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Division of
Solid and Hazardous Waste

JAN 13 2015
2015-001533

January 9, 2015

Scott Anderson
Division of Solid and Hazardous Waste
Utah Department of Environmental Quality
PO Box 144880
Salt Lake City, UT 84114-4880

RE: Part B Permit Renewal
Safety-Kleen Systems, Inc.
1066 South Pioneer Road
Salt Lake City, UT
EPA ID# UTD980957088

Dear Mr. Anderson:

Please accept this submittal as Safety-Kleen Systems, Inc. ("Safety-Kleen") RCRA Part B Permit renewal application for its Salt Lake City Service Center. Subsequent sections of this letter describe requested/required changes to the current Part B Permit issued to Safety-Kleen. Accompanying attachments, with requested modifications shown, are included in this submittal.

Requested Changes

1. Currently Section II.D of Safety-Kleen's RCRA Part B Permit requires specific gravity testing of immersion cleaner and parts washer solvent, as described in II.D.2. If results of specific gravity testing vary +/- 10% from typical results, solvent is then rejected.

Safety-Kleen is requesting that specific gravity testing be removed from its waste analysis requirements. Historically, specific gravity test results do not vary +/- 10% from typical results. The amount of contamination required to cause results +/- 10% of typical specific gravity results would generally cause the waste solvent to be rejected based on appearance, volume, or odor. Volume, odor, and appearance are qualitative observations made while performing parts washer services in the field. Safety-Kleen feels these qualitative parameters are sufficient to determine if spent parts washer solvent has been contaminated.

Safety-Kleen's proposed modifications to this section of the permit are shown on the attached Module II.

2. Safety-Kleen removed the on-site solvent recycling system from its RCRA Part B permit in 2011. A revised Permit Module IV and Attachment 1 included with this submission removes any references made to the on-site solvent recycling system.

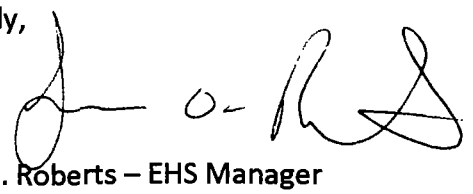
3. To allow for completion of facility inspections electronically, Attachment 5 of Safety-Kleen's permit has been modified to allow for paper and electronic inspection forms. Language in Attachment 5 has also been modified to indicate inspection forms included in the permit are examples; the actual format of the inspection form form may vary. "Attachment 5" of this submission shows changes requested by Safety-Kleen.

4. Attachment 4 of Safety-Kleen's current permit is being modified to account for minor changes in facility personnel titles, and allow flexibility in changing titles in the future without permit modification.

Additionally, Attachment 4 has been modified to identify general topics covered during initial and recurring training, rather than identifying specific training course titles. "Attachment 4" of this submission identifies changes requested by Safety-Kleen.

If you have any questions, or if additional information is requested, please feel free to call me at **847/450-4710, or email** jason.roberts@safety-kleen.com .

Sincerely,



Jason O. Roberts – EHS Manager
Safety-Kleen System, Inc.

cc: Mori Sorenson – Safety-Kleen Director EHS; Electronic Copy

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Division of
Solid and Hazardous Waste

JAN 13 2015

2015-001533

SAFETY-KLEEN SYSTEMS, INC.
1066 SOUTH PIONEER ROAD
SALT LAKE CITY, UT 84104

STORAGE FACILITY
UTD980957088

RCRA PART B PERMIT RENEWAL APPLICATION

safety-kleen.
PROTECTION·CHOICES·PEOPLE
MAKE GREEN WORK·

Division of
Solid and Hazardous Waste

JAN 13 2015
2015-001533

January 7, 2015

Scott Anderson
Division of Solid and Hazardous Waste
Utah Department of Environmental Quality
PO Box 144880
Salt Lake City, UT 84114-4880

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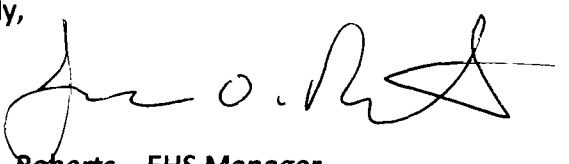

Jason O. Roberts – EHS Manager
Safety-Kleen System, Inc.

cc: Mori Sorenson – Safety-Kleen Director EHS; Electronic Copy

MODULE II

GENERAL FACILITY CONDITIONS

II.A. DESIGN AND OPERATION OF FACILITY

II.A.1. The Permittee shall maintain and operate the container storage areas and the tank system in a manner that minimizes the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water that could threaten human health or the environment. Should any of these incidents occur, the Permittee shall investigate and determine the cause of the incident and implement corrective measures to prevent future occurrences. The Executive Secretary may consider appropriate enforcement action, to include the cessation of waste management activities, until adequate resolution of the problem occurs.

II.A.2. Any equipment not associated with hazardous waste storage, but which could impact the environment surrounding and adjacent to the hazardous waste management units, shall be in good operating condition to prevent leakage of material onto the ground. This may include, but is not limited to, valves, piping, hoses, hose connections, pumps, etc.

II.B. OFF-SITE WASTE RECEIPT NOTICE

II.B.1. When the Permittee is to receive hazardous waste from an off-site source, prior to the waste being shipped by the generator, the Permittee shall inform the generator in writing that the Safety-Kleen Pioneer Road facility has the appropriate permits for, and will accept, the waste the generator is planning on shipping. The Permittee shall keep a copy of this written notice as part of the operating record required by Condition II.M.1.

II.C. PERMITTED AND PROHIBITED WASTE

II.C.1. The Permittee may accept for management at the facility, subject to the conditions of this permit, wastes identified by the following waste codes: D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, and F005.

II.C.2. The Permittee may also accept for management at the facility, subject to the conditions of this permit, used oil and other non-hazardous industrial wastes.

II.C.3. The following shall not be accepted for management at the facility at any time, regardless of the waste codes identified in Condition II.C.1.:

II.C.3.a. Water reactive wastes or materials, defined as DOT Division 4.3, and in R315-2-9(f)(1)(ii)-(iv);

II.C.3.b. Pyrophoric wastes or materials, defined as DOT Division 4.2(1);

II.C.3.c. Explosive wastes or materials, defined as DOT Forbidden, DOT Division 1.1, 1.2, and 1.3 explosives, DOT Division 4.1 Type A and Type B materials, and in R315-2-9(f)(1)(vi)-(viii);

II.C.3.d. Shock sensitive wastes or materials;

II.C.3.e. Radioactive wastes or materials;

II.C.3.f. Wastes or materials exhibiting the property identified in R315-2-9(f)(1)(i);

II.C.3.g. Wastes or materials meeting the definition of infectious as outlined in Utah Code Annotated 19-6-102(12);

II.C.3.h. Compressed gas cylinders ~~or aerosol cans~~; and

II.C.3.i. Any waste carrying a State of Utah or EPA waste code not identified in Condition II.C.1.

II.D. GENERAL WASTE ANALYSIS

II.D.1. The Permittee shall comply with the conditions and procedures found in ATTACHMENT 1.

~~II.D.2. The Permittee shall measure the specific gravity of immersion cleaner/parts washer solvent from all customers who are large quantity generators, at least once each calendar quarter. The Permittee shall measure the specific gravity of immersion cleaner/parts washer solvent from all customers who are small quantity generators at least once per calendar year and the Permittee shall measure the specific gravity of immersion cleaner/parts washer solvent from 10% of all customers serviced during a calendar year who are conditionally exempt small quantity generators. Required specific gravity testing shall occur at the time the Permittee's driver picks up the waste from the customer with all containers of immersion cleaner/parts washer solvent being measured. The Permittee shall document and record the results of specific gravity testing in the facility operating record.~~

~~II.D.2.a. Parts washer solvent with a specific gravity less than 0.75 or greater than 0.85 shall not be accepted. Immersion cleaner with a specific gravity less than 0.90 or greater than 1.10 shall not be accepted. Branch management shall recheck the specific gravity measurements of at least five percent of the total measurements. Results of specific gravity rechecks shall be documented and maintained in the facility operating record.~~

II.D.~~3~~2. The Permittee's driver shall use an inspection checklist to document the following information for each container serviced:

II.D.~~3~~2.a. The drivers name, the date, the name of the customer and the pick-up location, the type of waste, the size (volume) of each container serviced, the initial volume of product delivered, and specific results of the driver's inspection of the waste color and volume for each container serviced;

II.D.~~3~~2.b. Problems observed with containers, basis for rejection, and justification for acceptance despite deficiencies in a column dedicated for "remarks;" and

~~II.D.3.c. The results of the hydrometer measurement for specific gravity as specified in Condition II.D.2., if applicable.~~

II.D.~~4~~3. The Branch Manager or the Branch Manger's designee shall review for accuracy the driver's data, enter the date of such review, and sign each inspection log within seven working days of the waste arriving at the branch. Safety-Kleen shall investigate any deficiencies discovered as a result of such review and document actions taken to prevent the reoccurrence of the discovered deficiencies or actions taken to rectify the discovered deficiencies.

II.D.~~5~~4. The Permittee shall analyze each waste stream managed at the facility through chemical analysis of representative samples as specified in Table 2 -ATTACHMENT 1 once a year to verify Specific Waste Codes and Underlying Hazardous Constituents as part of the facility's ongoing quality assurance program.

II.D.~~5~~4.a. This annual sampling and analysis shall be in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846 or equivalent methods approved by the Executive Secretary. The samples shall be collected at the Permittee's facility during the month of April, and the analytical results shall be submitted to the Executive Secretary by July 1st of each year respectively. Any inconsistencies between the analytical results, hazardous waste determinations and associated facility manifests shall be addressed in a report accompanying the analytical results. Waste codes may be excluded from manifests if the analytical results conclusively demonstrate that waste constituents did not exceed TCLP regulatory levels (i.e., a waste code may be excluded if the concentration detected is below the TCLP regulatory level for that specific constituent or if not detected, the detection limit is below the TCLP regulatory level for that specific constituent).

II.D.~~5~~4.b. The most conservative set of waste codes, indicated by the analytical results obtained from either the Salt Lake Service Center (Pioneer Road facility) or Safety Kleen's National Annual Re-characterization, shall be used on manifests for the year following each analytical report.

II.D.~~5~~4.c. The Permittee shall provide oral and written notification to the Executive Secretary of each sampling date and time at least seven days prior to sampling. The Permittee shall

reschedule in writing, prior to April each year, any sampling that cannot be conducted in accordance with the above schedule.

II.D.~~6~~5. At a minimum, the Permittee shall:

II.D.~~6~~5.a. Maintain properly functioning instruments; and

II.D.~~6~~5.b. Use approved sampling and analytical methods.

II.D.~~7~~6. If the Permittee uses a contract laboratory to perform analyses the laboratory shall be certified by the State of Utah to perform the contracted analyses. For parameters for which certification is unavailable, the laboratory shall provide quality control/quality assurance data sufficient to assess the validity of the data. The Permittee shall inform the laboratory in writing that it must operate under the Waste Analysis Plan conditions set forth in this permit.

II.D.~~8~~7. The Permittee shall obtain, independent of the Service Agreement, a certification, signed by each customer at the time of servicing parts washers which attests that the customer has operated the part washer in accordance with the Permittee's operating specifications and that the customer will notify the Permittee if the operation or process generating the hazardous waste has changed. In addition, the certification shall attest that the customer has not mixed the solvent provided with other materials, or introduced into the solvent provided, any substance which contains any constituents which can be regulated as hazardous waste or which contains polychlorinated biphenyls, and that the customer has not altered the characteristics or compounds of the solvent provided.

II.E. SECURITY

II.E.1. The Permittee shall comply with security conditions and procedures found in ATTACHMENT 3.

II.E.2. Vehicles containing hazardous waste shall be secured in the facility by a locked gate if parked overnight prior to unloading.

II.F. GENERAL INSPECTION REQUIREMENTS

II.F.1 The Permittee shall comply with the inspection requirements found in ATTACHMENT 5.

II.F.2. Records of inspections shall be kept for at least three years and in accordance with R315-8-2.6(d).

II.F.3. The Permittee shall make any repairs, or take other remedial action, on a time schedule that ensures that any deterioration or malfunction discovered does not lead to an environmental or human health hazard. If the remedy requires more than 72 hours from

the time that the problem is discovered, the Permittee shall submit in writing to the Executive Secretary, before the expiration of the 72-hour period, a proposed time schedule for correcting the problem. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

II.G. PERSONNEL TRAINING

II.G.1. The Permittee shall comply with the personnel training procedures found in ATTACHMENT 4.

II.G.2. Facility personnel working with or around hazardous waste shall complete the required personnel training within six months after their hire date, assignment to the facility, or assignment to a new position at the facility.

II.G.3. Facility personnel shall take part in an annual review of their initial training in both contingency procedures and hazardous waste management procedures relevant to the positions in which they are employed.

II.G.4. The Permittee shall maintain training documents and records in accordance with R315-8-2.7(d) and R315-8-2.7(e).

II.H. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

II.H.1. The Permittee shall comply with the requirements of R315-8-2.8. and the requirements of all applicable National Fire Protection Association (NFPA) codes.

II.I. PREPAREDNESS AND PREVENTION

II.I.1. The Permittee shall follow the procedures found in ATACHMENT 3 and maintain at the facility the emergency equipment and systems identified in ATTACHMENT 3 and required by R315-8-3.3.

II.I.2. All facility communications or alarm systems, fire protection equipment, safety equipment, discharge control equipment, and decontamination equipment shall be tested as appropriate and maintained as necessary to assure its proper operation in time of emergency.

II.I.3. The Permittee shall maintain access to the communications or alarm system as required by R315-8-3.5.

II.I.4. The Permittee shall attempt to make emergency plan arrangements with State and local authorities as required by R315-8-3.7. If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee or the

arrangements change, the Permittee shall document this refusal or change in the Operating Record. The Executive Secretary shall be notified in writing within 30 days of any change to local emergency agreements.

II.J. CONTINGENCY PLAN

II.J.1. The Permittee shall immediately carry out the provisions of the Contingency plan, ATTACHMENT 2, and follow the emergency procedures described by R315-8-4.7, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten the environment or human health.

II.J.2. The Permittee shall comply with the requirements of R315-8-4.4, by providing copies of the Contingency Plan to emergency agencies who may be called in an emergency, maintaining a copy of the Plan at the facility, and by providing a copy upon request.

II.J.3. The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by R315-8-4.5.

II.K. MANIFEST SYSTEM

II.K.1. The Permittee shall comply with the manifest requirements of R315-8-5.2, R315-8-5.4, and R315-8-5.7.

II.K.2. Copies of all manifests received by the Permittee and copies of manifests where the Permittee is listed as the generator shall be submitted to the Executive Secretary by the 10^{th} day of the month following the month during which the manifests were received or generated by the Permittee.

II.L. RECORDKEEPING

II.L.1. The Permittee shall maintain a written Operating Record at the facility accordance with R315-8-5.3 and R315-50-2.

II.M. CLOSURE

II.M.1. The Permittee shall comply with R315-8-7 and close the facility in accordance with ATTACHMENT 6.

II.N. COST ESTIMATES FOR THE FACILITY CLOSURE

II.N.1. The facility's closure cost estimate shall be prepared and maintained in accordance with R315-8-8, except as provided for in Condition II.N.2. and ATTACHMMENT 6. The closure cost estimate shall also include an estimate for the reclamation of the used oil facility.

II.N.2. By May 15th of each year, the Permittee shall adjust the closure cost estimate for inflation for the previous calendar year in accordance with the procedures contained in 40 CFR 264.142(b) and submit a copy of that adjusted cost estimate to the Executive Secretary. The Permittee shall maintain the latest adjusted closure cost estimate in the Operating Record.

II.N.3. For each new hazardous waste management unit placed into operation, an updated closure/postclosure cost estimate for the facility shall be prepared which includes the new unit, prior to waste being placed on or into the new unit. Whenever the current closure cost estimate increases to an amount greater than the face amount of the closure insurance, the Permittee, within 60 days after the increase, shall either cause the face amount of the policy to be increased to an amount at least equal to the current closure cost estimate and submit evidence of such increase to the Executive Secretary or obtain other financial assurance as specified in 40 CRF 264.143.

II.N.4 The Permittee shall revise the closure cost estimate in accordance with R513-8-8 whenever there is a change in the facility's closure plan that increases the cost of closure.

II.O. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

II.O.1 The Permittee shall demonstrate continuous compliance with the requirement to establish financial assurance for closure of the facility by obtaining and maintaining closure insurance. The closure insurance shall meet the requirements established in 40 CFR 264.143(e) as incorporated by R315-8-8. Changes in the provider issuing the closure insurance and changes in the financial assurance mechanisms, shall be approved by the Executive Secretary in accordance with the permit modification procedures contained in Condition I.D.3. The current closure insurance policy, policy number PEC00095340x, is provided by Indian Harbor Insurance Company.

II.P. LIABILITY REQUIREMENTS

II.P.1. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147(a) as incorporated by R315-8-8 by obtaining and maintaining hazardous waste liability insurance for sudden accidental occurrences in the amount of at least one million U.S. dollars per occurrence with an annual aggregate of at least two million U.S. dollars, exclusive of legal defense costs. Current liability insurance is provided by Greenwich Insurance Company, policy number PEC0021020-xx.

II.P.2. The Permittee shall submit to the Executive Secretary a Certificate of Liability Insurance worded as required by R315-8-8. Each year, within 30 days prior to September 20th, the Permittee shall submit to the Executive Secretary, a new certificate of liability insurance worded as required by R315-8-8.

II.P.3. Changes in the limits of liability provided by the policy shall require the issuance of a new Certificate of Liability Insurance. This new Certificate of Liability Insurance shall be submitted to the Executive Secretary within 30 days after the effective date of the changes. Changes in liability insurance providers and liability coverage mechanisms shall be approved by the Executive Secretary in accordance with the permit modification procedures contained in Condition I.D.3.

II.Q. INCAPACITY OF OWNER OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS

II.Q.1. The Permittee shall comply with 40 CFR 264.148 as incorporated by reference into R315-8-8.

II.R. LAND DISPOSAL RESTRICTION REQUIREMENTS

II.R.1. Safety-Kleen Pioneer Road shall comply with the applicable land disposal restriction requirements in R315-13.

IV.M. SUBPART AA EMISSION STANDARDS FOR PROCESS VENTS

~~IV.M.1. The Permittee operates a solvent recycling operation consisting of a vacuum distillation system and supporting ancillary equipment. Waste solvent is fed to the system directly from the waste solvent tank or via a drum washer where containers are emptied. The distillation system includes one process vent located between the solvent water separator and the clean discharge vessel as identified on Drawing 7113-4200-301 in Attachment 7. Engineering calculations have demonstrated that emissions from the process vent are below the standards in R315-8-17 (specifically 40 CFR 264.1032(a)(1)). A copy of these calculations shall be kept on-site in the facility operating record.~~

~~IV.M.2. If the Permittee plans to make changes to the solvent recycling operation that could increase emission rates, the Permittee shall submit to the Executive Secretary, prior to implementing the changes, updated emission calculations demonstrating that operation of the system with the planned changes still meets the emission standards in R315-8-17. Should calculations show that the planned changes could cause the emission rates to exceed the standards in R315-8-17 (specifically 40 CFR 264.1032(a)(1)), the Permittee shall submit a modification request proposing how the facility will meet the emission standards in R315-8-17 under the higher emission rate operating mode. Operation of the solvent recycling system with the proposed changes that result in higher emissions shall not occur until under the necessary permit modifications have been approved that will assure compliance with R315-8-17.~~

MODULE IV

STORAGE IN TANKS

IV.A. APPLICABILITY

IV.A.1. The requirements of this module apply to the operation of the hazardous waste (spent solvent) tank system at the facility. The tank is a vertical, aboveground tank having an operating capacity of 13,986 gallons. The Permittee shall comply with R315-8-10 and all applicable requirements established in this permit when managing hazardous waste in this tank system.

IV.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

IV.B.1. The Permittee may store hazardous waste, identified by one or more of the waste codes outlined below, in the hazardous waste tank at the facility, provided the waste is not prohibited by Condition II.C.3:

IV.B.1.a. D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D021, D027, D028, D035, D039, and D040.

IV.B.2. Hazardous waste identified by waste codes other than those above shall not be placed in the hazardous waste tank system at the facility.

IV.B.3. The Permittee shall not place hazardous waste in a tank other than the hazardous waste tank identified by this permit.

IV.C. SECONDARY CONTAINMENT AND INTEGRITY ASSESSMENTS

IV.C.1. For the existing tank system, the Permittee shall keep on file at the facility, a written assessment, reviewed and certified by an independent, qualified Utah registered professional engineer that attests to the tank system's integrity. This assessment shall determine that the tank system is adequately designed and has sufficient structural strength and compatibility with the wastes being stored to ensure that it will not collapse, rupture, or fail.

IV.C.2. The Permittee shall maintain the tank system (including ancillary equipment and secondary containment) as constructed and in accordance with ATTACHMENT 8 and maintain this system in such a manner as to ensure that it performs in accordance with R315-8-10 (specifically 40 CFR 264.193).

IV.D. NEW AND REPLACEMENT TANK SYSTEMS OR COMPONENTS

IV.D.1. The Permittee shall comply with Condition I.D.3. when requesting additional, or replacement tank systems, components, or ancillary equipment.

IV.E. GENERAL OPERATING REQUIREMENTS

IV.E.1. The Permittee shall mark and maintain on the tank designated for hazardous waste storage, the words "HAZARDOUS WASTE" in lettering at least four inches in height and in a color to contrast with the tank.

IV.E.2. The Permittee shall not place hazardous wastes or other materials in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail.

IV.E.3. The Permittee shall use appropriate controls and practices to prevent spills and overflows from the tank or containment system.

IV.E.4. The Permittee shall cease operating the tank system in the event of an equipment failure, power supply failure or if the tank is found unfit for use as a result of the annual interior inspection.

IV.E.5. The Permittee shall maintain the tank system (including ancillary equipment and secondary containment) in good repair. Routine maintenance shall be performed at sufficient frequency to ensure that the tank system remains in good repair. Malfunctions and deterioration shall be corrected as expeditiously as possible.

IV.E.6. The tank system shall be designed, constructed, maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden discharge of hazardous waste or hazardous waste constituents to the air, soil, groundwater, or surface water which could threaten human health or the environment.

IV.E.7. The Permittee shall empty, visually inspect the general condition of the facility tank system, and measure the corrosion of the tank system at least once each year and certify that it can safely store the hazardous waste authorized by this permit to be managed in the tank. These inspections and tests shall be certified by an independent, qualified Utah registered professional engineer.

IV.E.8. The Permittee shall maintain the level of hazardous waste in the tank system at or below 13,986 gallons.

IV.E.9. The Permittee shall equip the tank system with and maintain a high-level alarm system in accordance with the drawings and specifications in ATTACHMENT 8.

IV.E.10. Hazardous waste or other material may be placed in the tank system only if the waste or material is compatible with the wastes already stored in the tank, and compatible with the tank or tank system construction material.

IV.E.11. Ignitable wastes placed in the tank system shall be managed in a manner that protects the waste from sources of ignition and the Permitte shall comply with all other applicable fire code requirements with respect to operation of the hazardous waste storage tank.

IV.E.12. No reactive waste shall be placed in the tank system.

IV.E.13. The tank secondary containment system shall be maintained and operated such that it remains free of both cracks and gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

IV.E.14. If the tank secondary containment area contains any material, it shall be emptied within 24 hours of discovering the contents. This means that all material, liquid, or solid, or both, will be removed. If ongoing precipitation prevents the emptying of all material from the secondary containment system, the secondary containment system shall be emptied within 24 hours of the end of the precipitation event. However, enough material shall be removed during the event to maintain sufficient containment capacity in the system. If ice from precipitation forms in the tank system secondary containment, and removal within 24 hours of discovery poses a significant risk of causing damage to the secondary containment, the Permittee may leave the ice in place until it melts without being subject to the precipitation removal requirements of this condition. Precipitation in the form of ice in the tank secondary containment shall be removed the same business day as melting occurs.

IV.E.15. The tank system secondary containment shall provide containment for at least 100% of the volume of the hazardous waste storage tank.

IV.F. RESPONSE TO LEAKS OR SPILLS

IV.F.1. In the event of a leak or a spill from the tank system, from the secondary containment system, or if either system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions:

IV.F.1.a. Immediately stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release;

IV.F.1.b. Remove waste and accumulated precipitation from the tank system and/or secondary containment system within 24 hours of detection of the leak or spill to prevent further release and allow for inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall orally notify the Executive Secretary and request additional time;

IV.F.1.c. Immediately conduct a visual inspection of the release, and based upon that inspection: prevent further migration of the leak or spill to soils or surface water and remove and properly manage any visible contamination of the soil or surface water; and

IV.F.1.d. Unless the release is one pound or less and immediately contained and cleaned up, the Permittee shall notify the Executive Secretary as soon as possible, but no later than 24 hours after detection of a release from the tank system to the environment. Within 30 days of detecting a release to the environment from the tank system, the Permittee shall

submit a written report to the Executive Secretary identifying details of the release including:

IV.F.1.d.i. Likely route of migration of the release;

IV.F.1.d.ii. Characteristics of the surrounding soil;

IV.F.1.d.iii. Results of any monitoring or sampling conducted in connection with the release;

IV.F.1.d.iv. Proximity to downgradient drinking water, surface water, and populated areas; and

IV.F.1.d.v. Description of response actions taken or planned.

IV.F.1.e. The Permittee shall close the tank system in accordance with the Closure Plan, ATTACHMENT 6, unless the following are satisfied:

IV.F.1.e.i. For a release caused by a spill that has not damaged the integrity of the tank system, the Permittee may return the tank system to service as soon as the released waste is removed and repairs, if necessary, are made;

IV.F.1.e.ii. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service;

IV.F.1.e.iii. For a release to the environment caused by a leak from a component of the tank system without secondary containment, the Permittee shall provide the component of the system from which the leak occurred with secondary containment that satisfies the requirements of R315-8-10 (specifically 40 CFR 264.193) before it can be returned to service, unless the source of the leak is an aboveground portion of the tank system that can be inspected visually. If the source of the leak is an aboveground component that can be inspected visually, the component shall be repaired and may be returned to service without secondary containment as long as the certification requirements of Condition IV.F.1.e.iv. are satisfied. If a component is replaced to comply with the requirements of this condition, that component shall satisfy the requirements for new tank systems or components in R315-8-10 (specifically 40 CFR 264.192 and 40 CFR 264.193). Additionally, if a leak has occurred in any portion of a tank system component that is not readily accessible for visual inspection, the entire component must be provided with secondary containment in accordance with R315-8-10 (specifically 40 CFR 264.193) prior to being returned to use.

IV.F.1.e.iv. If the Permittee has repaired the tank system in accordance with Condition IV.F.1.e. and the repair has been extensive, the tank system must not be returned to service unless the Permittee has obtained a certification by an independent, qualified, Utah-registered, professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. The certification shall be submitted to the Executive Secretary within seven days after returning the tank system to use.

IV.F.2. The Permittee shall comply with the requirements specified in the Contingency Plan, ATTACHMENT 2, in the event there is a release from the tank system that threatens human health or the environment.

IV.G. ORGANIC AIR EMISSION STANDARDS

IV.G.1. The hazardous waste storage tank is not subject to the requirements in Condition IV.G. if the tank meets one or more of the exemption standards found in R315-8-22 (specifically 40 CFR 264.1082(c)).

IV.G.2. If not exempt under Condition IV.G.1., the Permittee shall control air emissions from the hazardous waste tank using Tank Level 1 controls including the following:

IV.G.2.a. The Permittee may only store in the tank system, waste with an organic vapor pressure equal to or less than 5.2 kPa.

IV.G.2.b. The maximum organic vapor pressure for wastes being stored in the tank shall be determined using the procedures specified in R315-8-22 (specifically 40 CFR 264.1083(c)). The Permittee shall perform a new determination whenever changes to the hazardous waste managed in the tank could potentially cause the maximum organic vapor pressure to increase to a level equal to or greater than 5.2 kPa.

IV.G.2.c. The tank shall be equipped and maintained with a fixed roof designed to meet the following requirements:

IV.G.2.c.i. The fixed roof and its closure devices shall be an integral part of the tank and shall form a continuous barrier over the entire surface area of the hazardous waste in the tank.

IV.G.2.c.ii. The fixed roof shall be maintained such that there are no visible cracks, holes, gaps, or other open spaces between the roof section joints or between the roof edge and the tank wall.

IV.G.2.c.iii. Each opening in the fixed roof, and any manifold system associated with the fixed roof, shall be either equipped with a closure device designed to operate such that when the closure device is secured in the closed position there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the opening and the closure device; or connected by a closed-vent system that is vented to a control device. The control device shall be designed to remove or destroy organics in the vent stream, and shall be operating whenever hazardous waste is managed in the tank, except as provided below:

IV.G.2.c.iii.A. During periods when it is necessary to provide access to the tank for performing the activities of Condition IV.G.2.c.iii.B., venting of the vapor headspace underneath the fixed roof to the control device is not required, opening of closure devices is allowed, and removal of the fixed roof is allowed. Following completion of the

activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable, and resume operation of the control device.

IV.G.2.c.iii.B. During periods of routine inspection, maintenance, or other activities needed for normal operations, or for removal of accumulated sludge or other residues from the bottom of the tank.

IV.G.2.c.iv. The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the hazardous waste to the atmosphere, to the extent practical, and will maintain the integrity of the fixed roof and closure devices throughout their intended service life.

IV.G.3. Whenever hazardous waste is in the tank, the fixed roof shall be installed with each closure device secured in the closed position except as follows:

IV.G.3.a. Opening of closure devices or removal of the fixed roof is allowed at the following times:

IV.G.3.a.i. To provide access to the tank for performing routine inspection, maintenance, or other activities needed for normal operations. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable to the tank.

IV.G.3.a.ii. To remove accumulated sludge or other residues from the bottom of the tank.

IV.G.3.b. Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the tank internal pressure in accordance with the tank design specifications. The device shall be designed to operate with no detectable organic emissions when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the tank internal pressure is within the internal pressure operating range determined by the Permittee based on the tank manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, ignitable or hazardous materials.

IV.G.3.c. Opening of a safety device, as defined in R315-7-30 (specifically 40 CFR 265.1081) is allowed at any time conditions require doing so to avoid an unsafe condition.

IV.G.4. Transfer of hazardous waste to the tank or from the tank shall be conducted using continuous hard or flexible piping or another closed vent system that does not allow exposure of the hazardous waste to the atmosphere.

IV.H. ORGANIC AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

IV.H.1. The Permittee shall comply with the applicable requirements of R315-8-18 (40 CFR 264.1050 – 1065), for all equipment, including each valve, pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, or flange or other connector, and associated control devices in contact with or containing hazardous waste with an organic concentration of at least 10 percent by weight. The facility is assumed to be in heavy liquid service and the Permittee shall maintain the necessary documentation at the facility to support this assumption.

IV.I. INSPECTION SCHEDULES AND PROCEDURES

IV.I.1. The Permittee shall conduct inspections of the tank system as specified in ATTACHMENT 5.

IV.I.2. The Permittee shall submit the results of the annual tank inspection to the Executive Secretary by July 1st of each year.

IV.I.3. All tests for tanks, corrosion or foundation integrity shall be certified by an independent, Utah registered, professional engineer qualified by experience and education in the appropriate engineering field.

IV.J. SPECIAL TANK PROVISIONS FOR REACTIVE WASTES

IV.J.1. The Permittee shall not place reactive waste in the hazardous waste tank system.

IV.K. SPECIAL TANK PROVISIONS FOR INCOMPATIBLE WASTES

IV.K.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the tank system.

IV.K.2. The Permittee shall not place hazardous waste in the tank system if it has not been decontaminated and previously held an incompatible waste or material.

IV.L. CLOSURE AND POST-CLOSURE CARE

IV.L.1. At closure of the tank system, the Permittee shall follow the procedures in ATTACHMENT 6 and remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste and manage them as hazardous waste unless decontaminated to the standard established in ATTACHMENT 6.

IV.L.2. If the Permittee demonstrates that all contaminated soils cannot be practically removed or decontaminated, in accordance with the Closure Plan, the Permittee shall close the tank system as a landfill and perform post-closure care following the contingent procedures in ATTACHMENT 6.

ATTACHMENT 1

WASTE ANALYSIS PLAN

1.A. WASTE TYPES

1.A.I. The following types of hazardous waste have been identified as candidates for storage at the Facility.

1.A.I.a. **Spent Petroleum and Aqueous Parts Washer Solvent**

1.A.I.a.i. Chemically, the petroleum solvent primarily consists of petroleum hydrocarbon fractions with boiling points between 310°F and 400°F. The flash point of the petroleum solvents ranges from 105°F (ignitable) to 212°F. Impurities, such as light aromatic hydrocarbons and chlorinated hydrocarbons, usually constitute less than one percent of the total volume. The aqueous parts washer solvent is primarily an aqueous solution with a small amount of organic additives (alcohols).

Spent parts washer solvent consists primarily of parts washer solvent, solids, oil, and grease picked up in the various degreasing operations. Water content may range from 0 percent to as much as 50 percent. The oily bottoms may range from 2 percent to 10 percent by volume in the used solvent. The substances that comprise the used parts washer solvent are compatible and are suitable for bulking. The spent parts washer solvent is transported in accordance with the generator's hazardous waste determination pursuant to R315-5. Hazardous characteristics of the spent parts washer solvents can vary and are primarily associated with constituents introduced by the customer's processes. Chemically, the composition of the solvent fraction in the spent parts washer solvent is essentially the same as the clean solvent.

1.A.I.a.ii. Containers of spent petroleum based parts washer solvent that are returned from customers are poured into a drum washer/dumpster at the return/fill station, which is piped into the aboveground waste solvent storage tank located in the tank farm. ~~Alternately, the petroleum based parts washer solvent may be routed from the drum washer/dumpster directly to the on-site solvent recycling system.~~ As generated, spent petroleum based parts washer solvent may exhibit the characteristic of ignitability. Spent petroleum based parts washer solvents may also be considered characteristic waste by the toxicity characteristic leaching procedure (TCLP) and may carry the waste codes identified in Table 1-ATTACHMENT 1.

The spent aqueous parts washer solvent is transported from customers in containers and may be accumulated in the aboveground waste solvent storage tank via the return/fill station. The spent aqueous parts washer solvent may be considered characteristic waste by TCLP and may carry the waste codes referred to in Table 1-ATTACHMENT 1.

1.A.I.b. **Spent Immersion Cleaner**

1.A.I.b.i. Safety-Kleen leases units containing "immersion cleaner." This product is a petroleum-based solvent. Parts are immersed and agitated in equipment designed to minimize physical labor time. Spent immersion cleaner received by the facility from customers, is basically unchanged from its clean state, except oil, grease, and other solids may be picked up during the various degreasing operations. The spent solvent is nonflammable. It is regarded as hazardous because of the presence of various contaminants. The used immersion cleaner remains in the same container from the time it is collected from the customer until it is shipped to a Safety-Kleen recycle facility or other permitted facility. The used immersion cleaner may exhibit toxic characteristics by TCLP and may carry the waste codes referred to in Table 1-ATTACHMENT 1.

1.A.I.c. **Spent Parts Washer Solvent Tank Sludge**

1.A.I.c.i. Tank bottom sludge settles from spent parts washer solvent in the aboveground storage tank. The sludge is the residual left in the tank and may contain soils, oil and grease, and water picked up in degreasing operations, together with solvent. Analyses have shown that the sludge is an ignitable waste and may also be considered hazardous with respect to TCLP standards. The sludge is removed from the aboveground tank periodically and shipped to a Safety-Kleen facility, or other permitted facility ~~facility~~ for reclamation.

1.A.I.d. **Spent Washer Solvent Bottom Sludge**

1.A.I.d.i. Parts Washer Solvent Bottoms Sludge is either accumulated in the wet dumpster/drum washer or brought into the service center from customers in drums. Filters from parts washers utilizing parts washer solvents may also be added. The nature of this waste is similar to the used parts washer solvent tank bottom sludge, except there may be some metal parts from the cleaning operation. It is typically an ignitable waste and often is a characteristic waste using TCLP standards. The parts washer solvent bottoms sludge in the dumpsters is cleaned out frequently. The waste is containerized and stored as a Branch-generated waste in a permitted waste storage area for later shipment to a Safety-Kleen recycle facility, or other permitted disposal facility for reclamation or disposal.

1.A.I.e. **Dry Cleaning Wastes**

1.A.I.e.i. Solvents used in dry cleaning operations include ~~tetrachloroethylene (perchloroethylene), mineral spirits, 1,1,1-trichloroethane and 1,1,2-Trichloro-1,2,2-trifluoroethane~~halogenated and mineral sprit based solvents. Waste generated from dry cleaning operations may contain various concentrations of these solvents and are in the following forms:

1.A.I.e.i(A). Filter Cartridges: In addition to the filter materials of construction consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease,

and undissolved elements such as lint and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight.

1.A.I.e.i(B). Powder Residue: At some dry cleaning facilities, a mixture of powdered materials is used as the filter medium for the dry cleaning solvent, in lieu of a cartridge filter. This filter medium normally consists of diatomaceous earth and carbon. In addition to lint, soil, oil, and grease retained by this medium, between 40 and 50 percent by weight of the "powder residue" may be absorbed solvent.

1.A.I.e.i(C). Still Residue and Separator Water: After filtration at the generator, the dry cleaning solvent is distilled to remove the dissolved materials from the used solvent. The dissolved materials (still residues) are in liquid form and consist primarily of detergent, oil and grease, vinyl acetate (a sizing compound), water and 20 to 30 percent solvent. In some cases, the dry cleaner will separate the water condensate from the still residue. Water condensate removed from the processor may contain dry cleaning solvent, oil, grease and vinyl acetate.

1.A.I.e.ii. ~~Approximately 80 percent of the~~Some dry cleaning solvent in use is perchloroethylene (F002 and a characteristic waste by TCLP), and may carry the waste codes referred to in Table 1-ATTACHMENT 1. ~~Approximately 17 percent of the dry cleaning solvent is mineral spirits, and the remaining 3 percent is 1,1,1-trichloroethane or 1,1,2-Trichloro-1,2,2-trifluoroethane.~~ The mineral spirits, 1,1,1-trichloroethane and 1,1,2-Trichloro-1,2,2-trifluoroethane are non-perchloroethylene based dry cleaning wastes and are typically managed as transfer wastes.

1.A.I.f. **Paint Wastes**

1.A.I.f.i. Paint wastes consist of paints, lacquer thinners, and paint/thinner contaminated materials. The waste is collected in containers at the customer's place of business and stored in Safety-Kleen's permitted metal shelter container storage area. The paint wastes are then re-manifested and periodically sent to a Safety-Kleen recycle center, or other permitted disposal facility.

1.A.I.f.ii. Paint wastes include such constituents as acetone, isopropyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, toluene, xylenes, and acetate compounds. This waste stream may also be a characteristic waste by TCLP, and may carry the waste codes referred to in Table 1-ATTACHMENT 1.

1.A.I.g. **Imaging/Photochemical Waste**

1.A.I.g.i. Imaging waste consists typically of an aqueous solution used to etch photo film during processing. This material is characteristic by TCLP for silver (D011).

1.B. WASTE ANALYSIS PLAN

1.B.I. Safety-Kleen provides solvent distribution, collection, and reclamation services to companies that are primarily engaged in automobile repair, industrial

maintenance, dry cleaning, and imaging. When the cleaning fluids become dirty and can no longer be used effectively, Safety-Kleen picks up the dirty fluids and replaces them with clean, recycled fluids. The spent fluids are returned to the facility where they are ~~recycled onsite,~~ stored temporarily before they are ~~recycled onsite or~~ transported to one of Safety-Kleen's recycle centers or other appropriate off-site facilities. In addition to solvents used in the industrial maintenance and repair industry, Safety-Kleen also collects dry cleaning, paint-related, and photochemical/imaging wastes for temporary storage at the facility. Safety-Kleen's customers typically are small quantity generators who operate businesses that generate only a few hazardous waste streams. These factors help ensure that Safety-Kleen will receive a highly predictable and homogeneous waste stream.

1.B.II. Spent solvents are the primary feedstocks for the generation of some of the Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. Safety-Kleen controls the use and management of its solvents by:

1.B.II.a. Placing waste only in containers compatible with those wastes and segregating containers according to DOT and fire code requirements;

1.B.II.b. Determining the customer's type of business (i.e., SIC code) and the purpose for which the machine will be used;

1.B.II.c. Providing customers with information on how to use leased Safety-Kleen equipment, where applicable;

1.B.II.d. Training employees to inspect wastes and determine whether they are acceptable for storage at the branch;

1.B.II.e. Indicating on the service document, every time waste is collected, that the solvent has been evaluated and meets Safety-Kleen's acceptance criteria;

1.B.II.f. Marking each container with the customer's name, address, and EPA I.D. number (if required). This information remains on containerized waste until it is accepted at the Branch;

1.B.II.g. Keeping a record of each incoming and outgoing shipment in the operating log at the facility;

1.B.II.h. Demonstrating the chemical and physical homogeneity of the wastes by sampling and analyzing a representative portion of generator waste streams on an ongoing annual basis at the national level; and

1.B.II.i. Performing routine analysis of the wastes received at the reclamation or disposal facility.

1.B.III. The materials collected by the facility are often collected from a company with a single waste generation process. The composition and quality of these materials are known and Safety-Kleen's operating experience has shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect certain materials before returning them to the facility. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

1.B.IV. Safety-Kleen shall not accept any suspected nonconforming material until a full analysis has been done, otherwise the material shall be rejected. Procedures to verify waste characteristics shall occur at several checkpoints in the management of the waste.

1.B.V. Safety-Kleen shall require each customer to sign a service document containing the following information:

1.B.V.a. The name, address, and EPA I.D. number of the facility to which the waste is being shipped;

1.B.V.b. The customer's name, address, and EPA I.D. number (if required); and

1.B.V.c. The description and amount of waste generated.

1.B.VI. Each incoming and outgoing shipment shall be recorded in the facility's operating log. In addition, each sales representative shall review the acceptance criteria each time a waste is picked up. In accordance with Safety-Kleen procedure, all generators shall sign a statement with each shipment that indicating that no material has been added to the closed-loop products supplied by Safety-Kleen. Finally, selected environmental reviews may be utilized to guard against the addition of other wastes into the generator's waste.

1.C. QUALITATIVE WASTE ANALYSES

1.C.I. Prior to acceptance, a Safety-Kleen representative shall visually inspect each container of waste at the customer's location. This inspection shall include an evaluation of the waste volume, appearance, and consistency. Safety-Kleen personnel are familiar with the characteristics of all wastes managed at the Branch. Safety-Kleen has established specific acceptance criteria for wastes managed at their facilities based on known characteristics. These criteria, described in Condition 1.D. below, shall be used by Safety-Kleen personnel to aid in their visual inspections. These acceptance criteria enable Safety-Kleen to help ensure that the wastes being collected are acceptable and do not contain unacceptable contaminants.

1.C.II. If a particular container of waste does not meet the established acceptance criteria, the Safety-Kleen service representative shall reject the container at the customer's place of business. At the customer's request, a sample may be collected and analyzed by Safety-Kleen to determine whether the Branch can manage it.

Depending on the source, the waste shall be analyzed for parameters related to the suspected source/type of waste as identified in Table 2-ATTACHMENT 1. Alternately, the customer may choose to dispose of the material by using another (non-Safety-Kleen) facility.

1.C.III. If a waste is to be sampled for further analysis, the service representative shall take a sample of the waste and then seal the original container and label it as hazardous waste. The original container shall be left with the customer pending the results of the laboratory tests. The laboratory testing shall involve analyzing the suspect waste for compounds/characteristics related to the suspected source of the contamination (e.g., volatile organics, halogenated organics, PCBs, etc.).

1.C.IV. If the laboratory analysis reveals that the sampled waste is not contaminated and is otherwise acceptable for management at the facility, Safety-Kleen will accept the waste from the customer. If the laboratory confirms that the waste is contaminated, the customer will be given a choice as to whether they will dispose of the waste themselves or will require Safety-Kleen's assistance.

1.D. WASTE-SPECIFIC CRITERIA

1.D.I. Spent Parts Washer Solvent

1.D.I.a. Volume and color are the primary criteria for determining, by visual inspection, whether spent parts washer solvent has been contaminated. Safety-Kleen places clean parts washer solvent in various sized containers, each having a known volume based upon the service provided to the customer. When the waste is picked up, the container should not hold more than the volume originally delivered. If the volume of waste in a given container exceeds the specified level, the Safety-Kleen service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.I.b. Spent parts washer solvent shall be visually inspected for color. Clean parts washer solvent has a known color, typically a green tint or clear. Unused aqueous parts cleaner is also clear. As the solvent is used, it changes color. The specific color change is dependent upon the type of equipment being cleaned. For example, solvent used at automotive shops typically changes to brown or black, while solvent used by silk screeners will change according to the color of the inks (red, blue, pink, green, etc.). Aqueous solvent used at transmission shops changes from a clear to a red color. If the spent solvent color does not appear to be consistent with cleaning process being used, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.II. Immersion Cleaner

1.D.II.a. The criteria for the inspection of spent immersion cleaner are volume and color. Clean immersion cleaner is delivered to the customer in containers, with each container holding a known volume of immersion cleaner, typically six gallons. Spent immersion cleaner is picked up from the customer in the same containers.

If no additional material has been added to the spent immersion cleaner, the containers should contain no more the original volume of immersion cleaner. If a container contains more than the original volume, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.II.b. Clean immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. If the spent immersion cleaner does not appear to be amber, brown, or black, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.III. **Spent Dry Cleaning Filter Cartridges**

1.D.III.a. Spent filter cartridges shall be placed in containers that hold one to three cartridges. Trained service representatives visually inspect and confirm that the items in the containers are spent dry cleaning filter cartridges. The containers may also contain approximately one to two inches of liquid that should be either clear or have a light brownish tint. If the amount of the liquid is greater than approximately two inches or if the liquid is a color other than clear to light brown, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.IV. **Dry Cleaning Powder Residue**

1.D.IV.a. The criteria for the acceptance of dry cleaning powder residue are consistency and color. A container of powder residue should not contain more than one inch of liquid. The waste should be slightly wet, with the consistency of a paste. If there is too much liquid in the container, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.IV.b. The powder residue shall be inspected for a white to grayish-black color. If the residue is not white to grayish-black in color, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.V. **Dry Cleaning Still Residues**

1.D.V.a. The criteria for the acceptance of dry cleaning still residues are consistency and color. The waste should have a highly viscous, tar-like consistency. If the consistency of the waste is non-viscous/too thin, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.V.b. In addition to the consistency, the still residue waste shall be inspected for a dark brown or black color. If the waste is not dark brown or black, the service representative shall reject the container of waste in accordance with Condition 1.C.II of this attachment.

1.D.VI. **Gun Cleaner Paint Waste**

1.D.VI.a. The significant criterion for determining whether gun cleaner paint waste is accepted is volume. The solvent is provided to customers in two containers with a set volume based upon the service type. The paint gun-cleaning machine operates as a closed system consisting of container of fresh lacquer thinner and a container for spent lacquer thinner. The closed system is designed such that there should never be a combined volume of more than the set volume of lacquer thinner in the two containers. At the time of customer waste pickup, if there is more waste in the two containers than the original volume of lacquer thinner provided to the customer, the service representative shall reject the waste in accordance with Condition 1.C.II of this attachment.

1.D.VII. **Paint Waste**

1.D.VII.a. The criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative shall insert a three-foot-long glass tube into the container. The tube should glide easily down to the bottom of the container. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative shall reject the waste. The contents of the glass tube shall also be visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the three-foot tube (the water and paint will separate in the tube and thus can be measured), the waste shall be rejected in accordance with Condition 1.C.II of this attachment.

1.D.VIII. **Imaging Waste**

1.D.VIII.a. When a customer is initially signed up for Safety-Kleen's imaging service, their waste is analyzed for silver content using a Colorimeter or other device to measure silver content. A visual examination is made of the photo solution each time the waste is picked up. The imaging waste typically has a light to dark amber color and an aqueous consistency. At the time of pickup, if the safety-Kleen representative observes that the waste is not a light to dark amber in color and aqueous in consistency, the waste shall be rejected in accordance with Condition 1.C.II of this attachment.

1.E. WASTE ANALYSES AT THE RECYCLE FACILITY

1.E.I. Wastes shipped from the facility to a Safety-Kleen recycle facility are sampled and analyzed upon receipt in accordance with the waste analysis plan for the recycle facility. Analyses performed at the Safety-Kleen recycle facilities are undertaken to safeguard the recycling process and to assure product quality. Samples of bulk loads and composites of drum loads are analyzed for waste specific parameters including flash point, TCLP (except herbicides and

pesticides), and volatile organics. Results of analyses performed at the Safety-Kleen recycle center or other laboratory of waste shipments from the facility shall be obtained by Permittee within 30 days of receipt of the waste at the recycle center and shall be maintained in the facility operating record.

1.F. WASTE PROFILING

1.F.I. The Permittee shall establish a profile for each waste stream prior to initial acceptance of the waste stream from a generator. The waste profile includes the information necessary to properly manage the waste stream and establishes a baseline of information for use in determining acceptability of subsequent shipments of the waste stream.

1.F.II. The Permittee shall use analytical testing, generator waste characterization information, and process knowledge to establish each waste profile. At a minimum, the Permittee shall conduct the analyses or obtain analytical results for the tests identified in Table 2-ATTACHMENT 1 to establish each waste profile. The information used to establish each waste profile shall be maintained in the facility operating record.

1.F.III. At the time of waste pickup, each generator shall certify in writing that the waste being collected matches the established profile.

1.G. REQUIRED RECORDS AND REPORTING

1.G.I. Waste Manifests

1.G.I.a. Appropriate shipping papers/manifests are used, based on the monthly quantity of hazardous waste generated by the customer. Safety-Kleen services all three categories of generators in Utah — conditionally exempt small quantity generators (CESQGs), small quantity generators (SQGs), and large quantity generators (LQGs). CESQGs' spent solvent is removed via a service document and no manifest or Land Disposal Restrictions (LDR) form/notification is required. Appropriate records are kept at the Branch as to the date of waste pick-up, quantity, and other data on the service document. SQGs' spent solvent may be shipped under a tolling agreement, i.e., a contractual agreement between the SQG and a recycler where the recycler reclaims the waste and returns regenerated product to the SQG, in which case a manifest is not required provided the requirements of R315-5-2.20(e) are met. An LDR form/notification shall be completed per the requirements of R315-13-1 for each SQG. LQGs' spent solvent shall be manifested (if hazardous) and an LDR form/notification completed per the requirements of R315-13-1.

1.G.I.b. Spent solvent (from each Safety-Kleen customer, regardless of generator status) shall be brought back to the Branch and dumped in the return/fill station ~~and either~~ pumped to the waste solvent tank ~~or directed to the onsite recycling system~~. The waste solvent tank contains the spent solvent of many customers and is hazardous waste. The contents are ~~either recycled onsite or~~ regularly sent via

truck tanker to a Safety-Kleen recycle center, or other permitted facility. These loads shall be manifested. An LDR form/notification shall be completed per the requirements of R315-13-1.

1.G.I.c. Shipments of parts washer solvent bottoms sludge shall also be manifested as indicated above. Required records shall be kept at the Branch and the recycle center for five years.

1.H. LAND DISPOSAL RESTRICTION REQUIREMENTS

1.H.I. Safety-Kleen Pioneer Road shall comply with the applicable land disposal restriction requirements in R315-13. Incoming loads lacking the proper LDR notification shall not be accepted. Outbound shipments shall include the proper LDR notification.

TABLE 1-ATTACHMENT 1

PERMITTED WASTES
SAFETY-KLEEN SYSTEMS, INC.
SALT LAKE CITY, UTAH

Waste Type	Process Code(s)	Estimated Annual Amounts (thousands of gallons)	Potential Waste Codes
Spent Parts Washer Solvent[1,2]	S01 S02	336 336	D001 and D-Codes Listed in Note Below
Spent Aqueous Parts Washer Solvent[1,2]	S01 S02	Included Above	D-Codes Listed in Note Below
Spent Parts Washer Bottom Sludge[1]	S01	Included Above	D001 and D-Codes Listed in Note Below
Spent Parts Washer Bottom Sludge from Tank[2]	S02	Included Above	D001 and D-Codes Listed in Note Below
Spent Immersion Cleaner[1]	S01	14	D-Codes Listed in Note Below
Dry Cleaning Waste[1]	S01	97	D001, F002 and D-Codes Listed in Note Below
Paint Waste[1]	S01	19	D001, F003, F005 and D-Codes Listed in Note Below
Imaging/Photochemical Waste[1]	S01	20	D011

NOTES:

D-Codes: **Container Storage -** D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D038, D039, D040, D041, D042, and D043
Tank Storage - D004, D005, D006, D007, D008, D009, D010, D011, D018, D021, D027, D028, D035, D039, and D040

[1] This waste may be stored in containers at the facility.

[2] This waste may be stored in the hazardous waste storage tank at the facility.

TABLE 2-ATTACHMENT 1
Waste Specific Analytical Requirements
Safety-Kleen Systems, Inc.
Salt Lake City Service Center[1]

Waste Stream	Tests	Methods (SW-846)[2]
1. Spent Parts Washer Solvent Sample collected from tank or container[3]	Flash Point TCLP (organics and inorganics[4]) Appearance and Specific Gravity[5]	1010 1311
2. Spent Parts Washer Tank Bottom Sample collected from tank	Flash Point TCLP (organics and inorganics) Appearance	1010 1311
3. Spent Parts Washer Dumpster Sludge Random Grab Sample	Flash Point TCLP (organics and inorganics) Appearance	1010 1311
4. Spent Immersion Cleaner Random Grab Sample	Flash Point TCLP (organics and inorganics) Appearance and Specific Gravity	1010 1311
5. Dry Cleaning (Filter Cartridges, Powder Residue, and Still Bottoms)	Flash Point TCLP (organics and inorganics) Appearance Volatile Organics (F-Wastes)	1010 1311 8260
6. Paint Waste Random Grab Sample	Flash Point TCLP (organics and inorganics) Appearance Volatile Organics (F-Wastes)	1010 1311 8260
7. Paint Spray Gun Cleaner Random Grab Sample	Flash Point TCLP (organics and inorganics) Appearance Volatile Organics (F-Wastes)	1010 1311 8260
8. Imaging/Photochemicals Random Grab Sample	TCLP (organics and inorganics) Appearance	1311

Notes:

1 - All certifiable tests conducted by Utah Certified Laboratory
2 - Method Detection Limits must comply with SW-846 standards
3 - Sampling criteria applicable to Service Center quantitative analysis
4 - TCLP organics = volatile and semi-volatile constituents
5 - Appearance and Specific Gravity may also be performed by qualified Safety-Kleen Service Center representatives

ATTACHMENT 4

PERSONNEL TRAINING

4.A. OUTLINE OF TRAINING PROGRAM

4.A.I. Safety-Kleen shall provide training to all employees within the first six months of the employee's hire date with an annual review thereafter. Each employee involved in hazardous waste management shall be trained to operate and maintain the facility safely, and to understand hazards unique to his/her job assignment. The training given to each employee shall be reflective of his or her job duties and other responsibilities at the facility, and may include classroom, on-the-job and independent study modules.

4.B. DESCRIPTION OF THE TRAINING PROGRAM

4.B.I. ~~The Branch Manager conducts the required personnel training or may designate a qualified alternate~~Personnel training is provided through multiple sources; Examples include, Branch Manager, online learning, H&S and Environmental Managers, Safety-Kleen Training Department. ~~Training for the Branch Manager comes from both Safety-Kleen Environmental Health & Safety and regional environmental engineers. The training is sufficient to allow the Branch Manager to then train facility employees.~~ Records of required personnel training shall be maintained at the facility and/or electronically. An example outline of the introductory and continuing training for facility employees is contained in Table 1-ATTACHMENT 4. An example outline of the training for Branch Managers is included in Table 2-ATTACHMENT 4. Appendix A-ATTACHMENT 4 identifies ~~the~~ example job titles and associated job descriptions found at the facility.

4.C. INTRODUCTORY TRAINING

4.C.I. Introductory training shall be provided for all employees at the facility. The training shall include, as applicable, the topics described in R315-8-2.7(a)(3), and the following topics relevant to each employee's duties or responsibilities at the facility, and any specific training for their job position as described in Condition 4.F. of this attachment.

4.C.I.a. The Waste Analysis Plan, ATTACHMENT 1.

4.C.I.b. The Contingency Plan, ATTACHMENT 2.

4.C.II. Introductory training shall be completed within six months after the date of employment or assignment to the facility, or starting a new position at the facility.

Employees shall not work in an unsupervised position related to hazardous waste management until the introductory training requirements described in this section have been completed.

4.D. CONTINUING TRAINING

4.D.I. Employees at the facility shall receive refresher training annually to review the topics described in Condition 4.C. of this Attachment. ~~Annual refresher training shall be taken in the same calendar quarter of the years following completion of the initial training, i.e., if the initial training was completed January 15th, then the refresher training shall be completed by the end of the first quarter in the next and subsequent calendar years.~~ The annual training shall also include updates on environmental regulations, an in-depth review of the Contingency Plan, and a review of RCRA inspection criteria.

4.E. TRAINING PROGRAM MANAGER QUALIFICATIONS

4.E.I. The training program shall be directed by an individual trained in hazardous waste management procedures. Qualified personnel shall provide training for employees. The following describes the specific qualifications for the training program manager and on-the-job instructors.

4.E.I.a. Training Program Manager

4.E.I.a.i. The Branch Manager or designee shall be responsible for managing the training program at the facility. The Branch Manager or designee shall possess experience or education in hazardous waste management, as well as the experience and qualifications necessary to train employees on the facility-specific operational issues.

4.E.I.b. On-the-Job Instructors

4.E.I.b.i. The Branch Manager or designee shall perform on-the-job training for employees. In either case, the instructor shall be skilled in the current methods of facility operation and duties of the job.

4.F. TRAINING APPLICABLE TO JOB TASKS

4.F.I. The training program is designed to familiarize employees with the emergency procedures and equipment, environmental regulations, and record keeping procedures relevant to the jobs they perform. The program shall ensure that all facility personnel will be able to respond appropriately to an emergency at the facility. Job duties and specific training applicable to each job title at the facility are described below.

4.F.I.a. BRANCH MANAGER

4.F.I.a.i. The ~~branch~~ Branch ~~manager~~ Manager at the facility shall be responsible for the compliance, operation, and maintenance of the facility along with directing sales activities. This position shall be responsible for assuring that the facility operates within the requirements of the permit and applicable regulations and shall be responsible for acting as the emergency coordinator during implementation of the contingency plan. He/she conducts required personnel training or may designate a qualified alternate. The Branch Manager will possess the training described in Table 2-ATTACHMENT 4.

4.F.I.b. SALES AND SERVICE STAFF

4.F.I.b.i. Safety-Kleen sales and service personnel pick-up wastes from Safety-Kleen customers (as well as sales related duties) and are responsible for assuring that waste is picked up in compliance with the Waste Analysis Plan, ATTACHMENT 1 of this Permit. Sales and service personnel who are involved with sampling and analysis activities required under the Waste Analysis Plan shall be properly trained in performance of these duties. Specific training for sales and service personnel shall include at a minimum:

4.F.I.b.i(A). Applicable occupational health and safety requirements for workers at hazardous waste treatment, storage, and disposal facilities, including use of personal protective equipment;

4.F.I.b.i(B). Sampling protocol;

4.F.I.b.i(C). Methods for performing required testing (where applicable for on-site personnel); and

4.F.I.b.i(D). Record keeping requirements for activities required under this permit.

4.F.I.b.ii. Sales and service personnel shall also be trained in manifests, facility inspection records, and training records. Sales or service personnel may also be trained to conduct the facility inspections or act as an emergency coordinator during implementation of the Contingency Plan.

4.F.I.c. WAREHOUSE EMPLOYEES

4.F.I.c.i. The facility warehouse employees (e.g., Lead Material Handler/Material Handlers) are responsible for loading and unloading waste off the trucks, bulking waste when applicable, and maintaining the container storage areas (as well as the other facility maintenance duties) in accordance with the permit and applicable regulations.

4.F.I.c.ii. Warehouse employees shall be trained to maintain the service center and assist the other branch employees in their tasks. A warehouse employee may also be trained to conduct the facility inspections or act as an emergency coordinator during implementation of the Contingency Plan. Specific training for the warehouse employees shall include at a minimum:

4.F.I.c.ii(A). Applicable occupational health and safety requirements for workers at hazardous waste treatment, storage, and disposal facilities, including use of personal protective equipment;

4.F.I.c.ii(B). Methods for performing required testing or acceptance of wastes as described in the Waste Analysis Plan, ATTACHMENT 1; and

4.F.I.c.ii(C). Record keeping requirements for activities required under this permit.

4.F.I.d. ADMINISTRATIVE EMPLOYEES

4.F.I.d.i. The facility's administrative staff, (e.g., Senior Branch Administrator/Branch Administrator~~Lead Administrative Assistant/Branch Secretaries~~) are responsible for providing support to the Branch Manager and the ~~sales~~ Sales and ~~service~~ Service ~~representatives~~ Representatives in their daily tasks. Administrative employees are also responsible for maintaining the facility files and other office duties as required. Administrative employees shall be trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they shall check it for accuracy and completeness and then process or file it as required. Additional training shall be overseen by the Branch Manager and shall be completed within six months of hiring.

4.G. TRAINING RECORDS

4.G.I. Training for facility personnel shall be documented in the facility operating record via hardcopy or electronic files. Training records on current personnel shall be kept until closure of the facility; training records on former employees shall be kept for at least three years from the date the employee last worked at the facility. An up-to-date ~~written~~ organization chart identifying all facility employees and their current job titles shall be maintained~~. on-site at the facility~~.

TABLE 1-ATTACHMENT 4

EXAMPLE INTRODUCTORY AND ANNUAL TRAINING TOPICS FOR FACILITY EMPLOYEES

A. ~~Hazard Communication-Safety Training~~Environmental Regulation Update

B. ~~Hazard Communication-Understanding the MSDS~~Part A and Part B Permit Requirements

C. Waste Analysis Plan-

Includes a review of the Part B permit; Sampling and analysis procedures ~~including specific gravity~~ (except for ~~branch~~ Branch ~~secretaries~~Administrators); and record keeping.

D. Preparedness and Prevention and Contingency Plan-

~~This includes emergency procedures contained in the Part B permit, including:~~

~~1. Procedures for use, inspection, repair and replacement of facility emergency response equipment shall be reviewed.~~

~~2. Communications and alarm systems.~~

~~3. Response to fires and explosions.~~

~~4. Response to groundwater contamination incidents.~~

~~5. Shutdown procedures for facility operations.~~

E. Contingency Plan and Emergency Procedures

~~E~~F. ~~Preventing Injuries and Illness~~Annual Review of Training

~~F. Hazards Associated with Handling Hazardous Materials-~~

~~Respirator Fit Test for those employees requiring respirator use~~

G. ~~Chemistry of Safety-Kleen Products~~Facility Inspections

H. ~~Hazardous Materials Regulations~~Manifesting Requirements

I. ~~Manifesting~~Spill Reporting (Includes a Review of SPCC Plan

J. ~~Spill Simulations and Spill Reports~~Waste Minimization

K. Storm Water Pollution Prevention Plan

TABLE 2-ATTACHMENT 4
EXAMPLE TRAINING PLAN OUTLINE - BRANCH MANAGER

Branch Manager Training:

Classroom training for the Branch Manager includes the following:

A review of the Part B permit and Utah Hazardous Waste Regulations including:

Part A Application

Waste Analysis Plan (includes training in ~~in specific gravity~~ sampling and analytical methods)

Preparedness and Prevention Plan

Inspection Plan, including identification of malfunctions, deteriorations, or other problems at the site

Closure Plan and Financial Assurance Requirements

Training Plan
- Reviewing of warehouse and secretary responsibilities
- Orientation and training of branch personnel

Contingency Plan training, including:
- Spill simulation, response, and spill reporting
- Fire and explosion procedures
- Shutdown of operations
- Local emergency information
- Local authority information
- Emergency equipment, including
  - Use
  - Inspection
  - Repair
  - Replacement

Operating Procedures, including
- Tank and Container Management procedures
- Solvent scheduling
- Inventorying

Health and Safety, including
- OSHA training and reporting

Manifesting procedures and Land Ban Notifications, including

~~Tranship labeling~~
Transportation licensing

APPENDIX A – ATTACHMENT 4

EXAMPLE JOB TITLES AND JOB DESCRIPTIONS

Example List of Salt Lake City, Utah Service Center Employee Positions

Branch General Manager

~~**Branch Secretary**~~**Branch Administrator**

~~**Lead Administrative Assistant**~~**Senior Branch Administrator**

Customer Service Manager~~gr~~

Market Sales Specialist~~ – Hunter~~

~~**Major Account Specialist**~~

~~**Customer Service Technician**~~

~~**Customer Service Rep**~~**Sales and Service Representative**

~~**Sr Customer Service Rep**~~

~~**Customer Service Representative – Vac**~~**Oil Sales and Service Representative**

~~**Customer Service Representative, Oil**~~**Vac Sales and Service Representative**

Lead Material Handler

Material Handler

Safety-Kleen Systems, Inc.

Job Description

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

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

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

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

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

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

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

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

Safety-Kleen Systems, Inc.

Job Description

Job Title: **Branch General Manager**
Department: Branch Sales & Service
Reports To: District Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 01/29/07

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

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

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

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

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

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

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

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

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

Safety-Kleen Systems, Inc.

Job Description

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

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

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

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

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

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

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

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

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

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

Safety-Kleen Systems, Inc.

Job Description

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

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

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

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

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

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

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

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

Safety-Kleen Systems, Inc.

Job Description

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

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

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

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

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

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

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

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

Safety-Kleen Systems, Inc.

Job Description

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

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

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

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

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

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

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

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

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

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

Safety-Kleen Systems, Inc.

Job Description

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

Summary: The VSSR provides waste fluid removal services to our customers. This involves using vacuum equipment to pump waste materials and liquid from oil-water separator pits, as well as transporting & delivering the waste material to Safety-Kleen disposal sites.

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

- Receive manifests, labels & route schedule from office staff
- Perform Pre & Post Trip Inspection Report
- Perform routine route and associated daily activities.
- Properly label, scan and document waste materials & liquids removed from customer site.
- Present receipt to customer, obtain authorized signature, as well as answer any customer service issues.
- Complete end of day paperwork.
- Ensure environmental compliance and operate vehicles in accordance with DOT, local, state and federal requirements.
- Ensure strict compliance to Branch SOP's.

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

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

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

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

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

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

ATTACHMENT 5

INSPECTIONS

5.A. INSPECTION PROCEDURES

5.A.I. The inspections outlined in this Attachment are the minimum required. All inspections required by this permit shall be documented ~~on forms~~ and maintained as part of the facility operating record in electronic or hardcopy format. ~~Copies of the~~Example inspection forms are found in Appendix A-ATTACHMENT 5.

5.A.II. The Branch Manager or designee (the inspector) shall be responsible for carrying out and documenting the facility inspections each business day. The inspector shall note any identified ruptures, spills, or repairs that are needed and note remedy actions. If the inspector cannot carry out the repairs, the inspector shall work with an engineering project manager at Safety-Kleen's corporate headquarters to complete the repairs. Completion of repairs shall be noted on the Facility inspection record.

5.A.III. Facility inspections shall include the following:

5.A.III.a. Tank inspections -- Tanks holding the clean solvent and the tank holding the spent solvent shall be inspected at least once each business day. The inspections shall include checks of the high level alarm and of the volume of solvent held in the tank. Sudden deviations in the solvent volumes shall be immediately investigated and the cause determined. If necessary, repairs shall be initiated immediately. Pick-ups of spent solvent shall be scheduled on a regular basis. The spent solvent quantity shall not exceed the permitted tank volume at any time. The tanks are equipped with high-level audiovisual alarms and manual shut-off valves.

5.A.III.b. The secondary containment for the tanks shall be inspected each business day for cracks or other deterioration. Any damage to the tanks (such as rust or loose fixtures) or the secondary containment shall be noted and repairs initiated.

5.A.III.c. Air emission inspections shall be conducted on the waste tank and ancillary equipment and the solvent recycling system in accordance with Condition 5.B. of this attachment.

5.A.III.d. Air emission inspections shall be conducted on the containers and tank system in accordance with Condition 5.C. of this attachment.

5.A.III.e. Solvent dispensing equipment -- The solvent dispensing hose, connections and valves shall be inspected for damage (such as cracks or leaks) and proper functioning. Any solvent left in the hoses shall be drained after use. The pumps, pipes and fittings shall be checked for damage and proper functioning. Any damage to the solvent dispensing equipment shall be noted and repaired.

5.A.III.f. Container storage areas -- Container storage areas shall be inspected for the number and condition of the drums stored. The total volume of the materials held in the container storage areas shall not exceed 4,500 gallons for the warehouse container storage area and 3,300 gallons for the metal shelter container storage area. Any leaking or suspect drum shall be placed in a salvage drum of adequate integrity. Drums shall be inspected to determine if they are properly labeled and marked in accordance with U.S. DOT and R315 of the rules. The secondary containment system, condition of the pad and sumps shall be inspected for deterioration or failure. If cracks or leaks are detected, they shall be repaired immediately.

5.A.III.g. Route vehicles -- Each route vehicle shall be inspected to ensure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment shall be inspected to determine if: sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses are in the vehicle. Any missing equipment shall be replaced.

5.A.III.h. Dumpster/drum washers -- The dumpsters/drum washers at the return and fill station shall be inspected for leaks and sediment build-up. Any leaks shall be noted and repaired immediately and excess sediment shall be removed from the dumpster.

5.A.III.i. Safety equipment -- The fire extinguishers shall be checked weekly to ensure that the units are charged and accessible, and shall be inspected annually. The fire suppression system shall be checked weekly to ensure that the unit is charged and shall be inspected annually. In addition, proper operation of the eyewash shall be confirmed and the first aid kit and sorbents shall be inspected for adequate content and accessibility. The identity and location of the emergency equipment required at the facility is included in ATTACHMENT 3, Preparedness and Prevention.

5.A.III.j. Security -- The operation of each gate and lock shall be inspected. In addition, the fence and danger signs shall be inspected for deterioration on a weekly basis.

5.B. SUBPART BB INSPECTION PROCEDURES FOR TANK/DRUM WASHER SYSTEM/SOLVENT RECYCLE SYSTEM

5.B.I. These inspection procedures identify leaks from pumps, valves, flanges and other equipment associated with the return and fill station/drum washer, tank system and solvent recycle system and demonstrate compliance with the inspection requirements of R315-8-18. The organic liquid in these systems meets the definition of "in heavy liquid service" as defined in R315-8-18.

5.B.II. Pumps/Valves/Flanges/Other Equipment

5.B.II.a.i. Each pump, valve, flange and other equipment as defined in R315-8-18 (specifically 40 CFR 264.1051) shall be marked with a unique ID as indicated on

Drawings 7113-4200-301, Rev C and 7113-5600-350, Rev D in ATTACHMENT 7. Non-flanged fittings associated with the solvent still that are not required to be tagged, but are otherwise subject to Subpart BB, shall be painted brown. All piping under the return and fill dock is subject to Subpart BB except for the product piping that is painted green and orange.

5.B.II.a.ii. Each pump, valve, flange, and other equipment as defined in R315-8-18 that also meets the definition of being "in vacuum service" shall be marked with a unique ID as indicated on Drawing 7113-4200-301, Rev C. After labeling, these are exempt from additional regulation under R315-8-18 (specifically 40 CFR 264.1050(e)).

5.B.II.b. Each pump, valve, flange and other equipment regulated by Subpart BB shall be inspected each operational day for any evidence of leakage, which is indicated by any visual sign of liquids leaking/dripping from the equipment.

5.B.II.c. Evidence of leakage and means determined shall be noted on the inspection log.

5.B.II.d. When a leak is detected, it shall be repaired as soon as practical, but not later than 15 calendar days after being detected, except as provided in 40 CFR 264.1059.

5.B.II.e. Should a leak be detected, a first attempt at repair (e.g., tightening the packing gland) shall be made no later than five calendar days after the leak is detected.

5.B.II.f. Equipment discovered to be leaking shall be identified with a weatherproof tag containing the following information:

5.B.II.f.i. Equipment I.D number; and

5.B.II.f.ii. Date leak found.

5.B.II.g. A tag indicating a leak may be removed after effective repairs are made.

5.B.III. Results of Subpart BB inspections shall be recorded in the facility operating record in electronic or hardcopy format. Example inspection forms are found in Appendix A – ATTACMENT 5. ~~on the Inspection Log Sheet for daily inspection of Tank/Solvent Still Equipment.~~

5.B.IV. Corrective action for each Subpart BB leak shall be recorded in the facility operating record in electronic or hardcopy format. Exemple inspection forms are found in Appendix A – ATTACHMENT 5. ~~on the Inspection Log Sheet for daily inspection of Tank/Solvent Still Equipment.~~

5.C. SUBPART CC INSPECTION PROCEDURES FOR CONTAINERS AND TANK SYSTEM

5.C.I. The Permittee shall inspect containers subject to Level 1 controls and their covers and closure devices as follows:

5.C.I.a. In the case when a hazardous waste is already in the container at the time the Permittee first accepts possession of the container at the facility and the container is not emptied within 24 hours after the container is accepted at the facility, the Permittee shall visually inspect the container and its cover and closure devices to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall make first attempts at repair no later than 24 hours after detection and the repair shall be completed as soon as possible, but not later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

5.C.I.b. In the case when a container used for managing hazardous waste remains at the facility for a period of 1 year or more, the Permittee shall visually inspect the container and its cover and closure devices initially and thereafter, at least every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the Permittee shall make first attempts at repair no later than 24 hours after detection and the repair shall be completed as soon as possible, but not later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

5.C.II. The Permittee shall inspect containers subject to Level 2 controls and their covers and closure devices in accordance with R315-8-22 (specifically 40 CFR 264.1086(d)(4)).

5.C.III. The Permittee shall inspect the tank system air emission control equipment in accordance with the following requirements:

5.C.III.a. The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices.

5.C.III.b. The Permittee shall perform an inspection of the fixed roof and its closure devices at least once every year except as allowed below:

5.C.III.b.i. Following the initial inspection of the cover, subsequent inspection may be performed at intervals longer than one year under the following conditions:

5.C.III.b.i(A). In the case when inspecting the cover would expose a worker to dangerous, hazardous, or other unsafe conditions then the Permittee may designate a cover as an "unsafe to inspect cover" and comply with the following requirements:

5.C.III.b.i(A)1. Prepare a written explanation for the cover stating the reasons why the cover is unsafe to visually inspect, if required.

5.C.III.b.i(A)2. Develop and implement a written plan and schedule to inspect the cover as frequently as practicable during those times when a worker can safely access the cover.

5.C.III.c. In the event a defect in the fixed roof or its closure devices is detected, the Permittee shall repair the defect in accordance with the following schedule: The Permittee shall make first efforts at repair of the defect no later than five calendar days after detection, and the repair shall be completed as soon as possible but no later than 45 calendar days after detection unless the Permittee determines that repair of the defect requires emptying or temporary removal from service of the tank and no alternative tank capacity is available at the site to accept the hazardous waste normally managed in the tank. In this case, the Permittee shall repair the defect at the earliest available time when transfer of waste to the tank could be suspended and the tank emptied or removed from service. Repair of the defect shall be completed before the transfer of waste to the tank resumes.

APPENDIX A – ATTACHMENT 5

EXAMPLE INSPECTION FORMS

Insert - Inspection Log Sheet for daily inspection of Storage Tank/Solvent Recycle Systems (4 pages)
- Inspection Log Sheet for daily inspection of Container Storage Area (1 page)
- Inspection Log Sheet for weekly inspection of Safety and Emergency Equipment, Security Devices and Miscellaneous Equipment (1 page)