility.

Transfer activities associated with SQG/LQG RCRA-Regulated waste would occur only if a container was found to be leaking in transit. The container would either be overpacked or the materials transferred into a new container. Since SQL/LQG 10-day transport waste is on a transport unit adjacent to Dock 2, this activity would occur on Dock 2 to minimize the impact of any leakage. See Section 2.2.1.7 for a detailed description of Dock 2 and its secondary containment structures.

### 2.2.14.3 NONHAZARDOUS SOLIDS

Containers of nonhazardous solids are unloaded onto the Nonhazardous Staging Area. See Section 2.2.1.8 for a detailed description of the Nonhazardous Staging Area and its secondary containment structures. Tarped rolloffs of nonhazardous solids are unloaded in a graveled area to the west of Building 4 and 5.

### 2.2.14.4 NONHAZARDOUS LIQUIDS

Containers of nonhazardous liquids are unloaded onto the Nonhazardous Staging Area. See Section 2.2.1.8 for a detailed description of the Nonhazardous Staging Area and its secondary containment structures.

Bulk nonhazardous liquids are transferred to the appropriate storage tank on Dock 1. See Section 2.2.1.6 for a detailed description of Dock 1 and its secondary containment structures.

### 2.2.14.5 NHIW – SOLIDS

Containers of NHIW solids are unloaded onto the Nonhazardous Staging Area. See Section 2.2.1.8 for a detailed description of the Nonhazardous Staging Area and its secondary containment structures.

Tarped rolloffs of NHIW solids are unloaded in a graveled area to the west of Building 4 and 5.

### 2.2.14.6 NHIW – LIQUIDS

Containers of nonhazardous liquids are unloaded onto the Nonhazardous Staging Area. See Section 2.2.1.8 for a detailed description of the Nonhazardous Staging Area and its secondary containment structures.

Bulk nonhazardous liquids are transferred to the appropriate storage tank on Dock 1. See Section 2.2.1.6 for a detailed description of Dock 1 and its secondary containment structures.

### 2.2.14.7 RECYCLABLES

Empty metal and poly drums are unloaded onto the Nonhazardous Staging Area. See Section 2.2.1.8 for a detailed description of the Nonhazardous Staging Area and its secondary containment structures.

Empty containers that previously held a hazardous material are unloaded onto Dock 2. See Section 2.2.1.7 for a detailed description of Dock 2 and its secondary containment structures.

### 2.2.14.8 USED OIL

Used oil principally in 55 gallon drums is offloaded in the Nonhazardous Staging Area. See Section 2.2.1.8 for a detailed description of the Nonhazardous Staging Area and its secondary containment structures.

Bulk used oil shipments are off-loaded on the west end of Dock 1and into the appropriate tanks located on Dock 1. See Section 2.2.1.6 for a detailed description of

Dock 1 and its secondary containment structures. The used oil is transferred from the shipping containers to the oil/water separator Tanks 4 or 7 located on Dock 1. The separated oil is transferred to one of two Used Oil storage tanks (Tank 12 and 13) on Dock 1 awaiting transfer to a used oil recycling facility. The decanted water is transferred to Tank 3 adjacent to Dock 1. Used oil is shipped off-site by a registered used oil transporter within 35 days.

### 2.2.14.9 UNIVERSAL WASTE

Universal Waste is unloaded in the Nonhazardous Universal Waste Storage and Processing area in Building 5. See Section 2.2.1.10 for a detailed description of Building 5. Hazardous Universal Wastes (e.g. lead acid batteries) are prepared for shipment and stored on Dock 2. See Section 2.2.1.7 for a detailed description of Dock 2 and its secondary containment structures.

### 2.2.14.10 TRASH AND DEBRIS

Securely closed containers of trash and debris are accepted at the EMI Transfer Station Facility. These containers are unloaded into the Nonhazardous Staging Area. See Section 2.2.1.8 for a detailed description of the Nonhazardous Staging Area and its secondary containment structures.

Tarped rolloffs of trash and debris are unloaded in a graveled area to the west of Buildings 4 and 5. As this graveled area consists of a clay-base overlain with 6" of crusher rock, no dust is generated by the management of trash and debris at the EMI Transfer Station Facility. Additionally, as the trash and debris arrive within closed containers, there are no problems with litter or disease vectors.

### 2.2.14.11 NON-EMI TRANSPORTED CONTAINERS

The containers are unloaded in an appropriate storage area and inspected to ensure the contents of the shipment meets all EMI Waste Exclusion Plan criteria.

## 2.2.15 OAC 252:205-15-2(b)(7) Closure Mechanisms to Meet Financial Assurance

Information on closures and mechanisms to meet the financial assurance and liability requirements of 40 CFR 264, Subparts G and H;

EMI has worked with and obtained the approval from ODEQ to fund closure of the EMI Transfer Station when the decision is made to do so. EMI has established an appropriate financial mechanism to ensure that closure costs associated with the closure of the EMI Transfer Station, will be available and the site closure can be completed in accordance with the statutory rules and requirements at that time. Details concerning the EMI Facility Closure Plan are presented below, while the Transfer Facility Closure Cost Estimate and Financial Assurance is presented as Attachment 28.

EMI will close the Transfer Station in a manner that minimizes the need for further maintenance and controls, minimizes, or eliminates a threat to human health or the environment. The Transfer Station will be closed such that, following closure, hazardous waste or constituents will not be released into the air, surface water,

ground water, or soil in sufficient quantities to threaten human health or the environment. This objective will be accomplished using a variety of mechanisms as discussed below.

This Closure Plan only addresses that portion of the Facility, which meets the definition of a Transfer Station as established under the ODEQ Rules and Regulations for Hazardous Waste Management (252:205-1-2). EMI also operates a transfer facility and functions as a large quantity generator at the same location. The transfer facility may operate as a separate activity before, during, and after closure of the Station. Other activities may be involved with the operation of the Facility under the provisions of 40 CFR 262.34 applicable to generators of hazardous waste.

### 2.2.15.1 Final Closure Activities

In the context of the operations at EMI, final closure will constitute the final cessation of all Transfer Station activities. The Closure Plan addresses the need for decontamination and sampling associated with the following structures:

1) Building #3 (including Mix Room & Dock 2) - used to manage VSQG/LQG waste,

2) Dock# 1 - used for non-hazardous drum storage and tanker/equipment washing,
3) Nonhazardous Waste Staging Area, and
4) Tanks 4, 7, 12, & 13 used for Nonhazardous liquid storage.

### 2.2.15.2 Closure Plan Amendment

EMI will amend its Closure Plan whenever the Transfer Station design or operations significantly change such that the existing Plan would not achieve the closure performance standard, or the expected year of final closure changes, or unexpected events realized during closure activities require the Plan to be modified. If modification of the Plan is needed, EMI will submit a proposed modification to the ODEQ for approval.

### 2.2.15.3 Maximum Extent of Operations

The maximum extent of operations will be when the station is transferring, processing and/or treating solids and sludges.

### 2.2.15.4 Maximum Waste Inventory Capacity

The maximum inventory of waste that could be present at the Transfer Station at any one time during its active life is limited to the following.

| | | |
|---|---|---|
| VSQG & LQG HW (Dock 2) & Mix Room | 125 drums (55-gal drum) | 6,875 gal |
| SQG & LQG HW (in-Transit Trailer) | 88 drums (55-gal drum) | 4,840 gal |
| Nonhaz Solids (NH Staging Area) | 420 drums (55-gal drum) | 73.5 Tons |
| Nonhaz Bulk Solids (Rolloffs & Tank 1) | ----- | 240 Tons |
| Recyclable Metals & Plastics | 4 Rolloffs | 35 Tons |

| | | |
|---|---|---|
| Used Oil & NHaz Wash Water (Tanks 3, 4, 7, 12 & 13) | | 16,000 gal |
| Universal Wastes – Lightbulbs (Bldg 5) | 7000 bulbs | 5 $yds^3$ |

### 2.2.15.5 Expected Year of Final Closure

For the purposes of this Plan, at this time, the Transfer Station is expected to close in 2045. Should this date change in the future, EMI will inform the ODEQ of the revised anticipated year of final closure.

### 2.2.15.6 Closure Schedule

As will be described in further detail below, several steps are involved in the final closure of the facility. Based on these steps, an estimate of the number of days required for final closure is presented below in Table 3.

**Table 3. Estimated Time for Requirements for Final Closure of Station**

| ACTIVITY | DAYS |
|---|---|
| Notice of intent to close sent to ODEQ waiting period of 60 days | *60 |
| Removal of waste from Transfer Station | *30 |
| Dismantle/dispose of equipment etc. | *10 |
| Decontaminate floors, walls, etc., of buildings/docks and any salvageable equipment, etc. | *10 |
| Collect rinse water and soil samples | *10 |
| Analysis of samples | 30 |
| Additional decontamination of cleanup (contingent) | 10 |
| Additional analysis of samples (contingent) | 30 |
| Certification of closure | 60 |
| **TOTAL** | **270** |
| *Actual closure process – 90 days | |

### 2.2.15.7 Notice of Intent to Close

EMI will notify the ODEQ at least 60 days prior to the date on which it expects to begin final closure of the EMI Transfer Station. Modifications to the approved Plan or timeline could be requested at this time, if justified by facility operations or conditions, as described above, and approved by ODEQ.

### 2.2.15.8 Removal of Wastes from Transfer Station

After the decision is made by EMI to conduct final closure of the Transfer Station, several major steps must be undertaken to ensure that the site will meet the closure performance standard. The closure steps may occur sequentially or concurrently. The first step of the closure process will be to remove wastes. This applies to the following structures.

- Building 3 - Mix Room & Dock 2,
- Building 5 - Central Bay,
- Nonhazardous Staging Area,
- Rolloff Staging area,
- Tank 1 (AST) containing Fly Ash,
- Tanks 4, 7, 12, 13 (ASTs) containing Used Oil, and
- Tank 3 (AST) containing Nonhazardous liquid wastes.

Removal of the wastes from the Transfer Station will not require any unusual operational activity. In addition, the decision to close will most probably occur at a point when the station is not in active use, and there will not be any inventory of waste to remove. However, should the decision to close occur at a point when the

Transfer Station is at maximum waste inventory, the wastes will be transported to an approved disposal facility, on a manifest or waste shipping ticket, as appropriate.

It may be worth noting that EMI manages containerized waste, thus removal of inventory from the site does not involve extraordinary measures. It is a simple matter of arranging to have the containerized wastes shipped off site. Nonhazardous liquid wastes will also be disposed offsite and the tanks will be rinsed after empty to remove any residues.

### 2.2.15.9 Dismantling/Disposal of Equipment

The second step of the closure process will be to dispose of certain mobile and/or fixed equipment, etc. This applies to Dock 1, Building 3 including Dock 2, the Nonhazardous Staging Area, the Rolloff storage area, and the four Tanks containing nonhazardous liquid wastes. The decision to dismantle/dispose versus decontaminate and salvage, etc. will be based on many factors, some of which are salvage value of the equipment, cost of decontamination, ability to decontaminate and ability to demonstrate decontamination. For those items for which dismantling/disposal is the preferred option, EMI will ship the material to a disposal facility that is permitted to accept it.

### 2.2.15.10 Decontamination of Structures/Equipment

The third step of the closure process will be to decontaminate the structures and/or equipment such that the closure performance standard is met. The permanent structural components of the station (floors, walls, etc.) will most likely be decontaminated and left in place. Other equipment may be decontaminated and salvaged for use elsewhere, or once decontaminated, could be disposed of as non-hazardous wastes. Successful completion of the decontamination process will remove the equipment or structures from the regulatory framework of RCRA.

EMI will employ a cleaning process, which adequately removes contamination, and then, verify that the decontamination was sufficient using analysis of the rinse water. The cleaning processes employed during closure could be multi-phased and may include the use of methods such as scraping, sandblasting, sweeping, wiping, brushing, high-pressure washing, steam cleaning, etc. as necessary, to remove the contamination.

At the completion of the cleaning process, the structures and/or equipment will be rinsed with fresh water. To determine whether the cleaning process has resulted in adequate decontamination, the rinse water will be analyzed for a variety of hazardous constituents as listed in Table 4 below. These are believed to be the best indicators of the success of the cleaning process.

### 2.2.15.11 Clean-up Criteria

If the concentrations of the constituents in the rinse water are equal to or less than the levels listed in Table 4, the cleaning process is considered to be adequate and the decontaminated structures and/or equipment are no longer within the regulatory framework of RCRA.

If the concentrations of the constituents in the rinse water are greater than the levels listed in Table 4, the cleaning process is considered to be inadequate and the structures and/or equipment are still within the regulatory framework of RCRA. In the latter case, additional cleaning or rinsing and analysis will be conducted until the rinse water meets the standards in Table 4, or the equipment, structures, etc. could be dismantled/disposed as described above.

**Table 4. Rinse Water Constituent Concentrations to Demonstrate Adequate Decontamination**

| Constituent / Analysis TCLP | Concentrations (mg/1) |
|---|---|
| Arsenic | 0.5 |
| Barium | 10.0 |
| Cadmium | 0.1 |
| Chromium | 0.5 |
| Lead | 0.5 |
| Mercury | 0.02 |
| Selenium | 0.1 |
| Silver | 0.5 |
| Total Cyanide | 10.0 |
| Total Organic Halogens | 10.0 |
| Total Organic Carbon | 100.0 |

### 2.2.15.12 Soil Sampling

The final step of the closure process will be to collect soil samples in the immediate area around the affected units. This applies to Dock 1, Building 3-Dock 2, the Nonhazardous Staging Area, and the Rolloff Staging area. The samples will be collected near the process areas. Three soil samples, collected from a depth of 0" to 6", will be collected at the entrance to each. In addition, the area around the building will be visually inspected for any evidence of spills. Should evidence of spillage be discovered at the time of closure, the affected soil will be sampled in place and analyzed or excavated first, followed by collection and analysis of samples from the bottom of the excavation. Site excavations will be filled with clean soil after analysis has confirmed that contamination is absent.

Soils will be analyzed via TCLP for the characteristics of hazardous waste identified in 40 CFR Part 261. If the concentration of any contaminants exceeds TCLP Standards, the affected soil will be managed as hazardous waste. The appropriate waste codes will be assigned to the excavated soil. Sampling, TCLP analysis, and evaluation, in combination with excavation of soil as necessary, will continue until the area is below the threshold value for the hazardous characteristics.

### 2.2.15.13 Groundwater Monitoring / Leachate Collection / Run-on & Run-off Control

EMI is a Transfer Station. EMI is managing containerized waste and does not dispose of waste on site. As the intent of the closure effort is to provide a "clean" closure of the property, and there has been no placement of waste on the land, it is inappropriate to include landfill post-closure related issues, such as ground water

monitoring, leachate collection and run on/runoff control in the Plan. Consequently these issues have not been addressed.

#### 2.2.15.14 Certification of Closure

Within 60 days of completion of closure, EMI will submit to the ODEQ a certification that the Transfer Station has been closed in accordance with approved closure Plan. The closure certification will be signed by EMI and an independent registered professional engineer, and the records and documents will be retained at the facility until requested by DEQ, when they will be provided in their entirety.

#### 2.2.15.15 Estimated Cost of Closure and Financial Assurance

Estimated Facility closure cost breakdown and financial assurance is provided in Attachment 28.

## 2.3 OAC 252:205-15-2(c) Applicable Solid Waste Regulations for Transfer Station

The owner/operator of a hazardous waste Transfer Station which handles solid waste destined for management at a solid waste facility must also demonstrate compliance with applicable rules in 252:515, including location standards, if the Plan is to be used in lieu of a solid waste permit.

Demonstration that EMI meets the applicable rules cited in OAC 252:515 is addressed in previous sections of this D&O Plan. The specific location of each element of this information is within the DEQ Checklists provided as Attachment 5.

## 2.4 OAC 252:205-15-2(d) Waste Consolidation

If the owner/operator consolidates hazardous wastes such that the quantity of consolidated wastes exceeds the quantity provisions of 40 CFR 262.17(a), the owner/operator of the Transfer Station shall be considered the generator of the newly-regulated waste and must comply with all applicable provisions of 40 CFR 262.17(a).

As discussed in multiple sections herein, Environmental Management is a Large Quantity Generator due to consolidation of VSQG wastes and the assumption of generation status of those consolidated wastes. See Section 2.2.2.3 EMI-Generated LQG Hazardous Waste. This hazardous waste is accumulated in containers on Dock 2 for no longer than ninety (90) days. No hazardous waste is accumulated in tanks, on drip pads, or in containment buildings.

EMI complies with all applicable Air Emissions Container Level 1 standards through the use of DOT Performance Oriented Packaging and proper covers and closure devices. Further compliance is demonstrated below and throughout this Plan.

Containers are inspected as discussed in Section 2.2.11.1.2.2 Container Inspection.

In EMI's Satellite Accumulation area (Building 3, Mix Room), containers are kept closed unless wastes are being added or removed. In the Accumulation area (Dock 2), containers of waste are always closed and are stored in such a way to separate incompatible wastes. See Section 2.2.6.2 Compatibility Analysis for information pertaining to ignitable and reactive waste handling and precautions. A variance to the 50-feet perimeter requirement was granted by the ODEQ in 2011 (See Attachment 1).

The weekly facility inspections are discussed at length in Section 2.2.11.1.2 Facility Safety and Inspection.

Personnel training is discussed at length in Section 2.2.11.2 Training.

See Section 2.2.15 Closure for information related to the closure of the facility.

## 2.5 OAC 252:205-15-3 OTHER ENVIRONMENTAL REQUIREMENTS

(a) The owner/operator of a Transfer Station remains subject to all relevant statutes and rules regarding releases to air, water, and land.

EMI understands this premise and respects it. This is demonstrated by EMI's participation in the OPDES Multi-Sector General Permit Program, and the subsequent environmental monitoring occurring per the requirements of the EMI Storm Water Pollution Prevention Plan (Attachment 15), and additional monitoring conducted beyond the requirements.

(b) Any radioactive materials received at the Transfer Station shall be managed according to all appropriate requirements of the federal Nuclear Regulatory Agency and DEQ's Radiation Management rules.

EMI understands this premise and respects it. Should conditions necessitate that EMI accept radioactive materials, this requirement will be strictly adhered to.

## 2.6 OAC 252:205-15-4 MODIFICATIONS

(a) A proposed modification to an approved Plan which would alter the design, infrastructure, or operation of a Transfer Station shall be requested in writing and shall not be implemented without the DEQ's prior approval.

EMI respects this requirement and will continue to fully adhere to it.

(b) The DEQ may modify an approved Plan to require compliance with current rules.

EMI respectfully acknowledges DEQ's authority to implement this requirement as it deems necessary.

(c) Modification to approved Plans shall be according to 40 CFR 270.42.

EMI respects this requirement and will continue to fully adhere to it.

## 2.7 OAC 252:205-15-5 EXCLUSIONARY SITING CRITERIA

(a) The siting criteria for locating hazardous waste Transfer Stations are the same as those for any hazardous waste treatment, disposal, recycling, or storage facility in OAC 252:205-11-2 and 27A O.S. Section 2-7-111.

Compliance with applicable rules in 252:205-11-2 Exclusionary Siting Criteria, and 27A O.S. Section 2-7-111 and Section 2-7-114 are addressed below.

**Rule 252:205-11-2(a) Ground Water Resources and Recharge Areas**

The EMI Facility is not located in an area where unconsolidated alluvium or terrace deposits are located, as determined by the Oklahoma Geological Survey (1983), on Sheet 1 of the map, "Principal Ground-Water Resources and Recharge Areas in Oklahoma."

The EMI Facility is not located in the bedrock aquifer or recharge area for the Garber/Wellington formation, as determined by the Oklahoma Geological Survey (1983), on Sheet 2 of the map, "Principal Ground-Water Resources and Recharge Areas in Oklahoma."

**Rule 252:205-11-2(b) Water Wells**

This requirement addresses new hazardous waste disposal facilities. As EMI is operating as an existing Transfer Station and no waste disposal occurs at EMI, this rule does not apply.

**Rule 252:205-11-2(c) Flood Plain**

This rule states "no permit… which includes disposal of hazardous waste within a one-hundred year flood plain shall be granted." As EMI is operating as an existing Transfer Station and no waste disposal occurs at EMI, this rule does not apply. Regardless of the inapplicability of this rule, it has been assessed and determined that the EMI Facility is not located within the 100-year floodplain. The determination has been provided in the form of a FEMA map and attached correspondence from the Floodplain Administer for Logan County (See Attachment 7).

**Rule 252:205-11-2(d) Surface Water**

As EMI is operating as an existing Transfer Station and no waste disposal occurs at EMI, this rule does not apply. Regardless of the inapplicability of this rule, it has been assessed and determined that EMI is not located within one mile of any reservoir that serves as a public water supply. While the City of Guthrie obtains its water from Guthrie Lake, it is located within a separate watershed and at a distance of approximately seven miles from the EMI Facility.

EMI is not located within one mile of a scenic river. A letter from the Oklahoma Scenic River Commission is included in Attachment 20 in support of this statement.

**Rule 252:205-11-2(e) Air Pollution**

As EMI is operating as an existing Transfer Station and no waste disposal occurs at EMI, this rule does not apply. Regardless of the inapplicability of this rule, it has been assessed and determined that the EMI facility is not located within one mile of a public school, educational institution, nursing home, hospital or public park.

**Rule 252:205-11-2(f) Compliance with the Hazardous Waste Management Act**

The exclusionary siting criteria associated with 27A O.S. the "Hazardous Waste Management Act" Section 2-7-111(B) and 2-7-111(C)(1) are associated with the prohibition of siting a hazardous waste facility above a principal groundwater resource or recharge area, as determined by the Oklahoma Geological Survey. The EMI Facility is not located in the bedrock aquifer or recharge area for the Garber/Wellington formation, as determined by the Oklahoma Geological Survey (1983), on Sheet 2 of the map, "Principal Ground-Water Resources and Recharge Areas in Oklahoma."

The exclusionary siting criteria for 27A O.S. Section 2-7-114 is associated with the inability to obtain a permit for a new hazardous waste incineration facility and/or a new waste disposal facility that is located within 8 miles of the corporate limits of an incorporated city or town. As EMI is operating as an existing Transfer Station and no practice of incineration or waste disposal occurs at the EMI Facility, this rule does not apply.

# 3.0 ADDITIONAL ENVIRONMENTAL CONSIDERATIONS

## 3.1 OAC 252:205-5-1 Disposal Plan

All persons generating hazardous waste in Oklahoma or generating hazardous waste to be stored, treated, recycled or disposed of in Oklahoma shall file a disposal plan with the DEQ on DEQ forms and shall obtain the DEQ's approval prior to offering waste for transport.

EMI understands this requirement and has a current Disposal Plan on File with ODEQ (See Attachment 26).

## 3.2 OAC 252:205-5-3 Quarterly Reporting Requirements

All persons generating hazardous waste within Oklahoma including on-site 8 treatment, storage, recycling, or disposal facilities, shall submit a report to the DEQ in a prescribed format which may include electronic submissions. The quarterly report shall be submitted no later than 60 days after the end of each quarter.

EMI understands this requirement and submits Quarterly Reports as required.

## 3.3 OAC 252:205-5-4 No Endangerment Provisions

All generators must comply with 252:205-9-1.

This is addressed in Section 3.3, below.

## 3.4 OAC 252:205-9-1 No Endangerment or Degradation

(a) Hazardous waste sites and facilities shall be located, constructed, maintained, operated, and closed in a manner to prevent any endangerment of the public health and safety or degradation of the environment.

(b) Degradation of the environment shall be deemed to have occurred if the site or facility causes or may cause discharge or release to the air, land, or water which statistically increases (or decreases, in the case of pH) the level of a parameter indicative of hazardous waste contamination over what may normally be expected to be found in the environment at that time.

(c) A statistical increase (or decrease) shall be determined by use of tests specified in 40 CFR Parts 264 and 265.

(d) Discharges in compliance with state or federal permits and rules shall not be deemed as degradation.

EMI is acutely aware of the value of preserving the integrity of the environment. EMI implements prevention, control, and is poised to implement remediation steps as necessary, per the directives provided in the following plans:

- Attachment 12 Used Oil Analysis Plan
- Attachment 14 Terminal Inspection Checklist
- Attachment 15 Storm Water Pollution Prevention Plan
- Attachment 16 Facility Security Plan

- Attachment 17 Spill Response Plan
- Attachment 18 Emergency Action Plan – Site Contingency Plan
- Attachment 22 Waste Exclusion Plan
- Attachment 24 Health and Safety Plan
- Attachment 28 EMI Facility Closure Cost Estimate & Financial Assurance

## 3.5 OAC 252:205-7-2 Leakage, Other Releases Prohibited in Transport

The transporter shall insure that the waste will be adequately contained so as to prevent any leakage, spillage, blowing, or dumping of the waste while in transport.

All DOT regulations, including those for appropriate waste transport, segregation and the use of DOT shippable containers are complied with per 40 CFR 172-179, while arrangements are made to ensure safe transport of all wastes to the EMI Facility and/or an appropriately permitted disposal facility.

## 3.6 OAC 252:205-7-4 Mixing Waste Prohibited by Transporters

Transporters shall not mix or combine incompatible hazardous waste within a common container. Transporters shall not mix or combine hazardous waste from separate containers or transfer waste from one container to another container except at an approved transfer station in accordance with 252:205-15-1(d).

When EMI is acting only as a transporter of hazardous waste, the waste itself is only handled if a container is found to be leaking in transit. As a permitted transfer station, this section allows EMI to transfer the waste into a new container. Most times, the leaking container is simply over-packed for continued transport.

All DOT regulations, including those for appropriate waste transport, segregation and the use of DOT shippable containers are complied with per 40 CFR 172-179, while arrangements are made to ensure safe transport of all wastes to an appropriately permitted disposal facility.

## 3.7 OAC 252:205-9-3 Buffer Zones

(a) No treatment, storage or disposal in a land treatment unit shall occur within 50' of the site perimeter. No treatment, storage or disposal in a surface impoundment, waste pile or landfill unit shall occur within 200' of the site perimeter.

As Dock 1 of the EMI Transfer Station Facility is less than 50 feet from the EMI site perimeter, EMI has previously requested and was granted a variance for this structure by ODEQ in 2001 (see Attachment 1 DEQ Notice of Plan Approval).

## 3.8 OAC 252:515-1-8 Special Considerations

(b)(4) Transfer Stations. Permit Modification applications for transfer stations shall include the information in (1)(I) of this Subsection.

OAC 252:515 Subchapter 29 Exclusion of Prohibited Wastes:

As EMI manages Nonhazardous Industrial Waste (NHIW), in addition to complying with the provisions of the federal RCRA Regulations, EMI is subject to certain Oklahoma Solid Waste Management Rules found in OAC 252:515. This includes meeting the requirements of Subchapter 29, "Exclusion of Prohibited Wastes," which entails the development of a Waste Exclusion Plan (WEP).

The WEP is provided in its entirety as Attachment 22.

# PROJECT INFORMATION SHEET FOR JOB #0042973

| Date of Project | Keeton Hill, Justin Barnes |
|---|---|
| 05/03/19 | Date Time Submitted: 5/2/2019 3:59:53 PM |

| Generator | | Client | |
|---|---|---|---|
| Name | 3Js LLC | Name | |
| Address | 24251 Indepance | Address | |
| City/St/Zip | Morrison OK 73061 | City/St/Zip | |

| Contact Name | Contact Phone |
|---|---|
| | |

**Important Information**

| | |
|---|---|
| Location | Eagle Rd and Hwy 51, Yale, OK |
| Directions | |
| Objective/ Project | Remove tree and contaminated soil. Fix fence |
| PPE Required | D |
| Personnel Requested | Operator for trackhoe operator for roll off and technician |

| Shipping Documents | Qty |
|---|---|
| Shipping Ticket | 2 |

| Supplies | Qty |
|---|---|
| Liner - Rolloff - 4 mil | 2 |
| Sorbent Booms (8 x 10 -4/box) | 1 |
| Sorbent Pads A100 | 1 |

| Equipment | Qty |
|---|---|
| Track Excavator 150 | 1 |
| T-Posts | 1 |
| Tools - Hand / Power | 1 |

| Vehicles |
|---|
| Semi - 48ft Drop deck trailer w/tractor |
| Truck - Rolloff Straight Frame |