## APPENDIX A PART A APPLICATION

## United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM



1.	Reas	on fo	r Sub	mitta	ıl (Sel	ect o	nly or	ie.)												
				Obtain or a p	_		_	an E	PA IC	) num	nbe	er for	on-go	oing	regulate	d activit	ies (Items 10-17	below) tha	at wi	II continue
			!	Subm	itting	as a	comp	onen	t of t	he Ha	aza	rdous	Wast	te R	eport fo	r	(Reporting	g Year)		
					w	aste,	> 1 kg	g of a	cute	hazar	do	us wa	ste, o	or >	100 kg of	acute l	r of ≥ 1,000 kg of nazardous waste regulations)			
				Votify	ing th	nat re	gulat	ed ac	tivity	is no	lo	nger	occur	ring	at this Si	te				
				Obtair	ning c	or upo	lating	an E	PA IC	) num	nbe	er for	condu	uctir	ng Electro	nic Ma	nifest Broker acti	ivities		
		√	9	Submi	itting	a nev	v or r	evise	d Par	t A (p	er	mit) F	orm							
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۷.	Site								_		Γ.									
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3.	Site i	Name																		
		Safe	ety-K	leen	Sys	tems	, Inc	•												
4.	Site I	.ocati	on A	ddres	s															
		Stree	et Ado	dress		1	6319	) Eas	st Ma	arsha	ail	Stree	et							
	i	City,	Town	ı, or \	/illage	e 1	Tulsa	ļ.			-		• • • •				County Ro	gers		
		State	:	Ol	daho	oma				Coun	itry	/ U	SA				Zip Code 741	116		
		Latit	ude	36.	1729	962				Longi	itu	de -	95.7	951	151		Use Lat/Lon	ng as Prima	ry A	ddress
5.	Site I	Mailin	g Ad	dress													<b>√</b> Same a	as Location	Stre	et Address
		Stree	t Ado	lress																
		City,	Town	, or V	/illage	:														
		State								Count	try						Zip Code			
6.	Site L	and T	уре																	
		√Pr	ivate		Cc	ounty		D	istric	t		Fed	eral		Triba		Municipal	State		Other
7.	Norti	n Ame	ericar	ıIndu	ıstry (	Classi	ficati	on Sy	sten	ı (NA	ICS	S) Cod	e(s) f	or t	he Site (a	it least	5-digit codes)			
		A. (F	Prima	ry)		562	112							C	•	484	1230			
		В.				484	220							D	4	532	2490			

) Number																		es	
e Contact I	nforma	ition													<b>√</b>	Same	as L	oca	tion Ad
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Title			Bra	anch	Gen	eral	Man	ager	r										
Street A	ddress		163	319 E	ast N	<b>Var</b>	shall	Stre	et										
City, To	vn, or	/illage	Tul	Isa															
State	ОК						Coun	itry	USA				Zip Co	ode 7	411	16			
Email	boz.c	annon(	@safe	ety-k	leen.	con	n												
Phone	918-2	34-518	5				Ext	i	N/A				Fax						
A. Name	of Site												Dat	e Beca	me				ion Add
Safety	-Klee	n Syste	ms, lı	nc.										/1978			• /		
Owner T													,			_		-	<b>-</b>
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	ddress		42		jwate			Feder	ral		Tribal	L	Munic	cipal		Sta	te		Othe
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Street A City, Tov State Email	Mass N/A 781-7	/illage achuse	42 Nor	Long	jwate		Coun		USA	A	Tribal		Zip Co	ode ()		61-914	19	oca	Othe
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Street Ad City, Tow State Email Phone Commer B. Name Full Name Safety Operator Private Street Ad City, Tow	Mass N/A 781-7 Its  of Site e -Kleer Type	/illage achuse 92-5000 's Legal Count	42 Nor	Long rwell ator	jwate	r Di	Coun	eder	N/A	A .			Zip Co Fax Dat 1/1	e Beca /1978	I/A	Same Opera	as Lottor (		tion Add

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

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

### A. Hazardous Waste Activities

V		1. Gen	Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c						
		<b>V</b>	a. LQG	-Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.					
			b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.					
			c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.					
	Ζν	process	ses). If "Ye:	nerator (generates from a short-term or one-time event and not from on-going s", provide an explanation in the Comments section. Note: If "Yes", you MUST indicate perator of Hazardous Waste in Item 10.A.1 above.					
V	□ <sub>V</sub>	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.							
V	D'	4. Rece	. Receives Hazardous Waste from Off-site						
Y	Δh	5 Recyc	Recycler of Hazardous Waste						
			a. Recycler who stores prior to recycling						
			b. Recycler who does not store prior to recycling  Figure 20. If "Voc" mark all that apply						
Y	Δh	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.							
	a. Small Quantity On-site Burner Exemption								
	b. Smelting, Melting, and Refining Furnace Exemption								

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

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

F003 F005

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

N/A			

A. Other was	te Act	ivities
√Y N	1. Tra	nsporter of Hazardous Waste—If "Yes", mark all that apply.
		a. Transporter
	<b>V</b>	b. Transfer Facility (at your site)
Y V	2. Ur	nderground Injection Control
Y VN	3. Ur	ited States Importer of Hazardous Waste
Y V N	4. Re	cognized Trader—If "Yes", mark all that apply.
		a. Importer
		b. Exporter
A N	5. Im that a	porter/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If "Yes", mark a apply.
		a. Importer
		b. Exporter
B. Universal W	. Larg	Activities  e Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If "Yes" mark all that Note: Refer to your State regulations to determine what is regulated.
		a. Batteries
	$\sqcap$	b. Pesticides
	H,	c. Mercury containing equipment
		d. Lamps
		e. Aerosol Cans
		f. Other (specify)
		g. Other (specify)
Y / N 2	. De	stination Facility for Universal Waste Note: A hazardous waste permit may be required for this
C. Used Oil Act	tivities	
<b>√</b> Y	Used	l Oil Transporter—If "Yes", mark all that apply.
		a. Transporter
	<b>V</b>	b. Transfer Facility (at your site)
Y / N 2	. Used	Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
		a. Processor
		b. Re-refiner
Y V N 3	. Off-S	pecification Used Oil Burner
	. Used	Oil Fuel Marketer—If "Yes", mark all that apply.
		a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burne

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**EPA ID Number** 

11.

A ID NU	umber	0	K	D	U	U	0	7	6 3	8   8	2	1		OMB# 2050-0024; Expires 04/30/202
D. 1	Pharma	ceutic	al Ac	ctiviti	es									
	′	cals-	-if '	"Yes"		k only								ment of hazardous waste pharmaceuti- ructions for definitions of healthcare facility
			a.	Heal	thcar	e Fac	ility							
			b.	. Reve	erse C	Distrib	utor							
	'	phar	rmac	eutic	als. I	Note:	You	may or	nly wit	CFR Pa hdraw s waste	if you	are a	a he	t P for the management of hazardous wast althcare facility that is a VSQG for all of cals.
	Acade							-Notifi	cation	for op	ting ir	nto oi	r wit	thdrawing from managing laboratory hazar
	✓N	wast	tes ir	n labo	orato	ries—	If "Ye		irk all t	that ap				bpart K for the management of hazardous the item-by-item instructions for defini-
			1.	Colle	ge o	Univ	ersity	,						
			2.	Teac	hing	Hospi	tal th	at is ov	vned b	y or h	as a fo	ormal	wri	tten affiliation with a college or university
	_2		3.	Non-	profi	t Insti	tute (	that is	owned	by or	has a	form	al w	ritten affiliation with a college or universit
□ <sub></sub> v	✓ N	B. W	/ithd	İrawiı	ng fro	m 40	CFR I	Part 26	2, Sub	part K	for th	e ma	nag	ement of hazardous wastes in laboratories
Episo	dic Gen	eratio	n											
	✓N		ore 1	than (	60 da	ys, th	at mo	ves yo						nned or unplanned episodic event, lasting egory. If "Yes", you must fill out the
LQG C	onsolid	ation o	of VS	SQG I	lazar	dous	Wast	e						
Y	✓N	Are y	ou a	n LQ	G not	ifying	of co	onsolid						te Under the Control of the Same Person lendum for LQG Consolidation of VSQG
Notific	cation o	of LQG	Site	Closi	ure fo	or a Co	entral	l Accur	nulatio	on Are	a (CA	A) (oı	otio	nal) OR Entire Facility (required)
T	√N						-							Facility.
	<u></u>	Α.	-						-	Entir				
		B. E)								nm/dd,				
										n		d/vvv	v	
								mm/				-, ; ; ;		
								_			stan	dards	40	CFR 262.17(a)(8)
		=		-					-					s 40 CFR 262.17(a)(8)

Notification of Hazardous Secondary Material (HSM) Activity	D Number	U K	U	U	U	U		6	3	8	2	1	OMB# 2050-0024; Expires 04/30/2024
hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.  Electronic Manifest Broker  Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest syntem to obtain, complete, and transmit an electronic manifest under a contractual relationship with a haz ardous waste generator?  Comments (include item number for each comment)  Comments (include item number for each comments)  Comments (include item number for each comments and ali attachments were prepared under and contraction including half attachments were prep	Notification	of Hazan	dous :	Secoi	ndan	/ Mat	erial	(HSI	VI) Ac	tivity	,		
Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a haz ardous waste generator?  Comments (Include item number for each comment)  Certification I certify under penalty of law that this document and all attachments were prepared under my direction of the comment of the c	Y ØN	hazard	ous se	econo	dary r	nater	ial u	nder	40 C	FR 26	0.30,	40 CF	R 261.4(a)(23), (24), (25), or (27)? If "Yes", you
tem to obtain, complete, and transmit an electronic manifest under a contractual relationship with a haz ardous waste generator?  Comments (Include item number for each comment)  Certification   Certify under penalty of law that this document and all attachments were prepared under my direction wision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information. Including the person or persons who manage the system, or those persons directly responsible for the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. The that there are significant penalties for submitting false information, including the possibility of penalties for submitting false information, including the possibility of penalties for submitting false information, including the possibility of penalties for submitting false information, including the possibility of penalties for submitting false information, including the possibility of penalties for submitting false information, including the possibility of penalties for my knowledge and belief, true, accurate, and complete the third penalties for submitting false information, including the possibility of penalties and imprisonment and operators must significant and penalties for the RCRA Hazardous Waste Part A permit Application, all owners and operators must significant and penalties for the false of the penalties of the penalties for the false of	iectronic Ma	nifest Bı	roker										
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vision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for age the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. But there are significant penalties for submitting false information, including the possibility of fines and imprisonment violations. Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign at 270.10(b) and 270.11).  Signature of legal owner, operator or authorized representative  Date (mm/dd/yyyy)  Date (mm/dd/yyyy)  Title  VP Environmental Compliance  Email  mori.sorenson@safety-kleen.com  Signature of legal owner, operator or authorized representative  Date (mm/dd/yyyy)	Comments (li	nclude it	em nu	umbe	er for	each	com	men	t)				
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Printed Name (First, Middle Initial Last)  Mori Sorenson  Email  mori.sorenson@safety-kleen.com  Signature of legal owner, operator or authorized representative  Date (mm/dd/yyyy)	vision in accor mitted. Based g the informa re that there wing violation	rdance was done my interest on the state of	vith a inquin e infoi iifican e: <b>For</b>	syste y of t rmati t pen	m de he pe ion su alties	esigne erson ubmit s for s	ed to or po ted is subm	assu ersor s, to itting	re th as wh the b g false	at qua o ma est of e info	alified nage f my k rmati	person the sy nowle on, in	onnel properly gather and evaluate the informa /stem, or those persons directly responsible for edge and belief, true, accurate, and complete. I I cluding the possibility of fines and imprisonme
Printed Name (First, Middle Initial Last)  Mori Sorenson  Email  mori.sorenson@safety-kleen.com  Signature of legal owner, operator or authorized representative  Date (mm/dd/yyyy)	Signature of	f legal ov	wner,	ope	otor	or aut	thori	zed r	epre	senta	tive	Dat	
Mori Sorenson  Email  mori.sorenson@safety-kleen.com  Signature of legal owner, operator or authorized representative  Date (mm/dd/yyyy)		lor	1	_		_	7					MP7.A.1	
Email mori.sorenson@safety-kleen.com  Signature of legal owner, operator or authorized representative Date (mm/dd/yyyy)				ale In	ıπal L	.ast)						T I I	
	Email			n@sa	afety	-klee	n.c	om					
Printed Name (First, Middle Initial Last)  Title	Signature o	f legal o	wner,	oper	rator	or au	thori	zed i	repre	senta	itive	Dat	te (mm/dd/yyyy)
	Printed Na	me (First	, Mide	dle in	nitial I	Last)						Titl	e

K D 0 0 0 7 6 3 8 2	K D 0 0 0 7 6 3 8 2												
		1	К	D	0	0	0	7	6	3	8	2	l

## United States Environmental Protection Agency HAZARDOUS WASTE PERMIT PART A FORM



### 1. Facility Permit Contact

First Name	Boz	МІ	Last Name Cannon
Title	Branch General Manager	•	
Email	boz.cannon@safety-kleer	n.com	
Phone	918-234-5185	Ext N/A	Fax <b>N/A</b>

### 2. Facility Permit Contact Mailing Address

Street Address 16319	East Marshall Street	
City, Town, or Village <b>Tulsa</b>		
State <b>OK</b>	Country USA	Zip Code <b>74116</b>

3.	Facility	Existence	Date	lmm	/dd/	(www)
-0-	LOCHILLA	TVI31CIICE	vale		ruuz	****

1/1/1978	

#### 4. Other Environmental Permits

A. Permit Type	_		В	. Per	mit	Num	ber	C. Description		

#### 5. Nature of Business

This facility includes a local sales/service office and distribution/accumulation warehouse and tanks for clean and spent solvents and other industrial wastes. Safety-Kleen collects spent solvents and other wastes, either in storage tanks or in containers. Once a sufficient quantity of material is collected, it is shipped to an off-site facility.

### 6. Process Codes and Design Capacities

Li	Line		Process	Code	B. Process Des	sign Capacity	C. Process Total			
Nur	mber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name		
0	1	S	0	1	13,560	G	003	Container Storage Areas		
0	2	S	0	2	16,000	G	002	HW Storage Tank		

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

		A. EPA Hazardous				B. Estimated	C. Unit of	D. Processes								
Line	No.		Wast	e No.		Annual Qty of Waste	Measure	(1) Process Codes			es		(2) Process Description (if code is not entered in 7.D1))			
0	1	D	0	0	1	2,500,000	G	S	0	1	S	0	2			
0	2	D	0	0	4											Included with above
0	3	D	0	0	5											Included with above
0	4	D	0	0	6											Included with above
0	5	D	0	0	7											Included with above
0	6	D	0	0	8											Included with above
0	7	D	0	0	9											Included with above
0	8	D	0	1	0											Included with above
0	9	D	0	1	1											Included with above
1	0	D	0	1	8											Included with above
1	1	D	0	1	9											Included with above

#### 8. Map

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

### 9. Facility Drawing

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

#### 10. Photographs

11.

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

Co	mments			

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

	W 119	ve vi				В.		1	Processes								
Line No.		16700	A. Haza Wast	450	100	Estimated Annual Qty of Waste	C. Unit of Measure			(1	L) Pro	ocess	s Cod	les		(2) Process Description (if code is not entered in 7.D1)	
1	2	D	0	2	1									T		Г	Included with above
1	3	D	0	2	2								$\top$		$\vdash$		Included with above
1	4	D	0	2	3			Г						1		1	Included with above
1	5	D	0	2	4									$\top$		$\vdash$	Included with above
1	6	D	0	2	5												Included with above
1	7	D	0	2	6												Included with above
1	8	D	0	2	7			Т	$\vdash$		Т						Included with above
1	9	D	0	2	8											_	Included with above
2	0	D	0	2	9			Т					т	т		T	Included with above
2	1	D	0	3	0									$\vdash$		$\vdash$	Included with above
2	2	D	0	3	2												Included with above
2	3	D	0	3	3											$\vdash$	Included with above
2	4	D	0	3	4												Included with above
2	5	D	0	3	5												Included with above
2	6	D	0	3	6					$\Box$							Included with above
2	7	D	0	3	7												Included with above
2	8	D	0	3	8												Included with above
2	9	D	0	3	9												Included with above
3	0	D	0	4	0												Included with above
3	1	D	0	4	1							П				$\vdash$	Included with above
3	2	D	0	4	2												Included with above
3	3	D	0	4	3												Included with above
3	4	F	0	0	1		Ť	Ş	0	0	1						Included with above
3	5	F	0	0	2		T	S	0	0	1						
3	6	F	0	0	3		Ť	S	0	0	1						
3	7	F	0	0	5		Т	S	0	0	1						Included with above
													Г				
													П				



Figure 1: Main Office Building



Figure 2: West Warehouse



Figure 3: Inside West Warehouse



Figure 4: Inside East Warehouse



Figure 4: Metal Flammable Shelter



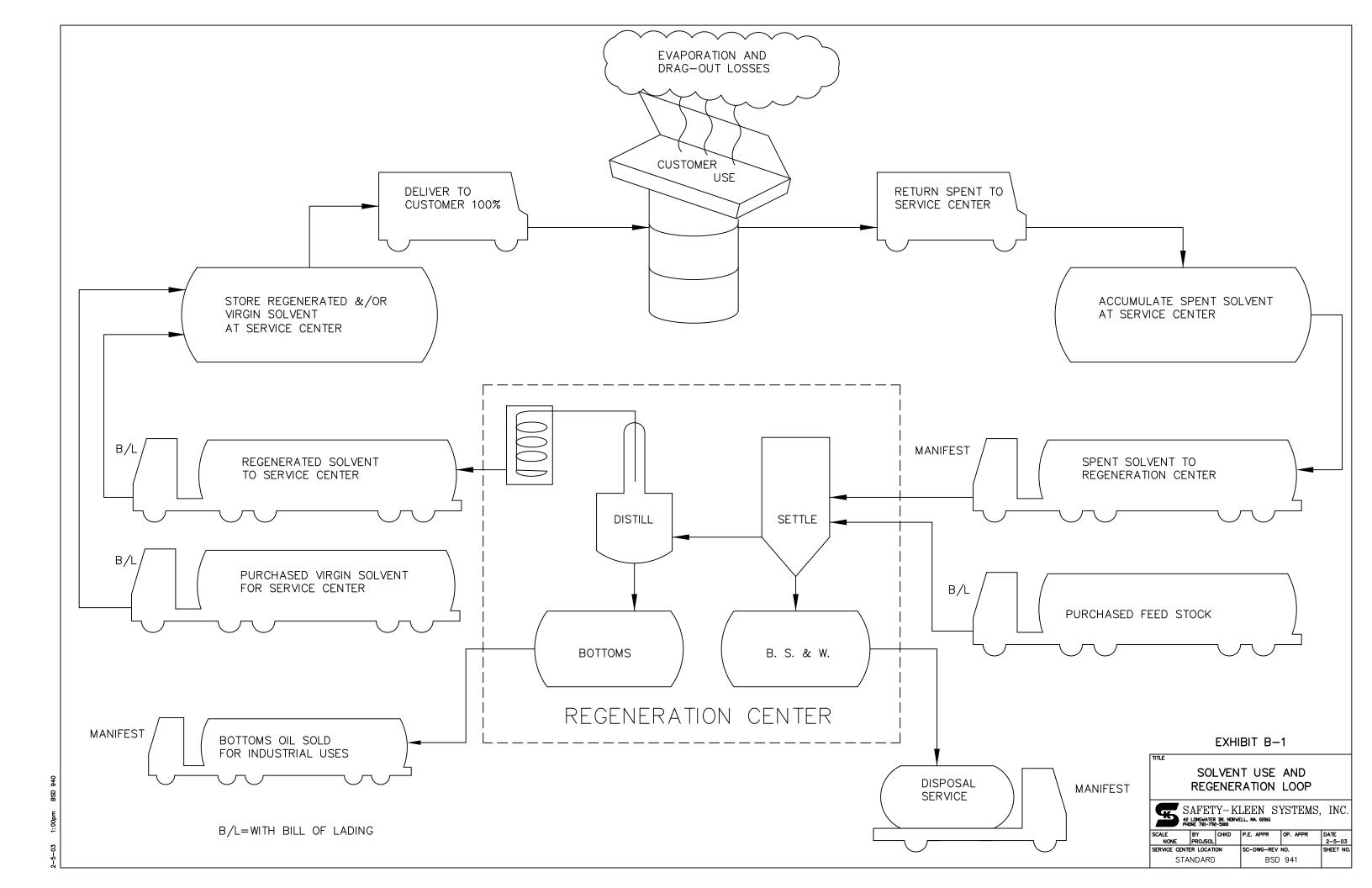
Figure 5: Return and Fill Station



**Figure 6: Tank Farm with Secondary Containment** 

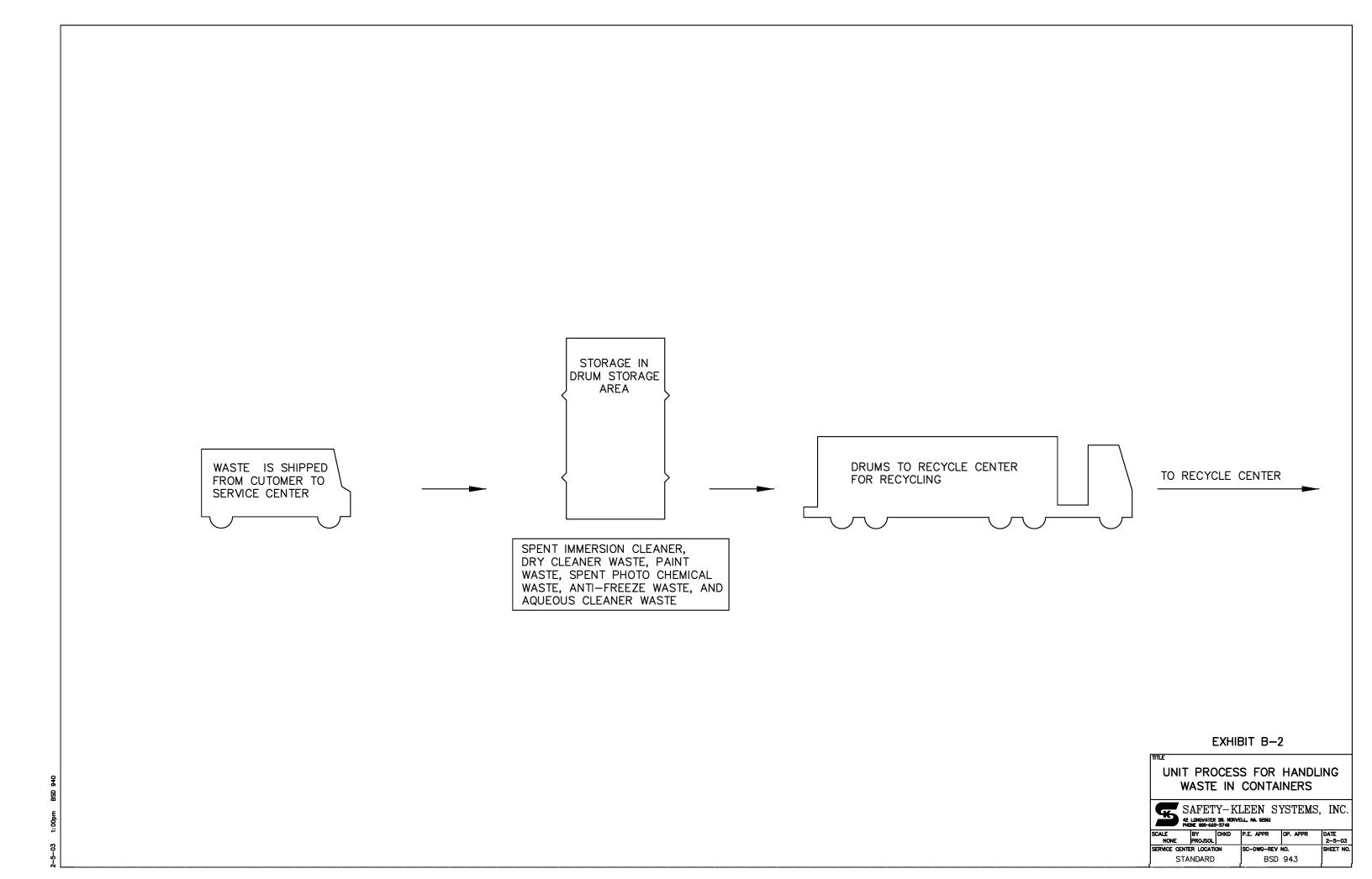
## APPENDIX B PROCESS FLOW DIAGRAMS

## Exhibit B-1 Safety-Kleen Solvent Use and Regeneration Loop



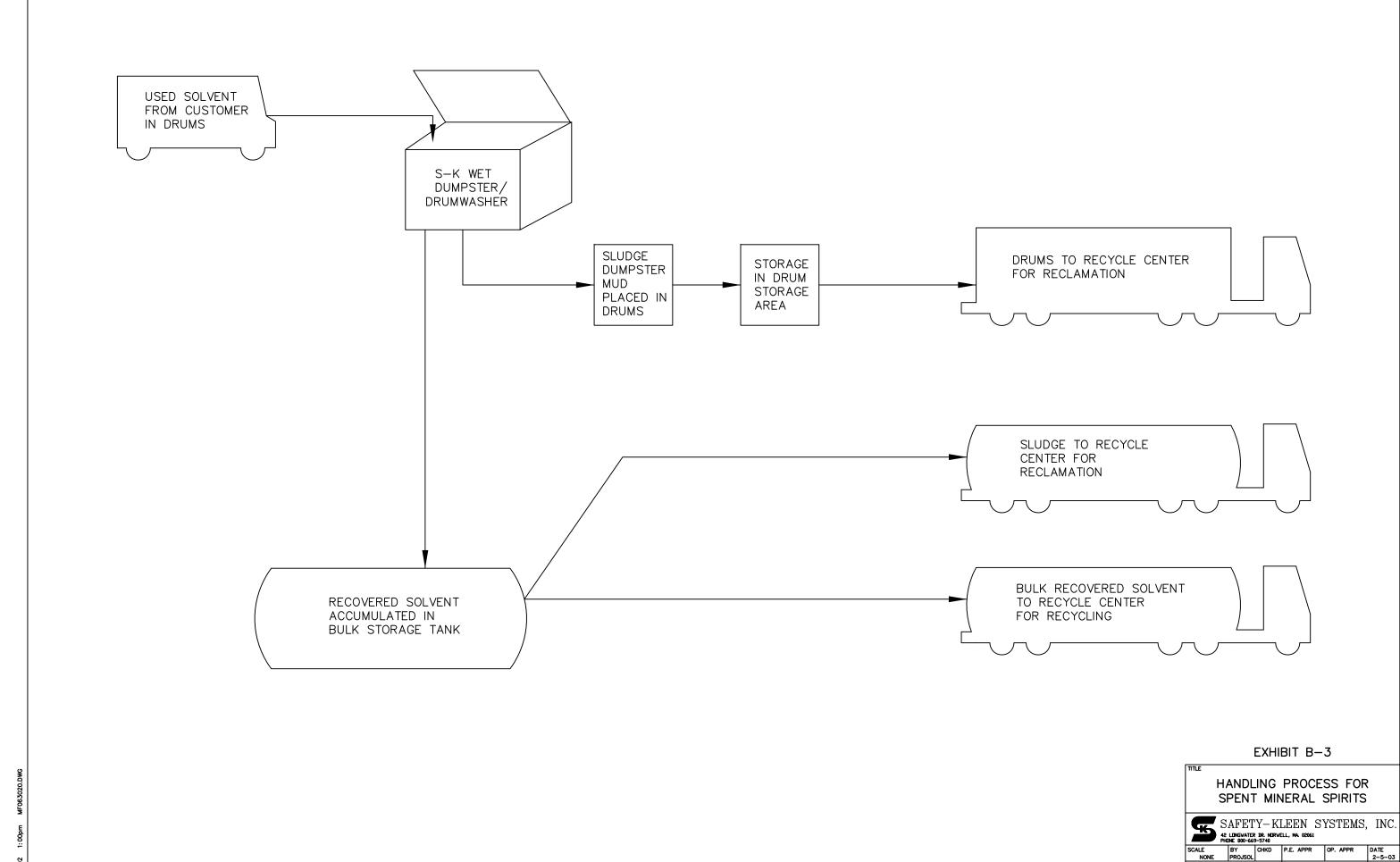
## Exhibit B-2

Process for the Handling of Spent Immersion Cleaner, Aqueous Parts Cleaner Waste and Dry-Cleaning Waste



## Exhibit B-3

Unit Process for The Handling of Spent Parts Cleaner Solvent



STANDARD

BSD 940

## APPENDIX C MAPS AND FACILITY DRAWINGS

# Exhibit C-1 Site Location Map

Tulsa



1 Emergency Exit



★ Fire Extinguisher

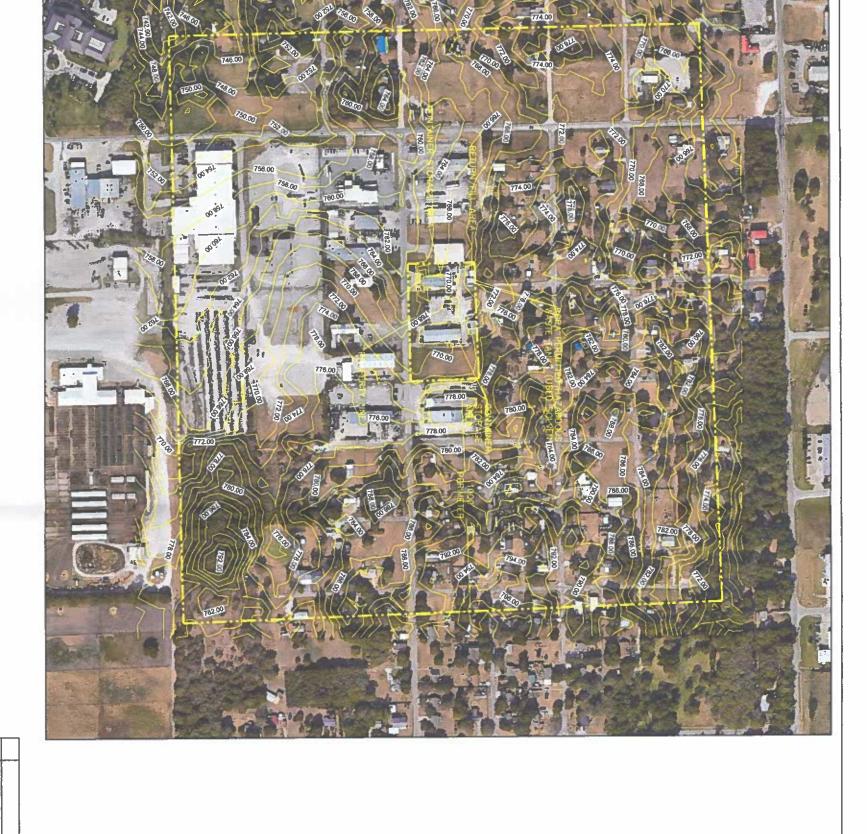


Rally Point



💢 Fire Hydrant

# Exhibit C-2 Topographic Map











NOTES:

1. ELEVATIONS BASED ON:
GOOGLE ELEVATION DATA SET (WORLD GEODETIC
SYSTEM OF 1984, THE DATA SET USES THE NORTH
AMERICAN VERTICAL DATUM OF 1988 (NAVD88) FOR
VERTICAL CONTROL OF ELEVATION.

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

SITE TOPO MAP 16319 E. MARSHALL TULSA, OK. 74116

TULSA, OK.

7015-SP00-026

0

THE PROJECT IS LOCATED IN ZONE "X" BASED ON FEMA PANEL 40109C0270H - EFF DATE 12/18/2009

# Exhibit C-3 Wind Rose Diagram





Wind Speed (mph)

1.3 - 4

4 - 8

**8** - 13

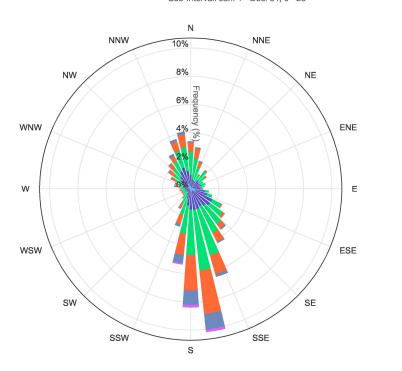
13 - 1919 - 2525 - 32

32 - 3939 - 4747 -

#### **EXHIBIT C-3**

### TULSA INTL AP (OK) Wind Rose

May 1, 2000 - May 3, 2024 Sub-Interval: Jan. 1 - Dec. 31, 0 - 23



#### TULSA INTL AP (OK) - Wind Frequency Table (percentage)

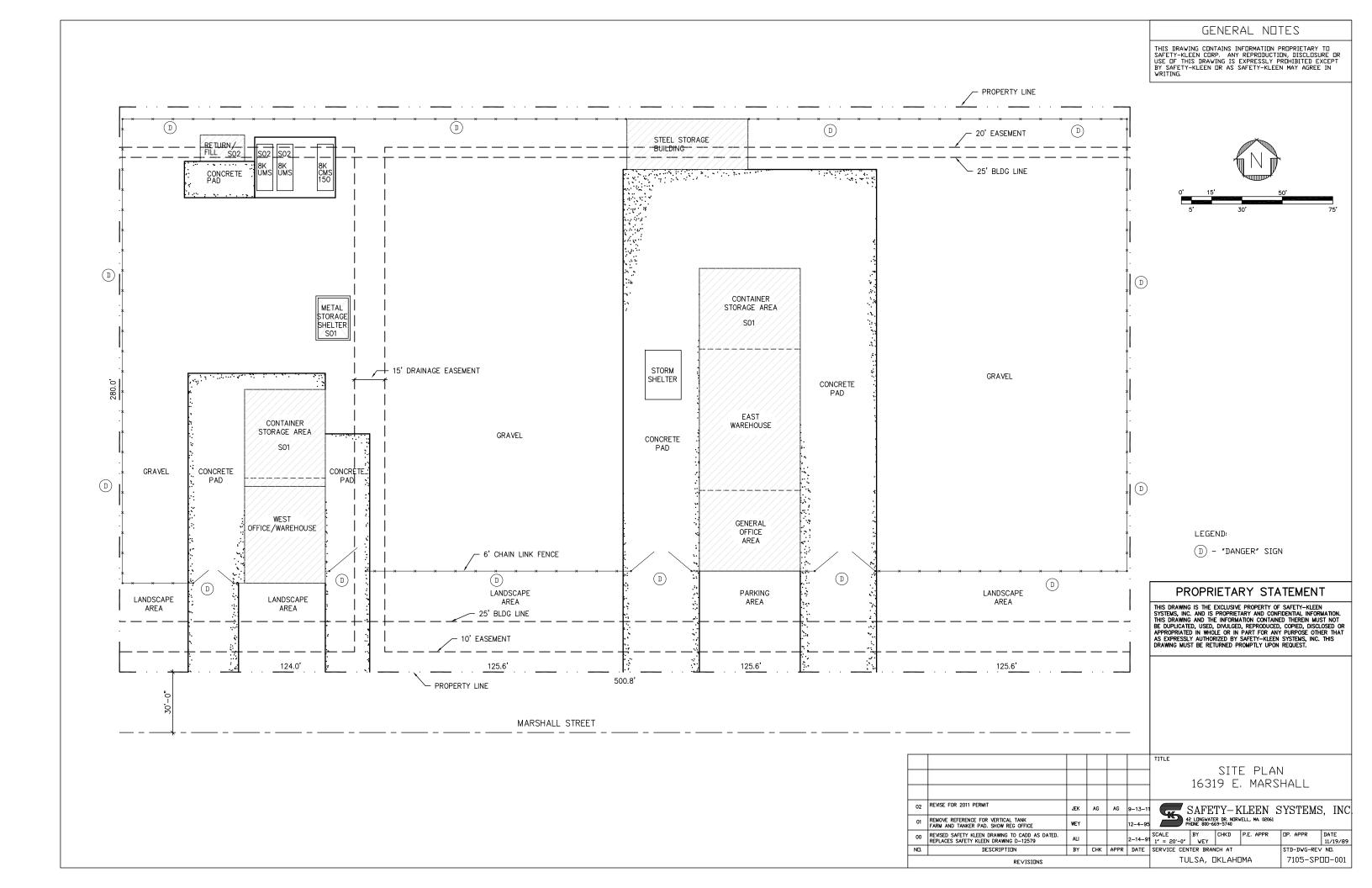
(<1.3)

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

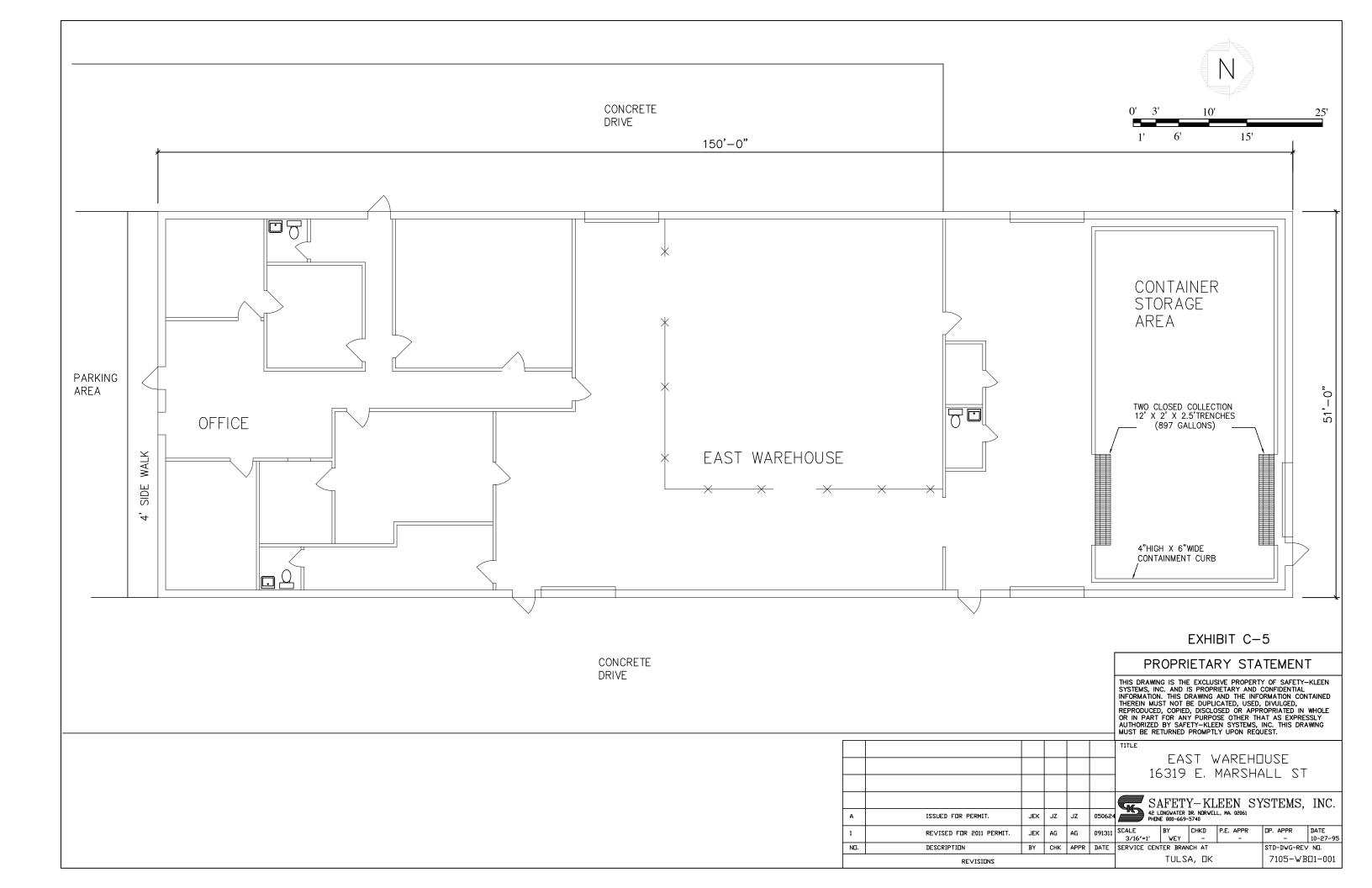
Range 10 20 30 40 50 60 70 80 90 100 110 120 130 140 150 160 170 180 190 200 210 220 230 240 250 260 270 280 0 (mph)  $0.2 \quad 0.1 \quad 0.2 \quad 0.1  4 - 8  $0.8 \quad 0.6 \quad 0.5 \quad 0.5 \quad 0.7 \quad 0.6 \quad 0.6 \quad 0.6 \quad 0.6 \quad 0.6 \quad 0.5 \quad 0.7 \quad 0.9 \quad 1.3 \quad 1.4 \quad 1.3 \quad 1.2 \quad 1.3 \quad 1.3 \quad 1.3 \quad 1.0 \quad 0.6 \quad 0.4 \quad 0.2 \quad 0.2 \quad 0.2 \quad 0.3 \quad 0.3 \quad 0.4 \quad 0.2 \quad 0.3 \quad 0.3 \quad 0.4 \quad 0.3 \quad 0.4  1.6 1.5 1.0 0.5 0.8 0.6 0.3 0.3 0.2 0.2 0.3 0.4 0.7 1.1 1.6 2.1 3.4 4.3 3.2 2.0 1.2 0.7 0.5 0.3 0.3 0.2 0.3 0.4 0.7 8 - 13  $0.1 \quad 0.1 \quad 0.1 \quad 0.0 \quad 0.1 \quad 0.1 \quad 0.2 \quad 1.1 \quad 1.0 \quad 0.6 \quad 0.2 \quad 0.1 \quad 0.0 \quad 0.0 \quad 0.0 \quad 0.0 \quad 0.0 \quad 0.0 \quad 0.1  19 - 25  $0.0 \quad 0.0  Total(%) 3.4 3.0 2.0 1.2 1.8 1.4 1.1 1.0 1.0 1.0 1.3 1.7 2.5 3.1 3.6 4.2 6.6 10.2 8.4 5.4 2.9 1.6 0.9 0.7 0.7 0.7 0.8 0.8 1.1 Calm

Ave Speed 10.6 10.8 10.2 8.5 8.5 7.8 7.0 6.5 6.3 6.4 6.3 6.4 7.0 7.8 8.9 9.8 10.8 12.9 13.0 12.4 11.5 10.4 9.2 9.0 9.1 9.2 9.1 9.3 9.8 Midwestern Regional Climate Center cli-MATE: MRCC Application Tools Environment Generated at: 5/3/2024 12:40:38 PM EDT

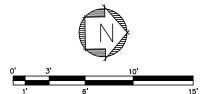
## Exhibit C-4 Site Plan

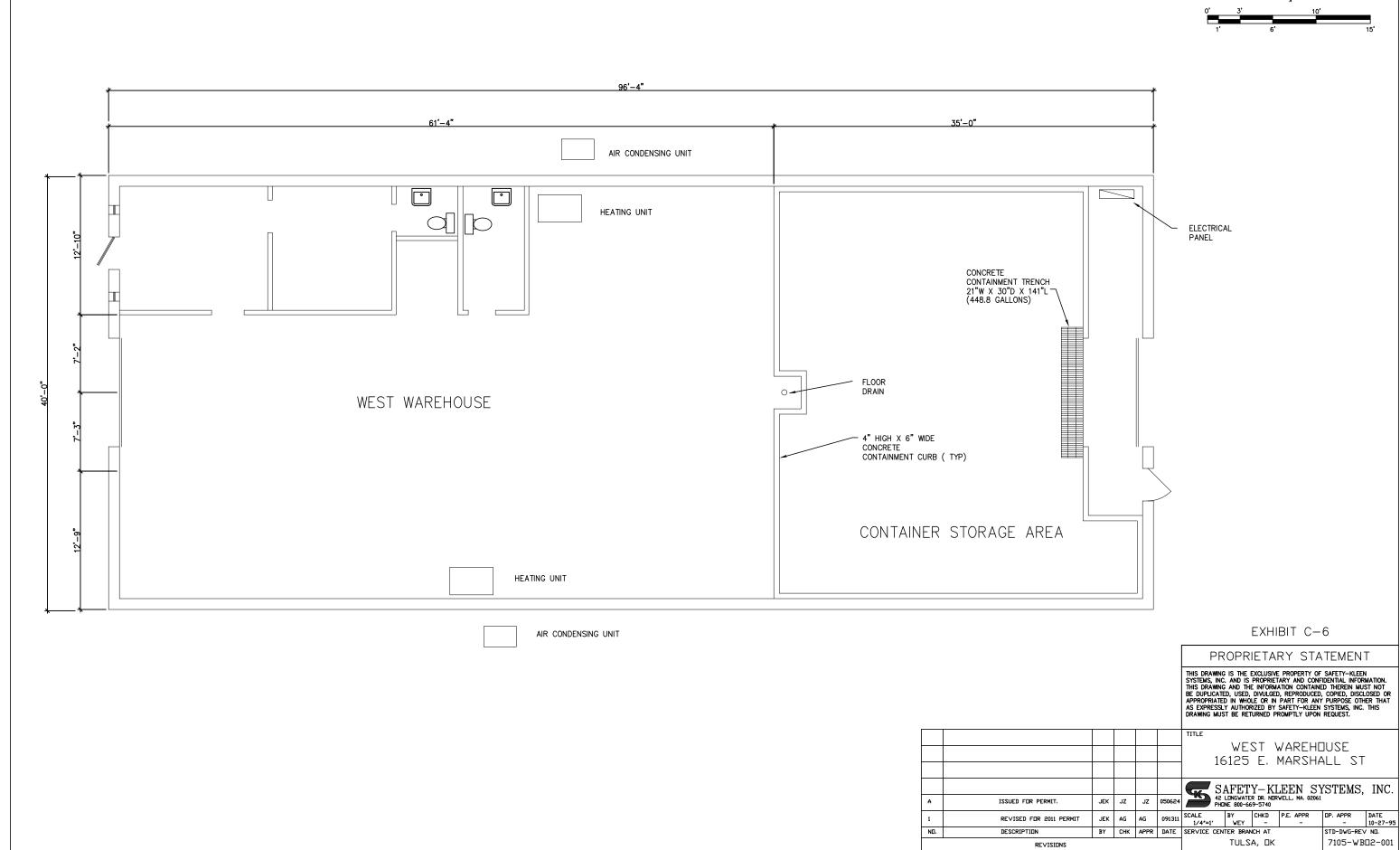


## Exhibit C-5 East Warehouse Floor Plan



## Exhibit C-6 West Warehouse Floor Plan





## Exhibit C-7 FEMA Floodplain Map

## NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The **community map repository** should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations** (BFEs) and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) Report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS Report should be utilized in conjunction with the FIRM for purposes of construction and/or floodplain management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stillwater Elevations table in the Flood Insurance Study Report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations table should be used for construction and/or floodplain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study Report for this jurisdiction.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study Report for information on flood control structures for this jurisdiction.

The **projection** used in the preparation of this map was Oklahoma State Plane North Zone (FIPS zone 3501). The **horizontal datum** was NAD 83, GRS 1980 spheroid. Differences in datum, spheroid, projection or UTM zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same **vertical datum**. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at <a href="http://www.ngs.noaa.gov">http://www.ngs.noaa.gov</a> or contact the National Geodetic Survey at the following address:

NGS Information Services NOAA, N/NGS12 National Geodetic Survey SSMC-3, #9202 1315 East-West Highway Silver Spring, Maryland 20910-3282

To obtain current elevation, description, and/or location information for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at **(301) 713- 3242**, or visit its website at <a href="http://www.ngs.noaa.gov">http://www.ngs.noaa.gov</a>.

Base map information shown on this FIRM was provided in digital format by the Geo Information Systems Department of the University of Oklahoma and the Indian Nations Council of Governments (INCOG). Aerial background provided by the USDA Farm Service Agency's National Agriculture Imagery Program NAIP) flown in 2010.

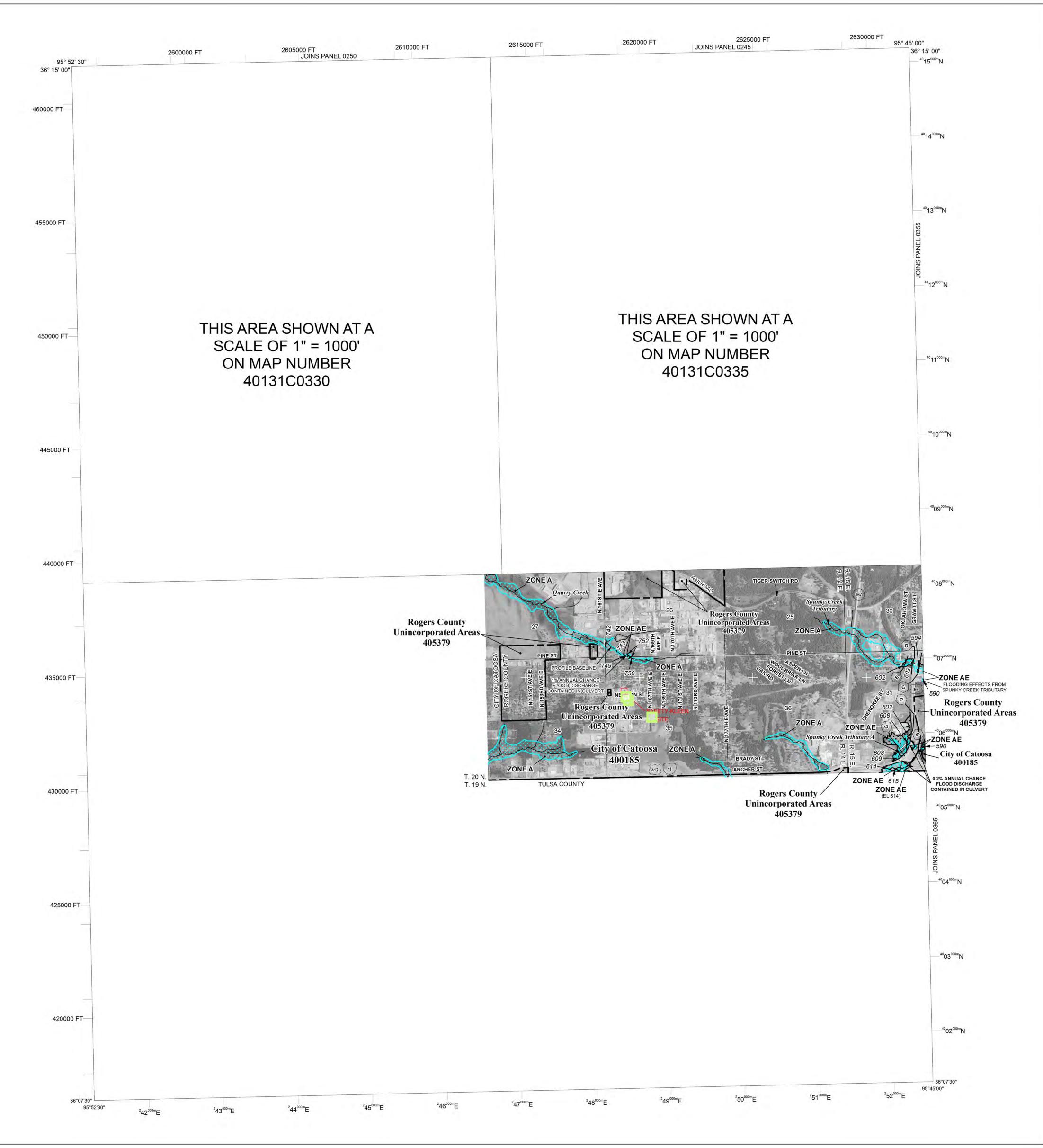
This map reflects more detailed and up-to-date **stream channel configurations** than those shown on the previous FIRM for this jurisdiction. The floodplains and floodways that were transferred from the previous FIRM may have been adjusted to conform to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables for multiple streams in the Flood Insurance Study Report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on this map.

Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

For information on available products associated with this FIRM visit the Map Service Center (MSC) website at <a href="http://msc.fema.gov">http://msc.fema.gov</a>. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the MSC website.

If you have questions about this map, how to order products, or the National Flood Insurance Program in general, please call the FEMA Map Information eXchange (FMIX) at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA website at <a href="http://www.fema.gov/national-flood-insurance-program">http://www.fema.gov/national-flood-insurance-program</a>.



## **LEGEND**

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

ZONE A
 No Base Flood Elevations determined.

 ZONE AE Base Flood Elevations determined.
 ZONE AH Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
 ZONE AO Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.

flood by a flood control system that was subsequently decertified. Zone
AR indicates that the former flood control system is being restored to provide
protection from the 1% annual chance or greater flood.

ZONE A99

Area to be protected from 1% annual chance flood by a Federal flood
protection system under construction; no Base Flood Elevations determined.

ZONE V

Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations

Special Flood Hazard Areas formerly protected from the 1% annual chance

Coastal flood zone with velocity hazard (wave action); Base Flood Elevations

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

ZONE X Areas determined to be outside the 0.2% annual chance floodplain.

ZONE D Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

1% Annual Chance Floodplain Boundary

0.2% Annual Chance Floodplain Boundary
 Floodway boundary

Zone D boundary

CBRS and OPA boundary

Boundary dividing Special Flood Hazard Area Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations,

flood depths, or flood velocities.

Limit of Moderate Wave Action

Base Flood Elevation line and value; elevation in feet\*

Base Flood Elevation line and value; elevation in feet\*

(EL 987)

Base Flood Elevation value where uniform within zone; elevation in feet\*

\*Referenced to the North American Vertical Datum of 1988

(A) Cross section line

(23) - - - - - (23) Transect line

Bridge

3° 02' 12" Geographic coordinates referenced to the North American Datum of 1983 (NAD 83) Western Hemisphere

5000-foot ticks: Oklahoma State Plane North Zone

3100000 FT

5000-foot ticks: Oklahoma State Plane North Zone
(FIPS Zone 3501), Lambert Conformal Conic projection

1000-meter Universal Transverse Mercator grid values, zone 15N

DX5510

Bench mark (see explanation in Notes to Users section of this FIRM panel)

NI.5

River Mile

MAP REPOSITORIES

Refer to Map Repositories list on Map Index

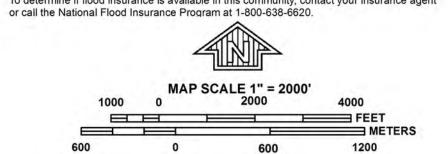
EFFECTIVE DATE OF COUNTYWIDE
FLOOD INSURANCE RATE MAP
April 3, 2012

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL

September 30, 2016 - to change Base Flood Elevations and Special Flood Hazard Areas.

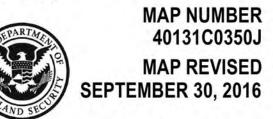
For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your insurance agent



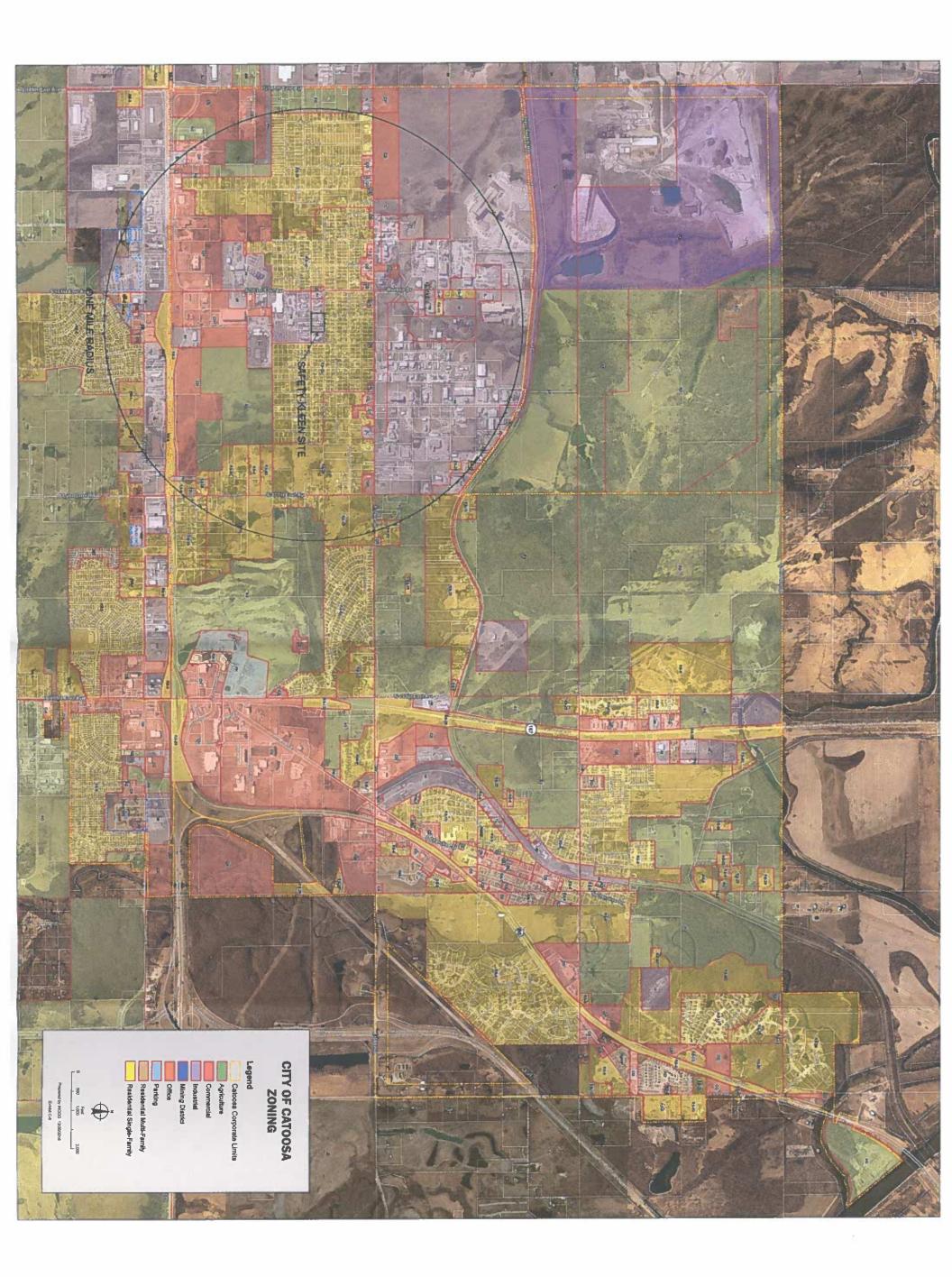
### PANEL 0350J **FIRM** FLOOD INSURANCE RATE MAP ROGERS COUNTY, **OKLAHOMA** AND INCORPORATED AREAS PANEL 350 OF 475 (SEE MAP INDEX FOR FIRM PANEL LAYOUT) CONTAINS: COMMUNITY PANEL SUFFIX 400185 CATOOSA, CITY OF 0350 405379 ROGERS COUNTY 0350

Notice to User: The **Map Number** shown below should be used when placing map orders; the **Community Number** shown above should be used on insurance applications for the subject community.



Federal Emergency Management Agency

### Exhibit C-8



### APPENDIX D ANALYTICAL DATA

# Exhibit D-1 Annual Recharacterization Statistical Model



### DEPARTMENTS OF MEDICINE, PUBLIC SCIENCES, PSYCHIATRY, COMPARATIVE HUMAN DEVELOPMENT

5841 S. Maryland Ave., MC 2007 office W260, Chicago, IL 60637 Phone 773-834-8692; Fax 773-702-1979

#### Robert D. Gibbons, PhD

Blum-Riese Professor of Biostatistics Committee on Quantitative Methods in Social, Behavioral and Health Sciences Director, Center for Health Statistics rdg@uchicago.edu

August 7, 2018

#### A Review of the Safety Kleen Statistical Waste Characterization Plan

In 1998, I prepared an annual statistical waste characterization plan for Safety Kleen based on a fully nonparametric approach to computing the 90% upper confidence limit for the 50<sup>th</sup> percentile of the distribution of analytic measurements. The motivation for the nonparametric approach was based on the non-normality of the distribution of analytic measurements observed at that time and even more importantly, the large proportion of measurements that did not detect the analyte in the sample; so called "non-detects." Motivation for this methodology was laid out in U.S. EPA SW846 (1986) and more recently in the U.S. EPA Unified Statistical Guidance Document (2009) see section 21.2. As noted in the Unified Guidance, "The advantage of a nonparametric interval around the median is its greater flexibility to define confidence intervals on non-normal data sets."

Recently, IL EPA has suggested that based on the OSWER 2002 Guidance, the nonparametric UCL that has been in use over the past 20 years should be replaced by the Chebyshev Inequality Method, which is a distribution free method. Using this method, the computed UCL for tetrachloroethylene (PCE) exceeded the regulatory standard whereas the nonparametric UCL did not. In the following, I try to shed light on this discrepancy.

To begin, nonparametric UCLs and distribution-free UCLs are in fact quite different. While neither method assumes a specific parametric form for the analyte distribution, the distribution free methods (e.g., Chebyshev Inequality Method) rely upon having a known population variance or standard deviation. Of course we never know the true standard deviation for the population, so practitioners typically substitute the observed standard deviation. As such, they are incorrect from the start. As noted in this guidance document, these distribution free methods break down when the detection frequency is low as is the case here. For PCE, only 8 of 31 measurements were detected (25.8%), and the largest measurement is an order of magnitude larger than the second largest measurement (51.72 vs. 5.8) suggesting the possibility that it is an outlier. As noted in the OSWER guidance, "If the proportion of non-detects is high (75%) or the number of samples is small (n<5), no method will work well." This is true for the parametric or distribution free methods described in the document, but this is not true for the nonparametric methods (with n>20) that have been used by Safety Kleen for the past 20 years. In fact, the nonparametric methods are based only on the rank ordering of the data and do not require either known or estimated values of the mean and variance as the distribution-free methods do and which break down in the presence of large numbers of non-detects and/or extreme skewness "As skewness increases further, the Chebyshev method is not recommended". The skewness of the PCE data produced by the large number of non-detects for which IEPA imputed DL/2 and the presence of a single extreme value is an example of extreme skewness. Non-detects and skewness have no effect on the nonparametric UCL used by Safety Kleen for the past 20 years and there are no distributional assumptions or summary statistics required to compute the UCL.

Sincerely yours,

Robert D. Gibbons Ph.D.

#### Statistical Analysis of Annual Waste Characterization Data

Prepared by Robert D. Gibbons Ph.D.

for

Safety Kleen July 23, 1998

#### 1 Introduction

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

<sup>&</sup>lt;sup>1</sup>"Consequently, the CI employed to evaluate solid wastes is, for all practical purposes, a 90% interval." U.S. EPA SW846 (1986) chapter 9 page 6.

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

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

#### 2 Method

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

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

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

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

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

$$1 - \alpha = 1 - Bin(U - 1; n...5)$$

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

<sup>&</sup>lt;sup>4</sup> "If the data do not adequately follow the normal distribution even after logarithm transformation, a nonparametric confidence interval can be constructed." U.S. EPA, 1989

<sup>&</sup>lt;sup>5</sup> "This interval is for the median concentration (which equals the mean if the distribution is symmetric)." U.S. EPA (1989), page 6-8

#### 3 Illustration

Consider the following most recent 50 data values for PCE (D039) obtained from Premium Gold Parts Washer Solvent-150.

Table 1
Premium Gold Parts Washer Solvent - 150
50 most recent samples in order of increasing concentration in ppm

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

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

#### 4 Conclusion

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

### Exhibit D-2 Annual Recharacterization Data Summary (Sample)

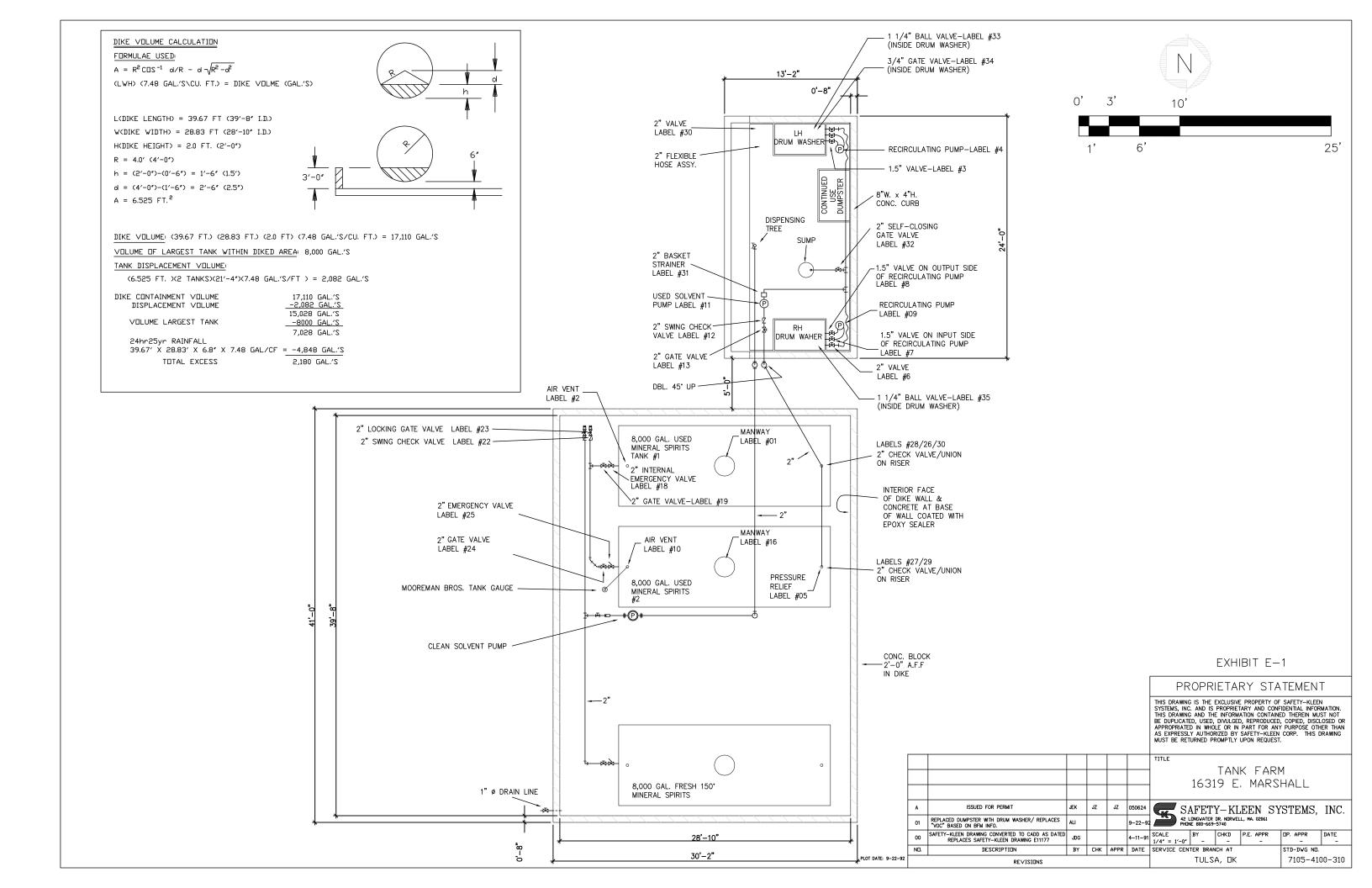
#### 2024 AR Codes and SKDOTS March 2024 - National

Waste Stream	Description Subcategory	Changes from 2022 to 2023	2023 National Waste Codes	2023 NATIONAL Profile	Changes from 2023 to 2024	2024 National Waste Codes	2024 NATIONAL Profile
Branch Contaminated Debris (Solid would not carry D001)	N/A	No Change	F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043	Refer to CH Outbound	No Change	F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D032, D032, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043	Refer to CH Outbound
Immersion Cleaner	N/A	No Change	D039, D040	153634	No Change	D039, D040	153634
Parts Washer Solvent 105 Virgin	under 100 lbs over 100 lbs (RQ) Non-RQ DF container (no DOT SP)	No Change	D001, D018, D039, D040	150045 150085 157045	No Change	D001, D018, D039, D040	150045 150085 157045
Bulk MS Solvent	NA	No Change	D001, D018, D039, D040	Refer to CH Outbound	No Change	D001, D018, D039, D040	Refer to CH Outbound
Parts Washer Solvent Sludge/Dumpster Mud	N/A	No Change	D001, D018, D039, D040	Refer to CH Outbound	No Change	D001, D018, D039, D040	Refer to CH Outbound
Parts Washer Solvent Tank Bottoms (bulk)	N/A	No Change	D001, D018, D039, D040	Refer to CH Outbound	No Change	D001, D018, D039, D040	Refer to CH Outbound
Premium (150) / PRF / PDF Mil Spec Solvent	N/A DF container (no DOT SP)	No Change	D039	150055 157055	No Change	D039	150055 157055
Paint Gun Cleaner	under 100 lbs over 100 lbs (RQ)	No Change	F003, F005, D001, D018, D035, D039, D040	150380 150425	No Change	F003, F005, D001, D018, D035, D039, D040	150380 150425
Paint Gun Cleaner (Premium Thinner)	under 100 lbs over 100 lbs (RQ)	No Change	F003, F005, D001, D018, D035, D039, D040	158380 158381	No Change	F003, F005, D001, D018, D035, D039, D040	158380 158381
Clear Choice Paint Gun Cleaner	under 100 lbs over 100 lbs (RQ)	No Change	F003, D001, D018, D035, D039, D040	150426 150427	No Change	F003, D001, D018, D035, D039, D040	150426 150427
Paint Waste Other	Any size container	No Change	F003, F005, D001, D018, D035, D039, D040	150375	No Change	F003, F005, D001, D018, D035, D039, D040	150375
Universal Paint Gun Cleaner	N/A	No Change	D001, D018, D035, D039, D040	403901294	No Change	D001, D018, D035, D039, D040	403901294
Dry Cleaner (Perc) Bottoms	N/A	No Change	F002, D007, D039, D040	150589	No Change	F002, D007, D039, D040	150589
Dry Cleaner (Perc) Filters	N/A	No Change	F002, D007, D039, D040	150621	No Change	F002, D007, D039, D040	150621
Dry Cleaner (Perc) Separator Water	N/A	No Change	F002, D039, D040	150520	No Change	F002, D039, D040	150520
Dry Cleaning Naphtha Bottoms	N/A	No Change	D001, D007, D039, D040	150422	No Change	D001, D007, D039, D040	150422
Dry Cleaning Naphtha Filters	N/A	No Change	D001, D007, D039, D040	150424	No Change	D001, D007, D039, D040	150424
Dry Cleaning Naphtha Separator Water	N/A	No Change	D001, D039, D040	150423	No Change	D001, D039, D040	150423

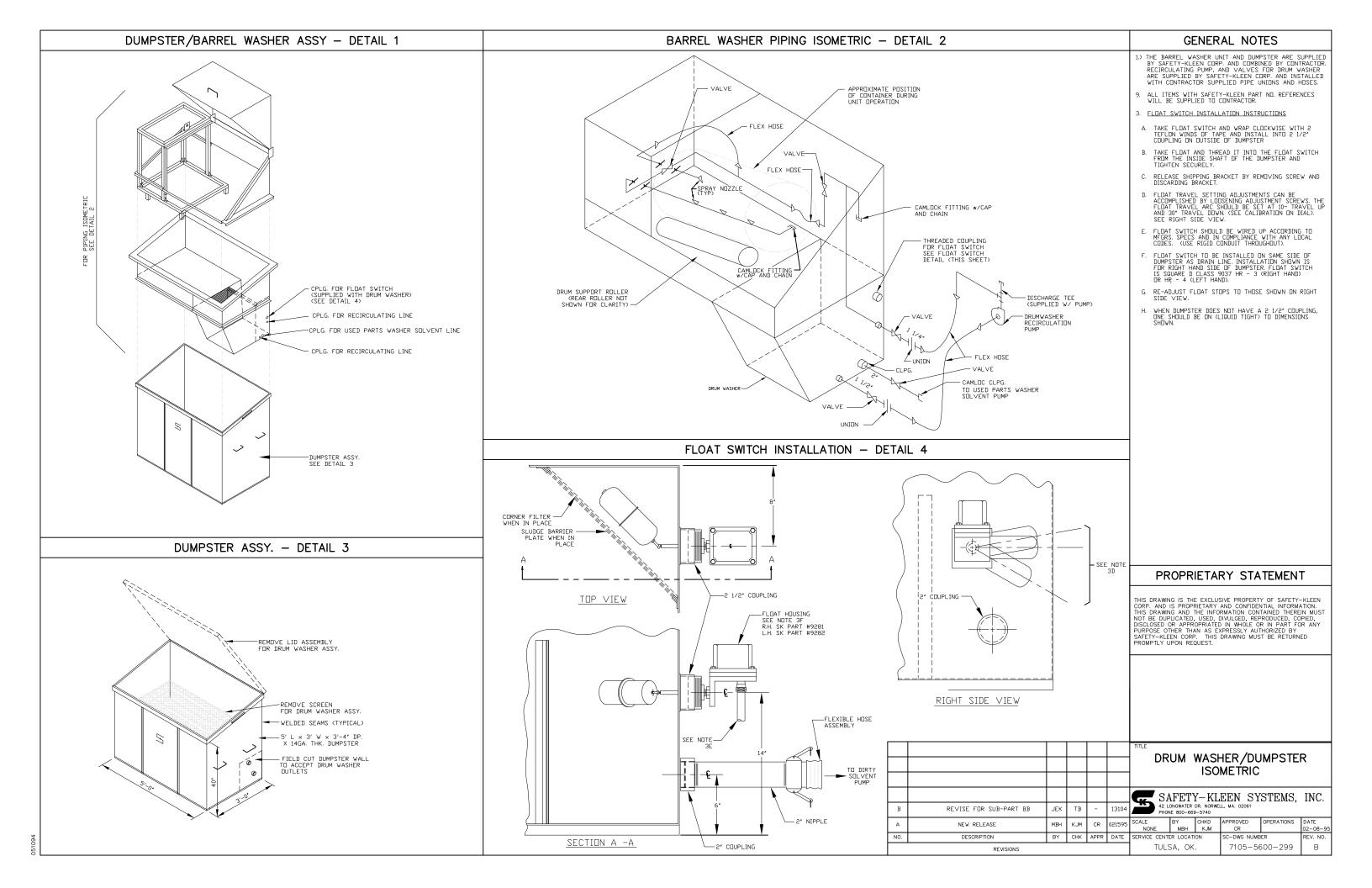
Exhibit D-1 May 2024

# APPENDIX E EQUIPMENT INFORMATION

# Exhibit E-1 Tank Farm Plan



# Exhibit E-2 Drum Washer Schematic and Details



### Exhibit E-3 Moorman Brothers Tank Gauge Installation Details

# ADJUSTABLE ANGULAR FLANGE (EXTRA) TAPE CLAMP AT FLOAT TANK RAISED ON ~

### MODEL 7-S VERTICAL BULK STORAGE TANK GAUGE

#### MATERIAL LIST MODEL 7-S

1. GAUGE HOUSING BASE SUPPORT.

2. 1" GALVANIZED PIPE (CUT TO LENGTH).

3. TANK ROOF FLANGE.

4. 2" TANK OPENING PIPE.

5. 2" GALVANIZED PIPE (CUT TO LENGTH).

6. 1" GALVANIZED NIPPLE (ANY LENGTH).

7. 1	!" GAL∨ANIZED UNION.		
	PART NAME	PART NO.	QUANTITY PER UNIT
8. [	JBSERVATION WINDOW ASSEMBLY	A-34-A-38	1
9. F	FLOAT	V-75	1
10.	STAINLESS STEEL TAPE CLAMP & SCREWS	V-93	1
11.	ELBOW ASSEMBLY COMPLETE	A-30, A-33	2
12.	2' TO 1' REDUCING BUSHING		1
13.	ECCENTRIC CAP COMPLETE WITH NUTS & BOLTS	V-71	1
14.	PULLEY RACK ASSEMBLY	V-73	2
15.	LUFKIN STAINLESS STEEL HIGH VISIBILITY TAPE	V-49	1
16.	RUST-PROOFED STEEL GAUGE HOUSING	V-77	1
17.	COUNTERVEIGHT	V-72	2
18.	CONDENSATION DRAIN PLUG		1
	FRAME & LID ASSEMBLY FOR OBSERVATION WINDOW	A-34, A-38	1
	GASKETS - SET FOR OBSERVATION WINDOW	V-81, V-82	1
	GASKET - ELBOW CAP	V-83	2
	GASKET - V-71 ECCENTRIC CAP	V-84	1
	GLASS - WINDOW	V-86	1
	STAINLESS STEEL INDICATOR FINGER FOR OBSERVATION WINDOW	V-94	1
	WIRE PIN - STAINLESS STEEL	V-96	5

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#### GENERAL NOTES

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

REVISE FOR SUB-PART BB TB 
 MBH
 KJM
 070292
 SCALE N.T.S.
 BY SCHKD
 CHKD APPR APPR APPR DATE
 SERVICE CENTER LOCATION
 SC-DWG NI
 RELEASED FOR PART "B" PERMIT DESCRIPTION TULSA, OK.

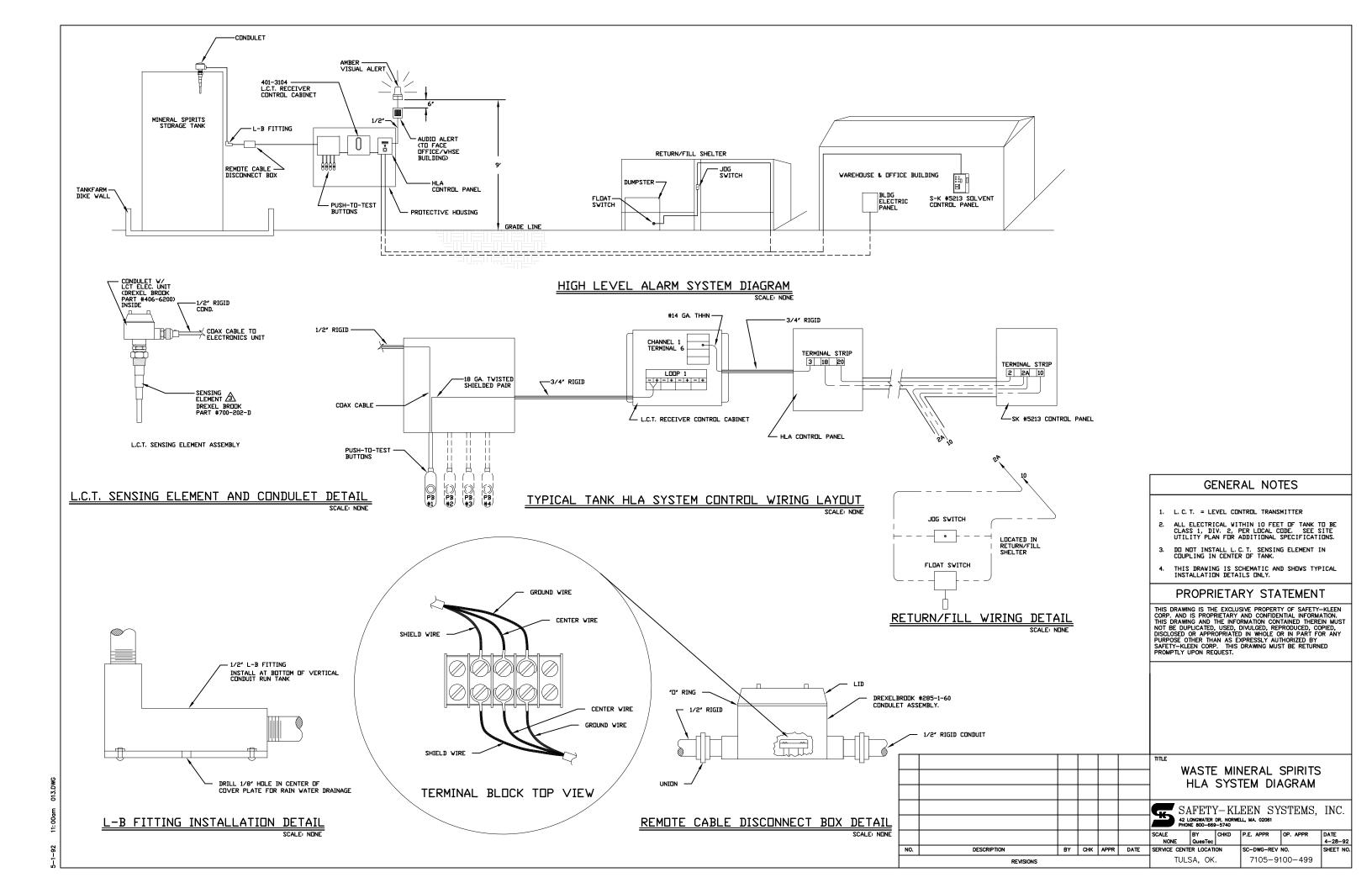
REVISIONS

MOORMAN BROS. TANK GAUGE DET.

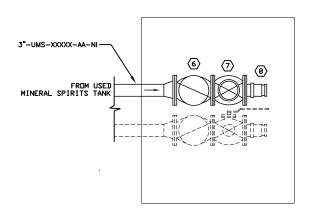
- 13104 SAFETY-KLEEN SYSTEMS, INC. 42 LONGWATER OF. NORWELL, MA. 02061 DATE 06-30-92 REV. NO. SC-DWG NUMBER

7105-4100-298

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



# Exhibit E-5 Spent Parts Washer Solvent 8,000 Gallon Horizontal Storage Tanks



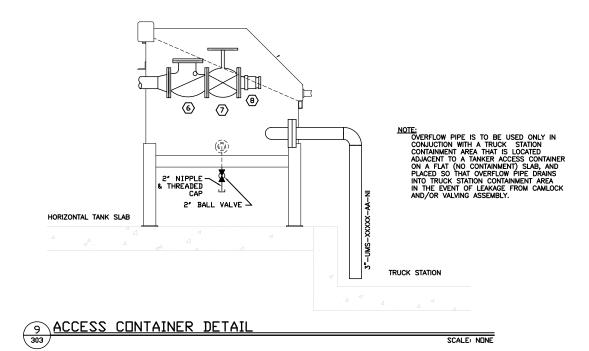
1/2' A36 PLATE FLANGE
BURE AS REQUIRED TO
ACCEPT PIPE

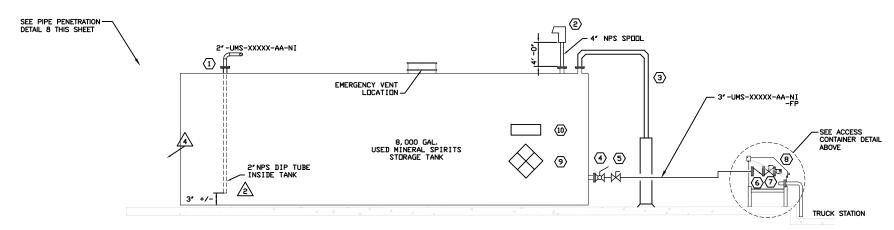
REMOVABLE LIQUID FILL PIPE
INTO UNS STORAGE TANK,
PIPING TO BE WITHIN 3' OF
STORAGE TANK BOTTOM.

12 ACCESS CONTAINER PLAN

SCALE: NONE

8 TANK DOME PIPING PENETRATION DETAIL
SCALE: NONE





USED MINERAL SPIRITS TANK PIPING ELEVATION (ARED TANK)

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

	EQUIPMENT	SCHEDULE	
MARK	PART DESCRIPTION	MANUFACTURER MODEL NUMBER	REMARKS
1	3/8' VACUUM BREAKER	MORRISON 134-A	
2	3' SCREWED PRESSURE VAXCUUM VENT	MORRISON 548	SP= 2oz. PRESSURE, 1oz. VACUUM
3	TANKK LECVEL GAUGE	M□RRIS□N 7-S	
4	3' INTERNAL EMERGENCY VENT	MORRISON 272 HO	
(5)	3' DUCTILE IRON GATE VALVE	MORRISON 235 DI	
6	3' CHECK VALVE	MORRISON 246 A	
7	3' GATE VALVE	MORRISON 235 B	
8	3' CAMLOCK W/CAP	MORRISON 735LAT	
9	NFPA MATERIAL I. D. PLACARD		DISPLAY IN PLAIN SIGH ABOVE DIKE WALL
(10)	COMBUSTABLE KEEP AWAY SIGN		DISPLAY IN PLAIN SIGH ABOVE DIKE WALL

#### GENERAL NOTES

- ACCESS CONTAINER FURNISHED BY OWNER. SEE DWG. BSD 910.
- 2. SUPPORT LOWER END OF DIP TUBE FROM TANK FLOOR AS REQUIRED.
- SEE DWG. 4100-298 FOR ACTUAL LOCATION OF LEVEL GAUGE HEAD.
- 4. UMS AND UOW PIPING TO BE HEAT TRACED AND INSULATED. SEE DWG. BSD 407, 408.
- . PIPING TO CONFORM TO ASME B31.3, REFERENCE SAFETY-KLEEN CORP.'S PIPING SPECIFICATIONS.
- 6. TANKS TO BE U.L. LISTED AND BE SO LABELED.

#### LEGEND

 ${\sf CMS} = {\sf CLEAN}$  MINERAL SPIRITS

UMS = USED MINERAL SPIRITS

UO = USED OIL

UO/W = USED OIL/OILY WATER UA = USED ANTIFREEZE

INDICATES CLOSED GATE VALVE

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

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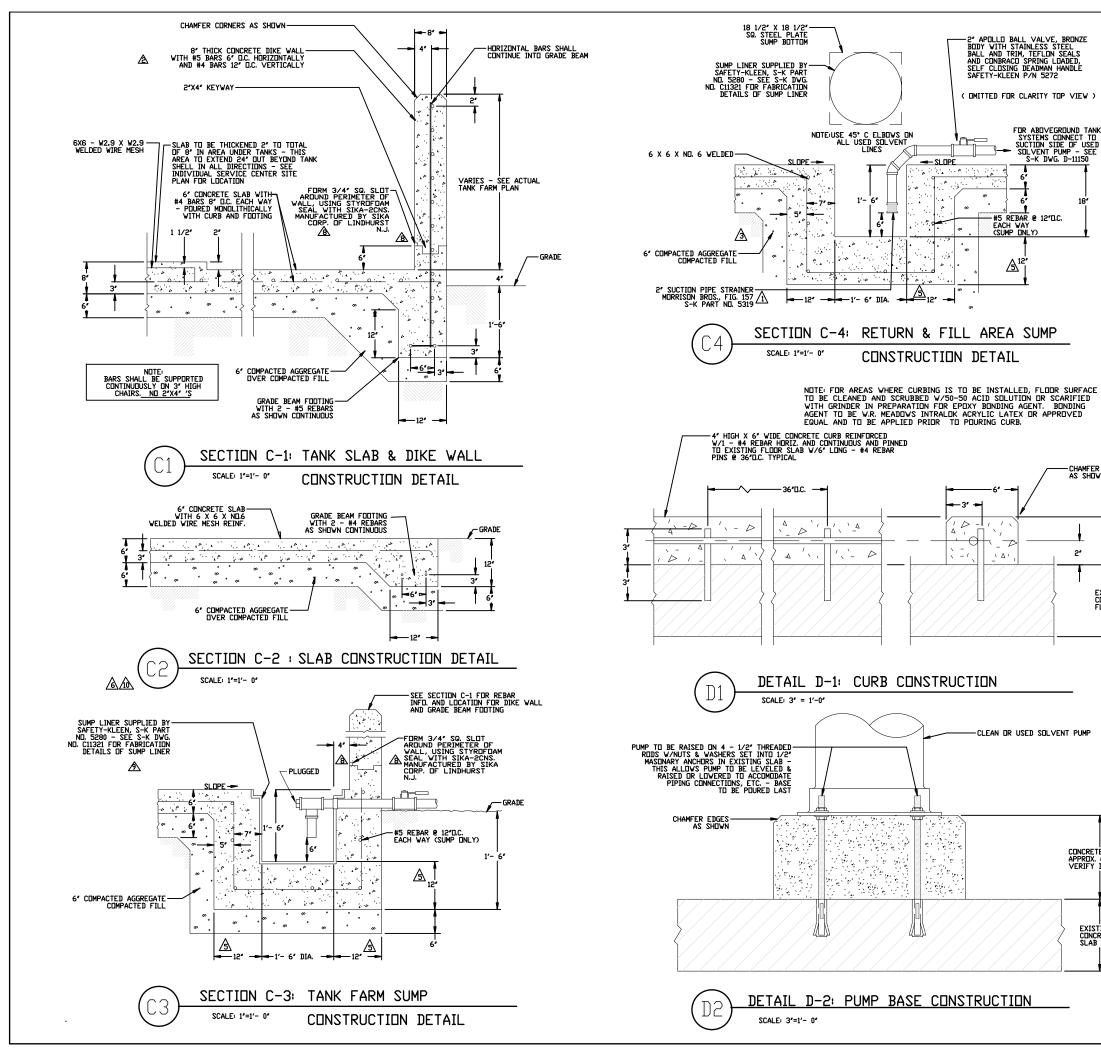
						TITLE
В	REVISED FOR TULSA SITE	JEK	AG	AG	091311	Œ
0	INCORPORATED REVIEW COMMENTS	RD	KJM		102193	
A	ISSUED FOR REVIEW	RD	КЈМ		062393	SCALE AS S
NO.	DESCRIPTION	BY	СНК	APPR	DATE	STAND
	REVISIONS				$\neg$	

USED MINERAL SPIRITS HORIZONTAL TANK PIPING ELEVATIONS AND DETAILS

SAFETY-KLEEN SYSTEMS, INC. 42 LONGWATER OR. NORWELL, MA. 02061 PHONE 800-669-5740

SCALE AS SHOWN	BY R.D.	CHKD KJM	APPROVED	OPERATIONS	DATE 10/21/93
STANDARD TYPE			STD-DWG NUM	BER	REV. NO.
MECHANICAL		BSD-	-303	В	

### Exhibit E-6 Tank Farm Concrete Construction Details



#### GENERAL NOTES

- THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORP, ANY REPRODUCTION DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITING
- THIS DRAWING SUPERCEDES SAFETY-KLEEN DRAWINGS C10240, C10962, D10507, AND D10955
- 3 SEE INDIVIDUAL SERVICE CENTER PLANS FOR LOCATIONS OF THESE DETAILS
- CONCRETE TO OBTAIN 3,000 PSI STRENGTH IN 28 DAYS
- ALL ITEMS WITH SAFETY-KLEEN PART NO. REFERENCES WILL BE SUPPLIED TO CONTRACTOR.
- ALL CONCRETE WORK SHALL CONFORM TO THE REQUIREMENTS OF ACI-301-84 "SPECIFICATIONS FOR STRUCTURAL CONCRETE FOR BUILDINGS'ALL CONCRETE SHALL HAVE FC=3,000 PSI. ALL CONCRETE EXPOSED TO WEATHER SHALL HAVE 5-7% AIR ENTRAINMENT. COARSE AGGREGATE SHALL CONFORM TO NO. 57 IN ACCORDANCE WITH ASTM C-33.
- ALL CONCRETE AREA'S TO BE COVERED WITH BURLAP AND KEPT CONTINUOUSLY MOIST FOR A MINIMUM PERIOD OF THREE DAYS IMMEADIATLY AFTER PLACEMENT & FINISHING.
- SLOPE ALL CONCRETE SLABS TO SUMP AS SHOWN ON PLAN.(RAISED SLAB UNDER TANKS TO BE LEVEL).

-CHAMFER CORNERS AS SHOWN

EXISTING CONCRETE FLOOR SLAB

EXISTING CONCRETE SLAB

REMOVED DRAIN PLUGISHOWED CORRECTED VERSION OF SUMP GRATING SUPPORT

DESCRIPTION

RD

BY CHKD APPR DATE

2"

- (9) ALL FOOTINGS SHALL BEAR ON UNDISTURBED SOIL OR COMPACTED FILL. MINIMUM SOIL BEARING PRESSURE TO BE 2,500 PSF.
- SUMPS TO BE TESTED BY CONTRACTOR WITH WATER AT FULL HEIGHT FOR A PERIOD OF 24 HOURS, WITH NO LEAKAGE ALLOWED.
- ALL FLOORS AND SUMPS SHALL BE COATED WITH TWO COATS OF SIKAGARD 62, MANFACTURED BY SIKA CORP. LYNDHURST.N.J. OR CONCRESIVE 1305, MANUFACTURED BY ADHESIVE ENGINEERING CO. SAN CARLOS.CA. COATING SHALL HAVE A SLIP-RESISTANT FINISH PER MANUFACTURER'S SPECIFICATIONS. MANUFACTURER'S RECOMMENDATIONS FOR SUFFACE PREPARATION AND APPLICATION SHALL BE STRICTLY FOLLOWED. ALLOW CONCRETE SUBSTRATE TO CURE AT LEAST 30 DAYS PRIOR TO APPLICATION OF COATING.

#### PROPRIETARY STATEMENT

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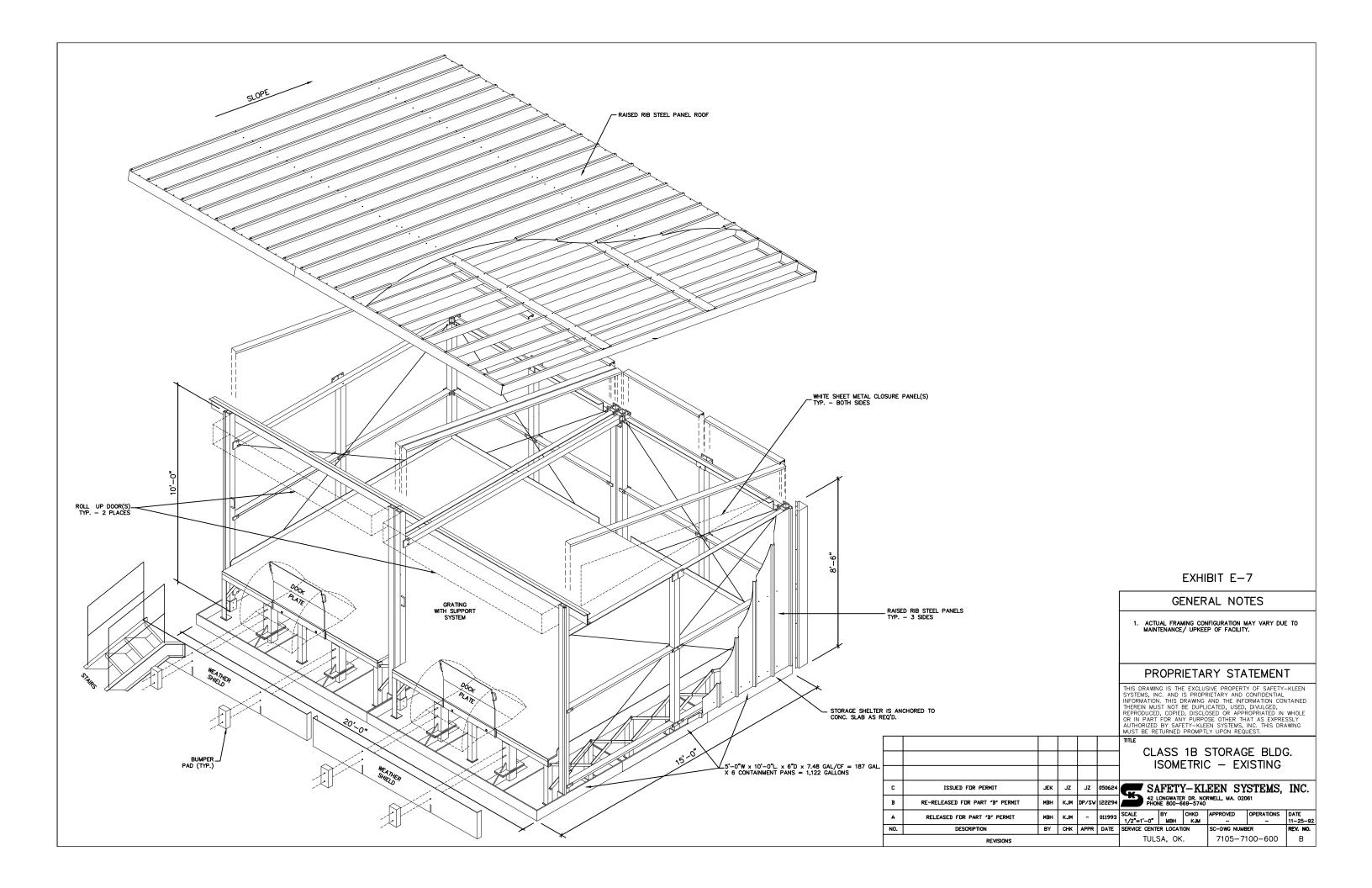
RMV,D. MESH FROM SECT. C3	RD			4\14\89
ADDED 3/4" SLOT & LABEL C-1 & C-3	BD			3/7/89
REVISED SECTION C-1	RD			7/6/88
ADDED COUPLING NOTE	RD			3/29/88
THICKENED CONC. IN SUMP SECT./S C-3 & C-4	RD			2/22/88
RMV'D 2' DRAIN LINE & BALL VALVE/S	RD			5/18/87
RMV'D U.G. DRAIN LINE FROM SUMP DET. C-4	RD			8/6/86
VERT. BAR SPACING WAS 48"	₩LJ			10/26/84
ADDED NOTE 5 & PIPE STRAINER	٧L			10/23/84
DESCRIPTION	BY	CHKD	APPR	DATE
	REVISED SECTION C-1 ADDED COUPLING NOTE THICKENED CONC. IN SUMP SECT.'S C-3 & C-4 RMV'D 2' DRAIN LINE & BALL VALVE/S RMV'D U.S. BRAIN LINE FROM SUMP BET. C-4 VERT. BAR SPACING WAS 48' ADDED NOTE 5 & PIPE STRAINER	REVISED SECTION C-1 RD ADDED COUPLING NOTE RD THICKENED CONC. IN SUMP SECT.'S C-3 & C-4 RD RMV'D 2' DRAIN LINE & BALL VALVE/S RD RMV'D W.G. BRAIN LINE FROM SUMP BET. C-4 RD VERT. BAR SPACING WAS 48' WLJ ADDED NOTE 5 & PIPE STRAINER WLJ	REVISED SECTION C-1 RD  ADDED COUPLING NOTE RD  THICKENED CONC. IN SUMP SECT.'S C-3 & C-4 RD  RMV'D 2' DRAIN LINE & BALL VALVE/S RD  RMV'D LUG. BRAIN LINE FROM SUMP DET. C-4 RD  VERT. BAR SPACING WAS 48' WLJ  ADDED NOTE 5 & PIPE STRAINER WLJ	REVISED SECTION C-1 RD  ADDED COUPLING NOTE RD  THICKENED CONC. IN SUMP SECT.'S C-3 & C-4 RD  RMV'D 2' DRAIN LINE & BALL VALVE'S RD  RMV'D UG. DRAIN LINE FROM SUMP DET. C-4 RD  VERT. BAR SPACING WAS 48' WLJ  ADDED NOTE 5 & PIPE STRAINER WLJ

TYPICAL CONCRETE CONSTRUCTION DETAILS

SAFETY-KLEEN SYSTEMS, INC. 42 LONGWATER DR. NORWELL, MA. 02061 PHONE 800-689-5740 ADDED NOTES 6 THRU 12 RD

SCALE DRAWN DATE
AS SHOWN NWD-PBG 12/16/83 TULSA, □K. 7105-9900-500 K

# Exhibit E-7 Metal Flammable Shelter



# Exhibit E-8 Example Inspection Log Sheets



#### CO CSA Inspection

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO CSA Inspection Instructions	
Note condition of inspection items. If item does need findings must be explained below. Include any required or performed.	
CO CSA Inspection Items	
Container Placement and Stacking - Check for evidence of failure (e.g., containers on pallets, pallets too high, unstable, other).	
Sealing of Containers - Check for evidence of failure (e.g., containers not closed or sealed, open).	
Labeling of Containers - Check for evidence of failure (e.g., no label, improper label, content, other).	
Container Integrity - Check for evidence of failure (e.g., condition, bulging, leaks, rust, corrosion, other). Containers do not have waste/staining on the outside which would require cleaning or overpacking.	
Pallets - Check for evidence of failure (e.g., broken, loose, condition).	
Doors - Check for evidence of failure (e.g., indoor area, broken or not working as intended).	
Base/ Foundation/ Roof - Check for evidence of failure (e.g., cracked, gaps, other).	
Berms/ Racks - Check for evidence of failure (e.g., cracks, gaps, broken, other).	

Site Generated Waste - debris, used absorbents, used PPE, aerosols, etc Check for evidence of failure (e.g., waste not containerized, proper storage location, container type, container label, other).	
Exit Signs - Check for evidence of failure (e.g. missing, lamps, battery backup, other).	
Aisle Space - Check for evidence of failure (e.g., minimum 2 ft required, other).	
Containment Area - Check for evidence of failure (e.g., secondary containment, curbing, floor, cracks, deterioration, ponding or wet spots, other).	
Sumps - Check for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, other).	
Loading/ Unloading Areas - Check condition of area (e.g., no free liquid, ponding or wet spots, available spill equipment, spill equipment location, spill kit supply and inventory is adequate, containment deterioration, leaks, pad condition, valve access box, housekeeping, other).	
Communication and Alarm System - Check for evidence of failure (e.g., test function, siren, strobe, other).	
Storage Capacity - Check for acceptable limit (e.g., area or permit restrictions, type restriction, volume limit, other).	
Bonding and Grounding - Check for evidence of failure (e.g., loose, broken, corrosion or deterioration, other).	
Pumps - Check for evidence of failure (e.g., deterioration or broken, leaks, other).	
Inventory Age - Check for acceptable limit (e.g., within area limits, permit restrictions, other).	
Satellite Accumulation Containers - Check for evidence of failure (e.g., container open, >55	

gallons, label, other).	
Spill Equipment - Check that spill equipment is available, clean, and ready for use. Spill equipment is placed in the correct location. Spill equipment includes the correct types of	
equipment in sufficient quantities.	
Additional Comments or Notes	
Comments	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



#### CO CSA Inspection

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO CSA Inspection Instructions	
Note condition of inspection items. If item does need findings must be explained below. Include any required or performed.	
CO CSA Inspection Items	
Container Placement and Stacking - Check for evidence of failure (e.g., containers on pallets, pallets too high, unstable, other).	
Sealing of Containers - Check for evidence of failure (e.g., containers not closed or sealed, open).	
Labeling of Containers - Check for evidence of failure (e.g., no label, improper label, content, other).	
Container Integrity - Check for evidence of failure (e.g., condition, bulging, leaks, rust, corrosion, other). Containers do not have waste/staining on the outside which would require cleaning or overpacking.	
Pallets - Check for evidence of failure (e.g., broken, loose, condition).	
Doors - Check for evidence of failure (e.g., indoor area, broken or not working as intended).	
Base/ Foundation/ Roof - Check for evidence of failure (e.g., cracked, gaps, other).	
Berms/ Racks - Check for evidence of failure (e.g., cracks, gaps, broken, other).	

Site Generated Waste - debris, used absorbents, used PPE, aerosols, etc Check for evidence of failure (e.g., waste not containerized, proper storage location, container type, container label, other).	
Exit Signs - Check for evidence of failure (e.g. missing, lamps, battery backup, other).	
Aisle Space - Check for evidence of failure (e.g., minimum 2 ft required, other).	
Containment Area - Check for evidence of failure (e.g., secondary containment, curbing, floor, cracks, deterioration, ponding or wet spots, other).	
Sumps - Check for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, other).	
Loading/ Unloading Areas - Check condition of area (e.g., no free liquid, ponding or wet spots, available spill equipment, spill equipment location, spill kit supply and inventory is adequate, containment deterioration, leaks, pad condition, valve access box, housekeeping, other).	
Communication and Alarm System - Check for evidence of failure (e.g., test function, siren, strobe, other).	
Storage Capacity - Check for acceptable limit (e.g., area or permit restrictions, type restriction, volume limit, other).	
Bonding and Grounding - Check for evidence of failure (e.g., loose, broken, corrosion or deterioration, other).	
Pumps - Check for evidence of failure (e.g., deterioration or broken, leaks, other).	
Inventory Age - Check for acceptable limit (e.g., within area limits, permit restrictions, other).	
Satellite Accumulation Containers - Check for evidence of failure (e.g., container open, >55	

gallons, label, other).	
Spill Equipment - Check that spill equipment is available, clean, and ready for use. Spill equipment is placed in the correct location. Spill equipment includes the correct types of	
equipment in sufficient quantities.	
Additional Comments or Notes	
Comments	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



#### CO Tank Systems Inspection

Compliance Header		
Inspector Name		
Area of Inspection		
Inspection Date and Time		
CO Tank Systems Inspection Instructions		
Note condition of inspection items. If item does need findings must be explained below. Include any required or performed.		
CO Tank Systems Inspection Items		
Tanks - Check for evidence of failure (e.g., leaks, rusty or loose anchoring, distortion, cleanliness, paint failure, other). Insulation - check for any damage or deterioration that may allow moisture intrusion.		
Pipes/Piping Supports - Check for evidence of failure (e.g., leaks, distortion, corrosion, paint failure, other).		
Valves - Check for evidence of failure (e.g., disconnected, corrosion, sticking, leaks, other).		
Fittings/Hose Connections - Check for evidence of failure (e.g., leaks, loose, disconnected, corrosion, other).		
Liquid Level - Check for acceptable level and level gauges working correctly. (e.g., high level max, permitted volume, level gauge legible, other).		
Secondary Containment - Check for interior and exterior for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, corrosion, erosion, other and excess liquid or debris, fire hazards, or other issues).		
Dike drain valves - Are valves closed and in		

good working condition?	
good working condition?  For double-wall tanks is interstitial monitoring equipment in good working condition and is the	
interstitial space free of liquid?	
Sumps - Check for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, other).	
Bonding and Grounding - Check for evidence of failure (e.g., loose, broken, corrosion or deterioration, other).	
Transfer Equipment/Pump and Pump Motors - Check for availability and condition (e.g., pumps, filters, strainers, hoses, leaks, overheating, other).	
Communication and Alarm System - Check for evidence of failure (e.g., test function, siren, strobe, other).	
Satellite Accumulation Containers - Check for evidence of failure (e.g., container open, >55 gallons, label, other).	
Manways, Hatches, Nipples, Other Openings, Ladders - Check for evidence of failure (e.g., leaks, condition, corrosion, closure, other).	
Pressure Relief Valves (PRV)/ Flame Arrestors - Check for evidence of failure (e.g., condition, corrosion, other).	
Tanks marked with the words "Hazardous Waste" or "Used Oil" - Check for appropriate markings.	
Tanks not used marked as "Out of Service" - Check for appropriate markings.	
Tanks marked as to the contents - Check for appropriate markings (e.g., "Used Oil", "Non-Haz Only").	
Monitoring Equipment/Level Indicators/Overfill Prevention Equipment - Check that equipment is in good working condition or for evidence of failure (e.g., actuate equipment/alarms to	

confirm operation, pressure and temperature gauges, level indicators, sticking, condensation, disconnected, other).  Loading/ Unloading Areas - Check condition of area (e.g., no free liquid, ponding or wet spots, available spill equipment, spill equipment location, spill kit supply and inventory is adequate, containment deterioration, leaks, pad condition, valve access box, housekeeping, other).  Tank System Safety - Is the system free of any
area (e.g., no free liquid, ponding or wet spots, available spill equipment, spill equipment location, spill kit supply and inventory is adequate, containment deterioration, leaks, pad condition, valve access box, housekeeping, other).  Tank System Safety - Is the system free of any
conditions that need to be addressed for continued safe operation?
Connection Box/Drip Trays and Buckets - Are the connection box and all drip trays and buckets free of liquids or saturated absorbents, and all material properly collected and disposed?
Site Generated Waste - debris, used absorbents, used PPE, aerosols, etc Check for evidence of failure (waste not containerized, proper storage location, container type, container label, other).
Spill Equipment - Check that spill equipment is available, at the correct location, equipment supply and inventory is adequate, equipment is in good condition clean and ready for use.
Ladders/platforms/walkways/egress pathways on or within tank or containment - Check for evidence of damage, corrosions, proper opration, pathways clear, doors/gates operable.
Compliance Footer
Inspector Signature
Attach Photo
Inspection Overall Assessment



#### CO Return and Fill Area

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Return and Fill Area Instructions	
Note condition of inspection items. If item does r findings must be explained. Include any repairs of	
CO Return and Fill Area Inspection Items	
Pump Seals - Check for evidence of failure (e.g., leaks, other).	
Pump Motors - Check for evidence of failure (e.g., overheating, other).	
Fittings - Check for evidence of failure (e.g., leaks, other).	
Valves - Check for evidence of failure (e.g., leaks, sticking, other).	
Hose Connections and Fittings - Check for evidence of failure (e.g., cracked, loose, leaks, sticking, other).	
Hose Body - Check for evidence of failure (e.g., crushed, cracked, thin spots, leaks, other).	
Clam Shell Unit Type - Lid Fusible Link - Check for evidence of failure (e.g., broken, spring missing, other).	
Clam Shell Unit Type - Lid Hinge Assembly - Check for evidence of failure (e.g., broken pivot arm, damaged lid arm, missing pins, other).	
Sliding Lid Unit Type - Gaskets - Check for evidence of failure (e.g., broken, cracked distorted, other).	
Sliding Lid Unit Type - Lid/ Slide Assembly -	



# CO Safety Security Inspection

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Safety Security Inspection Instructions	
Note condition of inspection items. If item does need findings must be explained below. Include any represented or performed.	
CO Safety Security Inspection Items	
Perimeter fences - check for evidence of failure (e.g., broken ties, corrosion, holes, distortion, other)	
Gates/External Warehouse Doors - Check for evidence of failure (e.g., locking mechanism, broken ties, corrosion, holes, distortion, direct access doors working properly, other).	
Warning signs - check for evidence of failure (e.g. missing, faded, other).	
Exit Signs - Check for evidence of failure (e.g., missing sign, illumination, lamp bulbs, battery backup, other).	
Exits/Firelanes/Evacuation Routes - Check that all routes are clear or unobstucted.	
Lighting System - Check for evidence of failure (e.g. expired lamps, effectiveness, location, other).	
Emergency Lighting System - Check for evidence of failure (e.g., expired lamps, battery backup, effectiveness, other).	
Accessibility of Safety Equipment/Protective Gear - Check for evidence of availability (e.g.,	

hardhats, faceshields, goggles, safety glasses, boots, gloves, aprons, uniforms, duct tape, absorbents, other).	
Adequate Supply of Safety Equipment/Protective Gear - Check for evidence of availability (e.g., cleanliness, inventory available is adequate, in the correct location, correct type of equipment, other).	
Condition of Safety Equipment - Check for evidence of failure (e.g., review PPE for damage or excessive wear, other).	
Breathing Apparatus Accessibility - Check for evidence of availability (e.g. SCBA respirators, equipment, other).	
Breathing Apparatus Adequate Supply/Full Charge - Check for evidence of availability (e.g., SCBA tanks, charged, other).	
Breathing Apparatus Condition - Check for evidence of failure (e.g., SCBA damage, other).	
First Aid Kits - Check for evidence of availability (e.g., adequate inventory, correct location, other).	
Bloodborne Pathogen Kits - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Emergency Eyewashes - Check for evidence of failure (e.g., disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, correct location, adequate type and inventory, other).	
Emergency Showers - Check for evidence of failure (e.g., disconnected or malfunctioning valves, inadequate pressure, inaccessible, leaking, correct location, adequate type, adequate inventory, other).	
Internal/External Communication - Check for evidence of failure (e.g., inadequate supply of phones or radios, malfunctioning intercom,	

telephones not working properly, emergency alarm does not work, phone moved from proper location, other).	
Fire Extinguishers - Check for evidence of failure (e.g., overdue inspection, correct location, correct type, not charged, inaccessible, adequate inventory, other).	
Absorbent Supply - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Recovery Drum Supply - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Respirators and Cartridges - Check for evidence of availability (e.g., adequate APR inventory, correct location, correct type, other).	
Fire Suppression System Accessibility - Check for evidence of failure (e.g., monitors, pull stations, alarms, other).	
Fire Suppression System Operable - Check for evidence of failure (e.g., test, other).	
Water Lines/Hydrants - Check for evidence of failure (e.g., blocked, broken, other).	
Alarm Systems - Check for evidence of failure (e.g., test, other).	
Fire Blankets - Check for evidence of availability (e.g., adequate inventory, correct location, other).	
Strainer on Fire Suppression System - Check for evidence of failure (e.g., functioning as intended, other).	
Surveillance System/Guard Service - Check for evidence of failure (e.g., equipment or service provided and functioning properly, other).	
Supplied Air Delivery System and Reserve - Check for evidence of failure (e.g., system operational, epuipment functioning, other).	

Decontamination Equipment/Spill Clean-up Equipment - Check for evidence of availability (e.g., adequate supply of shovels, mops, cleaning solvents, available inventory, correct location, correct type, other).	
Portable Sump Pumps - Check for evidence of availability (e.g., adequate inventory, functioning properly, correct location, correct type, other).	
Gasoline Pumps - Check for evidence of failure (e.g., broken parts, leaks, other).	
Loud Speakers - Check for evidence of failure (e.g., test, other).	
Chocked Wheels on Parked Vehicles - Check for evidence of failure (e.g., chocks not used, missing, deteriorated, other).	
Cylinders Secure - Check for evidence of failure (e.g., properly stored, secured, chained, other).	
Ventilation Operable - Check for evidence of failure (e.g., system working as intended, other).	
Fall Protection - Check for evidence of availability (e.g., adequate inventory, integrity of equipment, other).	
Electrical Boxes - Check for evidence of failure (e.g., closed, not blocked, marked properly, other).	
Emergency Contact Info Posted - Check for evidence of availability (e.g., up-to-date postings, location requirement, other).	
Hearing Protection Available - Check for evidence of availability (e.g., type appropriate per location, other).	
Housekeeping - Check for evidence of failure (e.g., blocked egress, proper storage, procedure followed, other).	
Portable Compressor - Check for evidence of availability (e.g., adequate inventory,	

functioning properly, other).	
Lime Supply - Check for evidence of availability (e.g., adequate inventory, other).	
QC Lab Hood - Check for evidence of failure (e.g., functioning properly, other).	
Rolloff Parking Area - Check for evidence of failure (e.g., housekeeping, staging, other).	
Dumpster/Outside Containers - Check for evidence of failure (e.g., housekeeping, condition, appropriate use and storage, other)	
Stormwater Collection System - Check for evidence of failure (e.g., functioning properly, damaged equipment, integrity, other).	
Rally Point - Check for evidence of failure (e.g., location identified, communication, other).	
Visitor Log - Check for evidence of failure (e.g., available, communication, proper use, other).	
Contingency Plan - Check for evidence of failure (e.g., available, up-to-date, communication, other).	
Wind Instrument/Wind Sock - Check for evidence of failure (e.g., operational, functioning properly, not broken, other).	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



### CO Return and Fill Area

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Return and Fill Area Instructions	
Note condition of inspection items. If item does number findings must be explained. Include any repairs of	
CO Return and Fill Area Inspection Items	
Pump Seals - Check for evidence of failure (e.g., leaks, other).	
Pump Motors - Check for evidence of failure (e.g., overheating, other).	
Fittings - Check for evidence of failure (e.g., leaks, other).	
Valves - Check for evidence of failure (e.g., leaks, sticking, other).	
Hose Connections and Fittings - Check for evidence of failure (e.g., cracked, loose, leaks, sticking, other).	
Hose Body - Check for evidence of failure (e.g., crushed, cracked, thin spots, leaks, other).	
Clam Shell Unit Type - Lid Fusible Link - Check for evidence of failure (e.g., broken, spring missing, other).	
Clam Shell Unit Type - Lid Hinge Assembly - Check for evidence of failure (e.g., broken pivot arm, damaged lid arm, missing pins, other).	
Sliding Lid Unit Type - Gaskets - Check for evidence of failure (e.g., broken, cracked distorted, other).	
Sliding Lid Unit Type - Lid/ Slide Assembly -	



# CO Tank Systems Inspection

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Tank Systems Inspection Instructions	
Note condition of inspection items. If item does need findings must be explained below. Include any required or performed.	
CO Tank Systems Inspection Items	
Tanks - Check for evidence of failure (e.g., leaks, rusty or loose anchoring, distortion, cleanliness, paint failure, other). Insulation - check for any damage or deterioration that may allow moisture intrusion.	
Pipes/Piping Supports - Check for evidence of failure (e.g., leaks, distortion, corrosion, paint failure, other).	
Valves - Check for evidence of failure (e.g., disconnected, corrosion, sticking, leaks, other).	
Fittings/Hose Connections - Check for evidence of failure (e.g., leaks, loose, disconnected, corrosion, other).	
Liquid Level - Check for acceptable level and level gauges working correctly. (e.g., high level max, permitted volume, level gauge legible, other).	
Secondary Containment - Check for interior and exterior for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, corrosion, erosion, other and excess liquid or debris, fire hazards, or other issues).	
Dike drain valves - Are valves closed and in	

good working condition?	
good working condition?  For double-wall tanks is interstitial monitoring equipment in good working condition and is the	
interstitial space free of liquid?	
Sumps - Check for evidence of failure (e.g., cracks, ponding or wet spots, pitting or deterioration, other).	
Bonding and Grounding - Check for evidence of failure (e.g., loose, broken, corrosion or deterioration, other).	
Transfer Equipment/Pump and Pump Motors - Check for availability and condition (e.g., pumps, filters, strainers, hoses, leaks, overheating, other).	
Communication and Alarm System - Check for evidence of failure (e.g., test function, siren, strobe, other).	
Satellite Accumulation Containers - Check for evidence of failure (e.g., container open, >55 gallons, label, other).	
Manways, Hatches, Nipples, Other Openings, Ladders - Check for evidence of failure (e.g., leaks, condition, corrosion, closure, other).	
Pressure Relief Valves (PRV)/ Flame Arrestors - Check for evidence of failure (e.g., condition, corrosion, other).	
Tanks marked with the words "Hazardous Waste" or "Used Oil" - Check for appropriate markings.	
Tanks not used marked as "Out of Service" - Check for appropriate markings.	
Tanks marked as to the contents - Check for appropriate markings (e.g., "Used Oil", "Non-Haz Only").	
Monitoring Equipment/Level Indicators/Overfill Prevention Equipment - Check that equipment is in good working condition or for evidence of failure (e.g., actuate equipment/alarms to	

confirm operation, pressure and temperature gauges, level indicators, sticking, condensation, disconnected, other).  Loading/ Unloading Areas - Check condition of area (e.g., no free liquid, ponding or wet spots, available spill equipment, spill equipment location, spill kit supply and inventory is adequate, containment deterioration, leaks, pad condition, valve access box, housekeeping, other).  Tank System Safety - Is the system free of any conditions that need to be addressed for
area (e.g., no free liquid, ponding or wet spots, available spill equipment, spill equipment location, spill kit supply and inventory is adequate, containment deterioration, leaks, pad condition, valve access box, housekeeping, other).  Tank System Safety - Is the system free of any
continued safe operation?
Connection Box/Drip Trays and Buckets - Are the connection box and all drip trays and buckets free of liquids or saturated absorbents, and all material properly collected and disposed?
Site Generated Waste - debris, used absorbents, used PPE, aerosols, etc Check for evidence of failure (waste not containerized, proper storage location, container type, container label, other).
Spill Equipment - Check that spill equipment is available, at the correct location, equipment supply and inventory is adequate, equipment is in good condition clean and ready for use.
Ladders/platforms/walkways/egress pathways on or within tank or containment - Check for evidence of damage, corrosions, proper opration, pathways clear, doors/gates operable.
Compliance Footer
Inspector Signature
Attach Photo
Inspection Overall Assessment



# CO Safety Security Inspection

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Safety Security Inspection Instructions	
Note condition of inspection items. If item does need findings must be explained below. Include any represented or performed.	
CO Safety Security Inspection Items	
Perimeter fences - check for evidence of failure (e.g., broken ties, corrosion, holes, distortion, other)	
Gates/External Warehouse Doors - Check for evidence of failure (e.g., locking mechanism, broken ties, corrosion, holes, distortion, direct access doors working properly, other).	
Warning signs - check for evidence of failure (e.g. missing, faded, other).	
Exit Signs - Check for evidence of failure (e.g., missing sign, illumination, lamp bulbs, battery backup, other).	
Exits/Firelanes/Evacuation Routes - Check that all routes are clear or unobstucted.	
Lighting System - Check for evidence of failure (e.g. expired lamps, effectiveness, location, other).	
Emergency Lighting System - Check for evidence of failure (e.g., expired lamps, battery backup, effectiveness, other).	
Accessibility of Safety Equipment/Protective Gear - Check for evidence of availability (e.g.,	

hardhats, faceshields, goggles, safety glasses, boots, gloves, aprons, uniforms, duct tape, absorbents, other).	
Adequate Supply of Safety Equipment/Protective Gear - Check for evidence of availability (e.g., cleanliness, inventory available is adequate, in the correct location, correct type of equipment, other).	
Condition of Safety Equipment - Check for evidence of failure (e.g., review PPE for damage or excessive wear, other).	
Breathing Apparatus Accessibility - Check for evidence of availability (e.g. SCBA respirators, equipment, other).	
Breathing Apparatus Adequate Supply/Full Charge - Check for evidence of availability (e.g., SCBA tanks, charged, other).	
Breathing Apparatus Condition - Check for evidence of failure (e.g., SCBA damage, other).	
First Aid Kits - Check for evidence of availability (e.g., adequate inventory, correct location, other).	
Bloodborne Pathogen Kits - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Emergency Eyewashes - Check for evidence of failure (e.g., disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, correct location, adequate type and inventory, other).	
Emergency Showers - Check for evidence of failure (e.g., disconnected or malfunctioning valves, inadequate pressure, inaccessible, leaking, correct location, adequate type, adequate inventory, other).	
Internal/External Communication - Check for evidence of failure (e.g., inadequate supply of phones or radios, malfunctioning intercom,	

telephones not working properly, emergency alarm does not work, phone moved from proper location, other).	
Fire Extinguishers - Check for evidence of failure (e.g., overdue inspection, correct location, correct type, not charged, inaccessible, adequate inventory, other).	
Absorbent Supply - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Recovery Drum Supply - Check for evidence of availability (e.g., adequate inventory, correct location, correct type, other).	
Respirators and Cartridges - Check for evidence of availability (e.g., adequate APR inventory, correct location, correct type, other).	
Fire Suppression System Accessibility - Check for evidence of failure (e.g., monitors, pull stations, alarms, other).	
Fire Suppression System Operable - Check for evidence of failure (e.g., test, other).	
Water Lines/Hydrants - Check for evidence of failure (e.g., blocked, broken, other).	
Alarm Systems - Check for evidence of failure (e.g., test, other).	
Fire Blankets - Check for evidence of availability (e.g., adequate inventory, correct location, other).	
Strainer on Fire Suppression System - Check for evidence of failure (e.g., functioning as intended, other).	
Surveillance System/Guard Service - Check for evidence of failure (e.g., equipment or service provided and functioning properly, other).	
Supplied Air Delivery System and Reserve - Check for evidence of failure (e.g., system operational, epuipment functioning, other).	

Decontamination Equipment/Spill Clean-up Equipment - Check for evidence of availability (e.g., adequate supply of shovels, mops, cleaning solvents, available inventory, correct location, correct type, other).	
Portable Sump Pumps - Check for evidence of availability (e.g., adequate inventory, functioning properly, correct location, correct type, other).	
Gasoline Pumps - Check for evidence of failure (e.g., broken parts, leaks, other).	
Loud Speakers - Check for evidence of failure (e.g., test, other).	
Chocked Wheels on Parked Vehicles - Check for evidence of failure (e.g., chocks not used, missing, deteriorated, other).	
Cylinders Secure - Check for evidence of failure (e.g., properly stored, secured, chained, other).	
Ventilation Operable - Check for evidence of failure (e.g., system working as intended, other).	
Fall Protection - Check for evidence of availability (e.g., adequate inventory, integrity of equipment, other).	
Electrical Boxes - Check for evidence of failure (e.g., closed, not blocked, marked properly, other).	
Emergency Contact Info Posted - Check for evidence of availability (e.g., up-to-date postings, location requirement, other).	
Hearing Protection Available - Check for evidence of availability (e.g., type appropriate per location, other).	
Housekeeping - Check for evidence of failure (e.g., blocked egress, proper storage, procedure followed, other).	
Portable Compressor - Check for evidence of availability (e.g., adequate inventory,	

functioning properly, other).	
Lime Supply - Check for evidence of availability (e.g., adequate inventory, other).	
QC Lab Hood - Check for evidence of failure (e.g., functioning properly, other).	
Rolloff Parking Area - Check for evidence of failure (e.g., housekeeping, staging, other).	
Dumpster/Outside Containers - Check for evidence of failure (e.g., housekeeping, condition, appropriate use and storage, other)	
Stormwater Collection System - Check for evidence of failure (e.g., functioning properly, damaged equipment, integrity, other).	
Rally Point - Check for evidence of failure (e.g., location identified, communication, other).	
Visitor Log - Check for evidence of failure (e.g., available, communication, proper use, other).	
Contingency Plan - Check for evidence of failure (e.g., available, up-to-date, communication, other).	
Wind Instrument/Wind Sock - Check for evidence of failure (e.g., operational, functioning properly, not broken, other).	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	

# Exhibit E-9 Tank Integrity Test

# Safety-Kleen Systems

Tulsa, OK

## **STI SP001 Formal Internal Inspection**

**T-2** 

Inspection Date: 6/24/2021



Tank Data							
Design Standard:	No data Available	Nominal Diameter:	8' 0"				
Build Date:	No data Available	Nominal Length:	21′ 5″				
Manufactured By:	No Data Available	Release Prevention Barrier:	Concrete				
Manufacturer's Serial No.:	No Data Available	Head Type:	Flat				
Material:	CS	Continuous Release Detection Method (CRDM):	Elevated				
Orientation:	Horizontal	Spill Control:	Dike/Berm				

#### **SUMMARY**

#### **Conclusion:**

As determined by the condition found during the inspection of tank# T-2, the tank appears to be in suitable condition at the time of this inspection.

#### Recommendations:

The cracks in the containment should be cleaned and sealed.



EXTERNAL VISUAL INSPECTION							
Foundation	General Condition						
Item	Acc	Fin	N/I	N/A	Comments		
Coating condition	$\boxtimes$						
Concrete condition		$\boxtimes$			Cracking		
Containment / Dike walls		$\boxtimes$			Cracking		
Elastomeric Liner				$\boxtimes$			
Site Drainage	$\boxtimes$						
Equipment Support					General Condition		
Item	Acc	Fin	N/I	N/A	Comments		
Base Support Type					Skids		
Coating	$\boxtimes$						
Concrete Pad	$\boxtimes$						
Corrosion				$\boxtimes$			
Fireproofing				$\boxtimes$			
Outer Shell					General Condition		
Item	Acc	Fin	N/I	N/A	Comments		
Attachments	$\boxtimes$						
Bottom Projection Plate				$\boxtimes$			
Coating Condition	$\boxtimes$						
Corrosion							
Deformation				$\boxtimes$			
Insulation				$\boxtimes$			
Insulation Support Bands				$\boxtimes$			
Lifting Lugs				$\boxtimes$			
Atmospheric Venting	$\boxtimes$						
Overfill Protection	$\boxtimes$						
Attached Piping	$\boxtimes$						
Repair(s)				$\boxtimes$			
Vegetation				$\boxtimes$			
Weather Jacket				$\boxtimes$			
Manways / Nozzles	Manways / Nozzles General Condition				General Condition		
Item	Acc	Fin	N/I	N/A	Comments		
Bolting Condition	$\boxtimes$						
Coating Condition	$\boxtimes$						
Corrosion				$\boxtimes$			
Flange Condition							
Reinforcement Pad Condition				$\boxtimes$			



EXTERNAL VISUAL INSPECTION CONTINUED							
Heads	General Condition						
Items	Acc	Fin	N/I	N/A	Comments		
Coating Condition	$\boxtimes$						
Corrosion				$\boxtimes$			
Insulation				$\boxtimes$			
Proper Drainage				$\boxtimes$			
Weather Jacket				$\boxtimes$			
Top Appurtenances					General Condition		
Items	Acc	Fin	N/I	N/A	Comments		
Bolting Condition	$\boxtimes$						
Condition of Hatch(s), Manway(s)	$\boxtimes$						
Condition of Pressure/Vacuum Vent(s)	$\boxtimes$						
Condition of Vent Screen(s)	$\boxtimes$						
Emergency Venting	$\boxtimes$						
Mixer / Agitator				$\boxtimes$			
Normal Venting	$\boxtimes$						
Appurtenances					General Condition		
Items	Acc	Fin	N/I	N/A	Comments		
Anchors				$\boxtimes$			
Gauges, Sight Glass (damage)				$\boxtimes$			
Grounding (tightness & corrosion)	$\boxtimes$						
Liquid Level Gauge	$\boxtimes$						
Data Plate				$\boxtimes$	Attached Not Legible		



INTERNAL VISUAL INSPECTION							
Shell	General Condition						
Item	Acc	Fin	N/I	N/A	Comments		
Annular Ring				$\boxtimes$			
Cleanliness	$\boxtimes$						
Corrosion/Pitting	$\boxtimes$						
Liner				$\boxtimes$			
Magnetic Flux Leakage Exam				$\boxtimes$			
Repair(s)							
Sump(s)				$\boxtimes$			
Vacuum Box Bubble Exam				$\boxtimes$			
Void(s), Low Spots				$\boxtimes$			
Floor to Shell Weld (MP only)				$\boxtimes$			
Heads					General Condition		
Item	Acc	Fin	N/I	N/A	Comments		
Liner				$\boxtimes$			
Corrosion / Pitting							
Nozzles, Man Ways and Attachments					General Condition		
Item	Acc	Fin	N/I	N/A	Comments		
Baffles				$\boxtimes$			
Corrosion/Pitting	$\boxtimes$						
Down comer(s)				$\boxtimes$			
Internal coils				$\boxtimes$			
Mixers, agitators				$\boxtimes$			
Thermowell(s)				$\boxtimes$			

### Thickness Data:

	0°	90°	180°	270°
First Course	0.257''	0.243''	0.259''	0.262''
	0.253''	0.240''	0.258''	0.263''
	0.253''	0.244''	0.256''	0.260''
<b>Second Course</b>	0.245''	0.225''	0.250''	0.244''
	0.246''	0.230''	0.250''	0.247''
	0.248''	0.229''	0.249''	0.248''
<b>Third Course</b>	0.273''	0.269''	0.279''	0.276''
	0.278''	0.255''	0.278''	0.281''
	0.274''	0.268''	0.273''	0.275''
	Course 1		Course 2	
	Minimum	0.240''	Minimum	0.225''
	Average	0.254''	Average	0.243''
	Maximum	0.263''	Maximum	0.250''
	Standard	0.008''	Standard	0.009''
	Deviation		Deviation	
		Course 3		
		Minimum	0.255''	
		Average	0.273"	
		Maximum	0.281''	
		Standard	0.007''	
		Deviation		
	Тор	Bottom	East	West
North Head	0.261''	0.261''	0.264''	0.264''
South Head	0.259''	0.262''	0.264''	0.264''
	12 o' clock	6 o' clock		
Manway	0.221"	0.228''	<del>-</del>	
iviaiivvay	0.221	0.220		

















#### **Inspection Certification Certificate**

Taylor Sudol (Certified Inspector) has performed a STI SP001 Formal Internal Inspection of Tank# 2. The tank is located at the Safety-Kleen facility in Tulsa, OK. As determined by the condition found during the inspection of tank# 1, the tank appears to be in suitable condition at the time of this inspection. Facility personnel should perform periodic inspections in accordance with STI SP001.

The services performed, documentation of inspection, identification of deterioration, and the generation of a report was performed within the generally accepted principles and practices of STI SP001 (current version), Clean Harbors' Written Practice and Inspection procedures.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment. My status as a Certified Inspector can be verified on the American Petroleum Institute and Steel Tank Institute websites at the below links.

Taylor Sudol
API 510#61515
API 570#71792
API 653#56977
STI SP001# AC44096

Designated Corporate Level III

API: http://inspectorsearch.api.org

STI: https://www.steeltank.com/SP001StandardFAQs/tabid/463/Default.aspx Within Question #9

#### **WARRANTY**

Clean Harbors Inspection Services, USA. ("Company") has performed inspection services on equipment designated by Choose an item. (owner/operator) and has evaluated its condition based on observations and measurements made by Company's inspectors. While our evaluation accurately describes the condition of the equipment at the time of inspection, the owner/operator must independently assess the inspection information/report provided by Company and any conclusions reached by owner/operator and any action taken or omitted to be taken are the sole responsibility of the owner/operator. With respect to inspection and testing, Company warrants only that the services have been performed in accordance with accepted industry practice. If any such services fail to meet the foregoing warranty, Company shall re-perform the service to the same extent and on the same conditions as the original service.

Company makes no warranty, express or implied, regarding goods or services provided by Company other than those warranties set forth herein. The preceding paragraph sets forth the exclusive remedy for claims based on failure or of defect in materials or services, whether such claim is made in contract or tort (including negligence) and however instituted, and, upon expiration of the warranty period, all such liability shall terminate. The foregoing warranty is exclusive and in lieu of all other warranties, whether written, oral, implied or statutory. NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE SHALL APPLY, nor shall Company be liable for any loss or damage whatsoever by reason of its failure to discover, report, repair or modify latent defects or defects inherent in the design of any equipment inspected. In no event, whether a result of breach of contract, warranty or tort (including negligence) shall Company be liable for any consequential or incidental damages including, but not limited to, loss of profit or revenues, loss of use of equipment tested or services by Company or any associated damage to facilities, down-time costs or claims of other damages.

# Safety-Kleen Systems

Tulsa, OK

## **STI SP001 Formal Internal Inspection**

**T-3** 

Inspection Date: 6/24/2021



		Tank Data	
Design Standard:	No data Available	Nominal Diameter:	8' 0"
Build Date:	No data Available	Nominal Length:	21′ 5″
Manufactured By:	No Data Available	Release Prevention Barrier:	Concrete
Manufacturer's Serial No.:	No Data Available	Head Type:	Flat
Material:	CS	Continuous Release Detection Method (CRDM):	Elevated
Orientation:	Horizontal	Spill Control:	Dike/Berm

#### **SUMMARY**

#### **Conclusion:**

As determined by the condition found during the inspection of tank# T-3, the tank appears to be in suitable condition at the time of this inspection.

#### Recommendations:

The cracks in the containment should be cleaned and sealed.



EXTERNAL VISUAL INSPECTION							
Foundation	General Condition						
Item	Acc	Fin	N/I	N/A	Comments		
Coating condition	$\boxtimes$						
Concrete condition		$\boxtimes$			Cracking		
Containment / Dike walls		$\boxtimes$			Cracking		
Elastomeric Liner				$\boxtimes$			
Site Drainage	$\boxtimes$						
Equipment Support					General Condition		
Item	Acc	Fin	N/I	N/A	Comments		
Base Support Type					Skids		
Coating	$\boxtimes$						
Concrete Pad	$\boxtimes$						
Corrosion				$\boxtimes$			
Fireproofing				$\boxtimes$			
Outer Shell					General Condition		
Item	Acc	Fin	N/I	N/A	Comments		
Attachments	$\boxtimes$						
Bottom Projection Plate				$\boxtimes$			
Coating Condition	$\boxtimes$						
Corrosion							
Deformation				$\boxtimes$			
Insulation				$\boxtimes$			
Insulation Support Bands				$\boxtimes$			
Lifting Lugs				$\boxtimes$			
Atmospheric Venting	$\boxtimes$						
Overfill Protection	$\boxtimes$						
Attached Piping	$\boxtimes$						
Repair(s)							
Vegetation				$\boxtimes$			
Weather Jacket				$\boxtimes$			
Manways / Nozzles	Manways / Nozzles General Condition				General Condition		
Item	Acc	Fin	N/I	N/A	Comments		
Bolting Condition	$\boxtimes$						
Coating Condition	$\boxtimes$						
Corrosion				$\boxtimes$			
Flange Condition							
Reinforcement Pad Condition				$\boxtimes$			



EXTERNAL VISUAL INSPECTION CONTINUED							
Heads	General Condition						
Items	Acc	Fin	N/I	N/A	Comments		
Coating Condition	$\boxtimes$						
Corrosion				$\boxtimes$			
Insulation				$\boxtimes$			
Proper Drainage				$\boxtimes$			
Weather Jacket				$\boxtimes$			
Top Appurtenances					General Condition		
Items	Acc	Fin	N/I	N/A	Comments		
Bolting Condition	$\boxtimes$						
Condition of Hatch(s), Manway(s)	$\boxtimes$						
Condition of Pressure/Vacuum Vent(s)	$\boxtimes$						
Condition of Vent Screen(s)	$\boxtimes$						
Emergency Venting	$\boxtimes$						
Mixer / Agitator				$\boxtimes$			
Normal Venting	$\boxtimes$						
Appurtenances					General Condition		
Items	Acc	Fin	N/I	N/A	Comments		
Anchors				$\boxtimes$			
Gauges, Sight Glass (damage)				$\boxtimes$			
Grounding (tightness & corrosion)	$\boxtimes$						
Liquid Level Gauge	$\boxtimes$						
Data Plate				$\boxtimes$	Attached Not Legible		

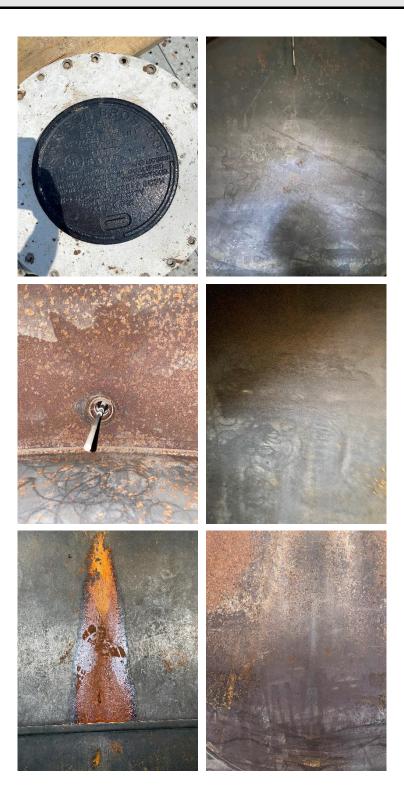


INTERNAL VISUAL INSPECTION								
Shell	General Condition							
Item	Acc	Fin	N/I	N/A	Comments			
Annular Ring				$\boxtimes$				
Cleanliness	$\boxtimes$							
Corrosion/Pitting	$\boxtimes$							
Liner				$\boxtimes$				
Magnetic Flux Leakage Exam				$\boxtimes$				
Repair(s)								
Sump(s)				$\boxtimes$				
Vacuum Box Bubble Exam				$\boxtimes$				
Void(s), Low Spots				$\boxtimes$				
Floor to Shell Weld (MP only)				$\boxtimes$				
Heads	General Condition							
Item	Acc	Fin	N/I	N/A	Comments			
Liner				$\boxtimes$				
Corrosion / Pitting								
Nozzles, Man Ways and Attachments	General Condition							
Item	Acc	Fin	N/I	N/A	Comments			
Baffles				$\boxtimes$				
Corrosion/Pitting	$\boxtimes$							
Down comer(s)				$\boxtimes$				
Internal coils				$\boxtimes$				
Mixers, agitators				$\boxtimes$				
Thermowell(s)				$\boxtimes$				

### Thickness Data:

	0°	90°	180°	270°
First Course	0.261''	0.262''	0.260''	0.259''
	0.259"	0.266''	0.263''	0.259''
	0.259''	0.266''	0.263''	0.258''
<b>Second Course</b>	0.250''	0.253''	0.250''	0.254''
	0.252"	0.254''	0.252"	0.257''
	0.249''	0.255''	0.253"	0.252''
<b>Third Course</b>	0.261''	0.260''	0.257''	0.261''
	0.267''	0.262''	0.261''	0.263''
	0.264''	0.261''	0.257''	0.260''
	Course 1		Course 2	
	Minimum	0.258''	Minimum	0.249''
	Average	0.261''	Average	0.253''
	Maximum	0.266''	Maximum	0.257''
	Standard	0.003"	Standard	0.002"
	Deviation	0.000	Deviation	0.002
		Course 3		
		Minimum	_ 0.257''	
		Average	0.261''	
		Maximum	0.267''	
	Standard	0.003''		
		Deviation	0.003	
	Тор	Bottom	East	West
North Head	0.257"	0.257''	0.258''	0.261"
South Head	0.259''	0.258''	0.256''	0.258''
	12 o' clock	6 o' clock	<u>-</u>	
Manway	0.224''	0.234''		





"People and Technology Creating a Better Environment"

#### Photographs



"People and Technology Creating a Better Environment"

#### **Inspection Certification Certificate**

Taylor Sudol (Certified Inspector) has performed a STI SP001 Formal Internal Inspection of Tank# 3. The tank is located at the Safety-Kleen facility in Tulsa, OK. As determined by the condition found during the inspection of tank# 3, the tank appears to be in suitable condition at the time of this inspection. Facility personnel should perform periodic inspections in accordance with STI SP001.

The services performed, documentation of inspection, identification of deterioration, and the generation of a report was performed within the generally accepted principles and practices of STI SP001 (current version), Clean Harbors' Written Practice and Inspection procedures.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment. My status as a Certified Inspector can be verified on the American Petroleum Institute and Steel Tank Institute websites at the below links.

Taylor Sudol
API 510# 61515
API 570# 71792
API 653# 56977
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Designated Corporate Level III

API: http://inspectorsearch.api.org

STI: https://www.steeltank.com/SP001StandardFAQs/tabid/463/Default.aspx Within Question #9

"People and Technology Creating a Better Environment"

#### **WARRANTY**

Clean Harbors Inspection Services, USA. ("Company") has performed inspection services on equipment designated by Choose an item. (owner/operator) and has evaluated its condition based on observations and measurements made by Company's inspectors. While our evaluation accurately describes the condition of the equipment at the time of inspection, the owner/operator must independently assess the inspection information/report provided by Company and any conclusions reached by owner/operator and any action taken or omitted to be taken are the sole responsibility of the owner/operator. With respect to inspection and testing, Company warrants only that the services have been performed in accordance with accepted industry practice. If any such services fail to meet the foregoing warranty, Company shall re-perform the service to the same extent and on the same conditions as the original service.

Company makes no warranty, express or implied, regarding goods or services provided by Company other than those warranties set forth herein. The preceding paragraph sets forth the exclusive remedy for claims based on failure or of defect in materials or services, whether such claim is made in contract or tort (including negligence) and however instituted, and, upon expiration of the warranty period, all such liability shall terminate. The foregoing warranty is exclusive and in lieu of all other warranties, whether written, oral, implied or statutory. NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE SHALL APPLY, nor shall Company be liable for any loss or damage whatsoever by reason of its failure to discover, report, repair or modify latent defects or defects inherent in the design of any equipment inspected. In no event, whether a result of breach of contract, warranty or tort (including negligence) shall Company be liable for any consequential or incidental damages including, but not limited to, loss of profit or revenues, loss of use of equipment tested or services by Company or any associated damage to facilities, down-time costs or claims of other damages.



# Integrity Assessment Used Solvent Storage System Tulsa, Oklahoma

Prepared for: Safety-Kleen Systems, Inc.

Date: 11.19.2009

Cameron-Cole, LLC

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

www.cameron-cole.com



#### TANK SYSTEM CERTIFICATION

I have supervised the integrity assessment dated November 19, 2009, of the Used Solvent Storage Tank System at the Safety-Kleen Systems, Inc. facility in Tulsa, Oklahoma. The EPA ID Number for this facility is OKD 000763821. This work is described in the attached Cameron-Cole, LLC report *Integrity Assessment Used Solvent Storage System, Tulsa, Oklahoma*, November 19, 2009. The report was performed to meet the requirements of Resource Conservation and Recovery Act (RCRA) regulations in 40 CFR 264.191, 40 CFR 264.193, and the corresponding requirements in the Oklahoma Department of Environmental Quality regulations OAC 252:205-3-2.

With regard to the above duty, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assume that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Wayne L. Frank
Registered Professional Engineer
Oklahoma PE Number 22414

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





#### TANK SYSTEM ASSESSMENT

This report documents the integrity assessment of the used solvent storage system at the Safety-Kleen Systems, Inc. facility in Tulsa, Oklahoma. The EPA ID number for this facility is OKD 000763821. This assessment and this report were prepared to meet the requirements of the Resource Conservation and Recovery Act (RCRA) regulations in 40 CFR 264.191, 40 CFR 264.193<sup>1</sup>, and the corresponding requirements in the Oklahoma Department of Environmental Quality regulations, OAC 252:205-3-2<sup>2</sup>. The tank thickness evaluation is based on guidance in Underwriters Laboratories document UL 142 Steel Aboveground Tanks for Flammable and Combustible Liquids.

#### SYSTEM DISCRIPTION

Used mineral spirits solvent material is poured from containers into one of two open-top, aboveground, steel solvent-return receptacles, which also serve as drum washers. The used solvent material is pumped from these receptacles through aboveground piping to two aboveground storage tanks that are manifolded together. Valves on the manifold piping are normally open, so that the liquid level in the two tanks equalizes. Used solvent is pumped into the west tank; liquid then gravity flows into the east tank via the normally-open manifold piping. Accumulated used solvent and sludge material is periodically removed from this used solvent storage tank for offsite recycling. Solvent is removed through a 2-inch drain pipe on each tank, performed by a tanker truck equipped with a suction pump through a 3-inch pipe that is connected to the drain pipe using an adapter. Sludge and solids are removed through manways on the tanks. No other equipment or standby equipment is used in the operation of the aboveground tank.

The used solvent storage tanks are each 8,000-gallon horizontal welded steel cylinders, with reinforced flat heads, supported by steel skids on a reinforced concrete slab-on-grade. Both tanks are vented through a conservation breather vent to prevent over-pressuring. A high-level alarm is used to prevent overfilling the tanks. The liquid level in the east tank is monitored with a level indicator and recorded once daily. Since the tanks are manifolded together, the liquid level in the east and west tanks is the same. The tanks are located within a concrete

<sup>&</sup>lt;sup>1</sup> Part 264—Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities; Subpart J—Tank Systems: § 264.191 Assessment of existing tank system's integrity. §264.193 Containment and detection of releases.

<sup>&</sup>lt;sup>2</sup> Department of Environmental Quality; Hazardous Waste Management; Incorporation by reference [40 CFR 271.14 ] Requirements for Permitting



containment vault. The drum washers and pump (with in-line filter) are located within a curbed concrete containment "return and fill" area.

For the purpose of this assessment, the tank system has been defined to include the drum washers, the storage tanks, the pump and filter, the aboveground piping system that connects them, and associated secondary containment areas. Appendix A includes drawings for the system schematic process flow, facility layout, storage tank design, and drum washer design.

#### Hazardous Characteristics of the Waste

The used solvent material collected and stored by this system is a mixture of used solvent and sludge materials. The primary expected hazardous characteristics of the waste is ignitability, EPA hazard code I, and toxicity characteristics, EPA hazard code E. Refer to Appendix A for Material Safety Data Sheet (MSDS) of the primary components that comprise the used solvent mix stored in the system.

#### **Corrosion Protection and Materials Compatibility**

The used solvent system components are all located either in a building or in an aboveground reinforced-concrete vault area, and are not in contact with soil or groundwater. Accordingly, corrosion-resistant materials of construction with cathodic protection or electrical isolation devices are not required. The exterior of the tanks, piping, and other system components are protected from the atmospheric corrosion by paint. The tanks, piping, valves, and other ancillary equipment are all made from carbon steel or brass: diaphragms and liquid interface devices are made from neoprene or tetrafluoroethylene (TFE) materials. Prior experience with the system indicates the waste is compatible with carbon steel, brass, and the neoprene or TFE materials. These materials of construction should provide satisfactory protection from corrosion and adequate service life under the intended service conditions.

#### **INTEGRITY ASSESSMENT**

An integrity assessment was performed to detect leaks, cracks, corrosion, erosion or other deterioration of the system. The secondary containment areas were also checked. Documentation of the inspection and testing is in Appendix B.

Integrity Assessment Used Solvent Storage System, Tulsa, OK, Safety-Kleen Systems, Inc.
November 19, 2009



For this assessment, visual inspection, ultrasonic thickness measurements, and hydrostatic leak tests were used on the drum washers, tanks, and ancillary equipment. Visual inspection was conducted at the secondary containment areas.

The hydrostatic test on the system was accomplished by filling the used solvent tanks to approximately 90% of their maximum operating capacity and filling the drum washers to their capacity with used solvent. The tank was inspected for a period of approximately one and a half hours. The total system was inspected for a period of approximately two and a half hours under normal operating conditions. After these inspections, the solvent was pumped to the tanks to test the pump, filter, and piping for leaks under operating conditions.

The inspection and hydrostatic leak tests revealed no visible evidence of current cracks or leaks in the system, but found that the paint on the bottom of the tank was flaking and deteriorating.

Ultrasonic thickness measurements were obtained to document the current thickness of the tanks' shell and ends. Measurements were made with a Cygnus I intrinsically safe digital ultrasonic thickness meter. The meter was calibrated before arrival on site and field verified with a 0.500-inch thick piece of steel (provided by the instrument vendor for this use) to ensure the meter was still in calibration<sup>3</sup>. Underwriters Laboratories (UL) 142 was used as a guideline to evaluate tank-shell thickness. Table 13.1 of UL 142 provides for the minimum carbon steel shell thicknesses for new horizontal tanks.

WATER CAPACITY (GALLONS)	MAXIMUM DIAMETER (FEET)	MINIMUM METAL THICKNESS (INCHES)	
1,056TO 9,000	6.3	0.167	
9,000 TO 35,000	12	0.240	

The two storage tanks have a capacity of 8,000 gallons with a diameter of 8 feet. The stored material is used solvent with a specific gravity of approximately 0.8 to 0.9, relative to the specific gravity of 1.0 for water. Consequently, it appears that the UL recommendation for new tanks would provide a shell thickness in the range between 0.167 and 0.240 inches.

Documentation in Appendix B shows the locations where measurements were made and presents the results of the external thickness measurements. These measurements were made through existing paint. In locations where the paint was chipping or peeling, the paint was scraped off to provide a surface with consistent coverage. The Cygnus I ultrasonic thickness

Integrity Assessment Used Solvent Storage System, Tulsa, OK, Safety-Kleen Systems, Inc.

November 19, 2009

Page 3

<sup>&</sup>lt;sup>3</sup> The Cygnus 1 meter is designed to provide accuracy and resolution to 0.05 millimeters (0.002 inches). On-site calibration verification of the 0.500-inch steel plate read 0.500 inches.



meter uses an internal algorithm to distinguish paint from steel, and only reports the steel thickness. Thickness results are summarized in the following table.

	SHELL THICK	NESS (INCHES)	END THICKNESS (INCHES)		
	MINIMUM	MAXIMUM	MINIMUM	MAXIMUM	
EAST TANK	0.218	0.284	0.250	0.268	
WEST TANK	0.245	0.266	0.250	0.262	

These results suggest minor corrosion, particularly on the East tank shell.

Differences between any two data sets can be affected by manufacturer's material tolerances, different probe placement and nominal variations due to different instruments used, ambient temperature, and other variables inherent to the ultrasonic technology. These conditions should be considered when comparing current readings to readings taken during previous inspections.

#### **CONCLUSIONS**

The used solvent tank system at the Safety-Kleen Systems, Inc. facility in Tulsa, Oklahoma was inspected on November 2, 2009. External visual inspections were supplemented by hydrostatic leak test and by ultrasonic thickness measurements to evaluate the condition of the storage system.

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

Tank shell and end thickness values are well within an acceptable range, based on the suggested new-tank thickness provided in UL 142 table 13.1. The two horizontal tanks inspected as part of this used solvent storage system assessment are greater than five years old. These tanks will continue to be inspected every five years while in use, in accordance with the facility's RCRA permit.

Integrity Assessment Used Solvent Storage System, Tulsa, OK, Safety-Kleen Systems, Inc.
November 19, 2009

### APPENDIX F EMERGENCY INFORMATION

# Exhibit F-1 Example Emergency Information Sheet

#### EMERGENCY INFORMATION 16319 E. MARSHALL TULSA, OK. 74116 (918) 234-5185

#### **FACILITY EMERGENCY COORDINATORS**

Boz Cannon (Primary)	18701 E 42 <sup>nd</sup> Place	Work Cell: (918) 240-8628
Branch, General Manager	Tulsa, OK 74134	Office Phone: (918) 234-5191
_		
Billy Stopp (Secondary)	1589 E 60th Place	Work Cell: (918) 370-1366
Manager, Customer Service	Tulsa, OK 74105	Office Phone: (918) 234-5191

#### **FACILITY NOTIFICATION NUMBERS**

#### **INTERNAL:**

Safety-Kleen Incident 24-Hour Notification Syste	em 24-Hour (80	0) 468-1760
--	----------------	-------------

#### **EXTERNAL:**

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

#### **TULSA, OK EMERGENCY TEAMS**

Catoosa Police Department	911
Catoosa Fire Department	911 or (918) 596-9977
Saint Francis Hospital	911
Emergency Medical Services	911

### Exhibit F-2 Example Employee Emergency Functions

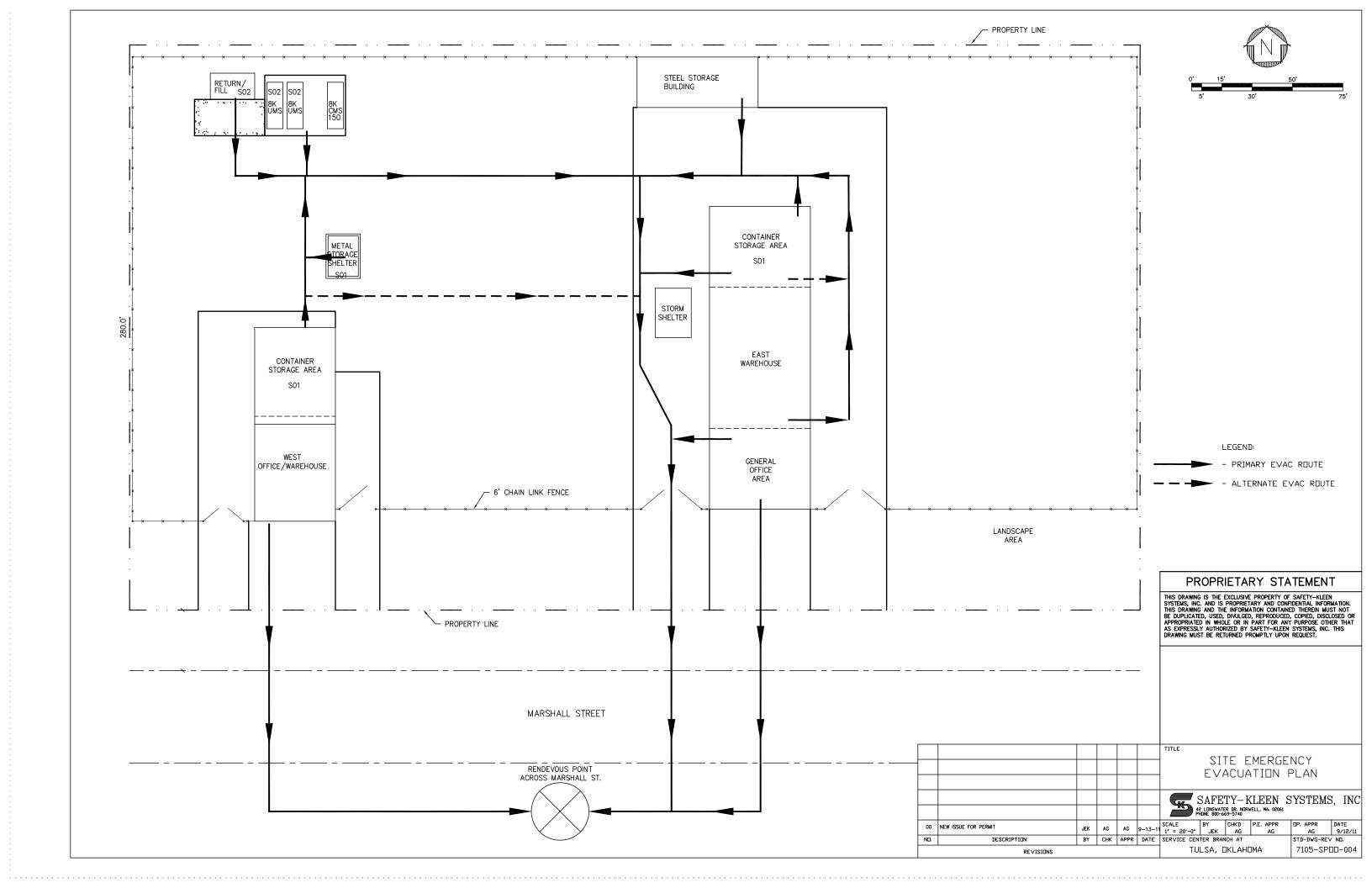
#### EMPLOYEE EMERGENCY FUNCTIONS

#### TITLE

#### EMERGENCY FUNCTION

Emergency Coordinator	-	Notify EHS Department
	-	Apply first aid
	-	Notify emergency agencies
	-	Shut off electricity
Alternate Emergency Coordinator	-	Function as Emergency Coordinator
		OR
	-	Supervise evacuation
Branch Administrator	-	Supervise evacuation
Customer Service Manager/Dispatcher	-	Retain, contain or slow the flow of solvent
Sales Representative	-	Retain, contain or slow the flow of solvent
Material Handler	-	Retain, contain or slow the flow of solvent

### Exhibit F-3 Site Evacuation Plan



# Exhibit F-4 Leak Detection and Repair Record

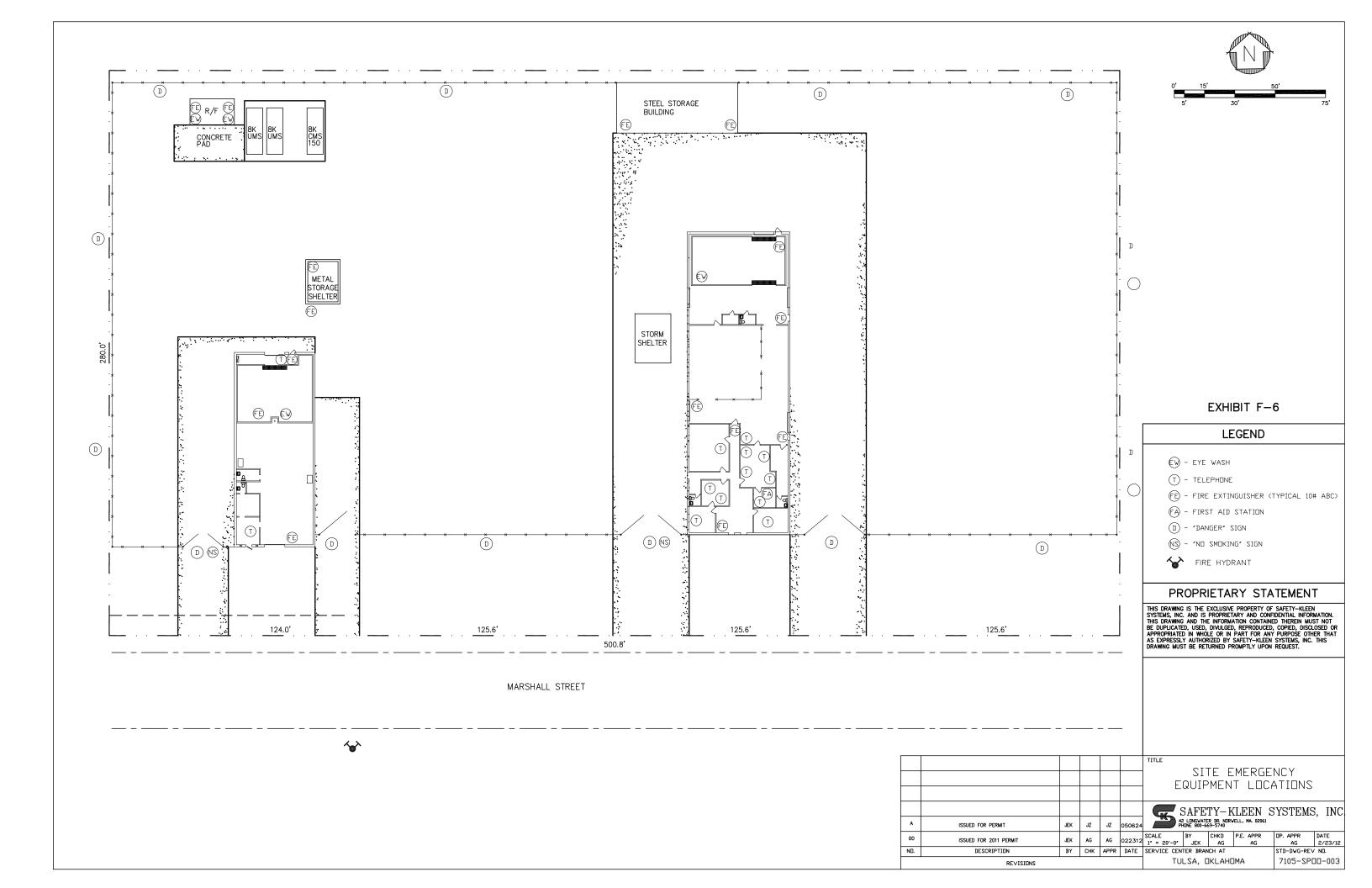
### Exhibit F-4 LEAK DETECTION AND REPAIR RECORD

Description	cation Number				
How was potential or actual leak detected?		Da	Date		's Signature
	ntial or actual leak:				
Instrument Monito	oring Within 5 Days:				
Monitoring Results	Repair Attempt	Method	Results	Date	Inspector's Signature
4					
2.		-			
3ate of Successful Repo	rt (must be completed with	nin 15 days)		Date	Inspector's Signature
Method 4.	Results	Date	Inspector's Si	=	
Followup Monthly Resul 5.	Monitoring for Valves ts Date	Inspector's S			
6.					
Monitoring Summa	ary		Reference Num	nber – See Abo	ve
Instrument #/Ope		1	2 3	4	5 6

### Exhibit F-5 Emergency Equipment List – Capabilities

F-5 Emergency Equipment List - Capabilities							
Equipment	Location	Description	Capabilities				
Gloves	Warehouse	Neoprene, Latex & Leather	Provide hand protection from cuts, splashes and exposure to contaminants				
Safety Glasses	Warehouse	Glasses, goggles, face masks	Eye and splash protection				
Aprons	Warehouse	Front coverage aprons	Prevent splashes to clothing				
Eyewash/Shower Combo Eyewash	Areas with potential contamination to eyes ( warehouse, return and fill)	Hard plumbed unit Portable unit Bottled eye wash	Purges contaminants from eyes and body				
Fire Extinguisher	Office areas, warehouses, return and fill, flam shed, tank farm, all trucks	10 & 20 lb units	ABC rated for wood, paper, electrical and solvent fires.				
Absorbent & Spill Dry Material	Warehouse, tank farm, route trucks	Booms, pads, granular absorbent, vermiculite	Capable of absorbing liquid spills of aqueous & petroleum type spills				
Respirators	Issued to individual employees	Half face or full face	Protection from exposure to organic solvents, acids gases and ammonia				
Telephones	Warehouse and office	Standard office phone & company-supplied cell phones	Allows employees to summon outside assistance in case of emergency				
Emergency Alarm	Return and Fill	Red push button alarm on dock	Alarm emits a loud siren, audible to surrounding area and inside office, to notify of a problem in the return and fill.				
Brooms, Buckets, Mops, Portable Pump and Wet/Dry Vacuum	Warehouse		Used to contain and pick-up spills.				
First Aid Kits	Warehouse All trucks		Provide medical care for minor injuries				

### Exhibit F-6 Site Emergency Equipment Locations



### Exhibit F-7 Contingency Plan Quick Reference Guide

#### CONTINGENCY PLAN QUICK REFERENCE GUIDE

Safety-Kleen Systems, Inc. 16319 E. Marshall St Tulsa, OK Office: (918) 234-5191 OKD000763821

#### **Facility Contacts:**

Primary Emergency Coordinator

Boz Cannon

Mobile Phone (24/7)

(918) 240-8628

Alternate Emergency Coordinator

Billy Stopp

Mobile Phone (24/7)

(918) 370-1366

Note: This facility typically operates weekdays 7:00 AM – 5:00 PM

#### **Hazardous Waste Information:**

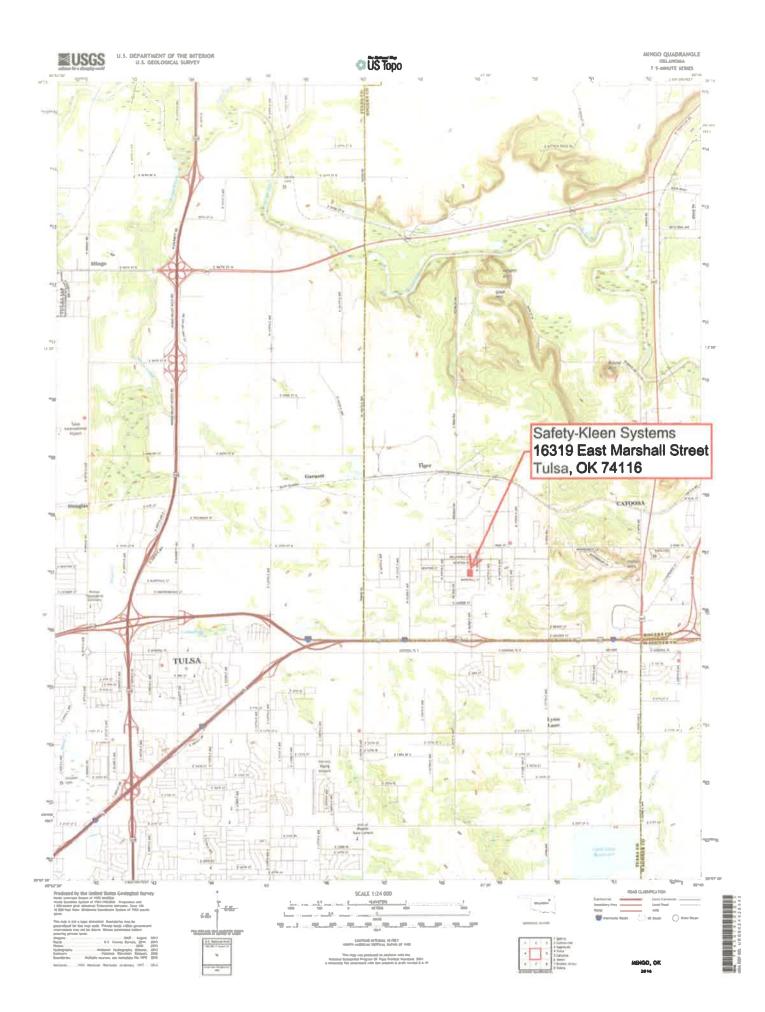
Name of Waste	Waste	Location	Maximum	Response Notes	Special Notes to
	Codes/Hazards	Accumulated	Amount		Hospital/Treatment Personnel
			Present		
Parts Washer Solvent 150 Bulked	D001, (Ignitability; flash point <140°F) D039 (Toxic, ppm levels) and Potentially D-Codes Listed in Note Below	Above Ground Storage Tank in Containment	15,000 Gallons	Media to use includes regular dry chemical, foam, water spray, and water fog. Combustible liquid and vapor. The vapor is heavier than air. Decomposition and combustion materials may be toxic. Burning may produce carbon monoxide and other organic compounds. Wear full protective firefighting gear including SCBA. Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tanks due to fire. Stay away from the ends of tanks. For tank, rail car or tank truck, evacuation radius: 800 meters (1/2 mile). Stay upwind and keep out of low areas. Spills: Use foam on spills to minimize vapors. Keep out of water supplies and sewers. Absorb with earth, sand or other	Acute: May be fatal if swallowed and enters airways. May cause drowsiness or dizziness.  Delayed: May cause damage to central nervous system.  Special treatment Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident.  Call 1-800-468-1760 for additional information.

				noncombustible material and transfer to container. Use non-sparking tools. Large spills: Reduce vapors with water spray. Dike for later disposal.	
Parts Washer Solvent 150	D039 (Toxic) and Potentially D-Codes Listed in Note Below	Return and Fill Area	Varies – Waste received from offsite generators	Media to use includes Class B/C or Class A/B/C fire extinguisher, carbon dioxide, regular dry chemical, foam, water spray, and water fog. Combustible liquid and vapor. The vapor is heavier than air. Decomposition and combustion materials may be toxic. Burning may produce carbon monoxide and other organic compounds. Wear full protective firefighting gear including SCBA. Move container from fire area if it can be done without risk. Cool containers with water spray until well after the fire is out. Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible withdraw from area and let fire burn. Stay upwind and keep out of low areas. Spills: Use foam on spills to minimize vapors. Keep out of water supplies and sewers. Absorb with earth, sand or other noncombustible material and transfer to container. Use non-sparking tools.	Acute: May be fatal if swallowed and enters airways. May cause drowsiness or dizziness.  Delayed: May cause damage to central nervous system.  Special treatment Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident.  Call 1-800-468-1760 for additional information.
Parts Washer Bottom Sludge	D001, (Ignitability; flash point <140°F) D039 (Toxic) and Potentially D-Codes Listed in Note Below	Return and Fill Area or Warehouse	Typically < 4 55-gallon drums	See above	Acute: May be fatal if swallowed and enters airways. May cause drowsiness or dizziness.  Delayed: May cause damage to central nervous system.  Special treatment Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident.  Call 1-800-468-1760 for additional information.
Aqueous Parts Washer Solutions	Typically non-regulated, but may occasionally carry D-Codes Listed in Note Below	Warehouse or Lot	Varies – Drums of waste received from offsite generators	Fire extinguisher media should be based on surrounding materials. Negligible fire hazard. Burning may produce oxides of carbon. Use water spray to keep fire-exposed materials cool.	Acute: May cause skin irritation. May cause eye irritation. May cause respiratory irritation.  Delayed: Repeated exposure may cause skin dryness or cracking. Treat symptomatically and supportively.

Immersion Cleaner	D039 and Potentially D-Codes Listed in Note Below	Warehouse	Varies – Drums of waste received from offsite generators	Fire: Use Carbon dioxide, alcohol-resistant foam, dry chemical, water spray, water fog. Combustible liquid. The vapor is heavier than air. Vapors or gases may ignite at distant ignition sources and flash back. Heated containers may rupture or be thrown into the air. Decomposition and combustion materials may be toxic. Burning may produce nitrogen oxides, acid halides, carbon monoxide, and unidentified organic compounds. Move container from fire area if it can be done without risk. Cool containers with water spray until well after the fire is out. Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible withdraw from area and let fire burn. Stay upwind and keep out of low areas. Dike for later disposal. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies. Spills: Contain spill away from surface water and sewers. Sorb with compatible sorbent material and shovel with a clean, spark proof tool into a sealable container for disposal.	Acute: Fatal if inhaled, eye, skin, liver, nervous and respiratory system, spleen, and testes damage, blood system disorders, respiratory tract irritation, skin and respiratory sensitizer, aspiration hazard. Delayed: Cancer, reproductive effects, skin and respiratory sensitizer. Special treatment: Treat symptomatically and supportively. Call 1-800-468-1760 for additional information.
Dry Cleaning Waste (Perchloroethylene)	F002, D039 and Potentially D-Codes Listed in Note Below	Warehouse	Typically < 4 30-gallon drums	Fire: Product itself does not burn, but may decompose upon heating to produce phosgene, halogenated compounds, hydrogen chloride gas, carbon monoxide, and unidentified organic compounds. A positive-pressure, SCBA and full-body protective equipment are required for fire emergencies. Move container from fire area if it can be done without risk. Cool containers with water spray until well after the fire is out. Vapors will spread along the ground and collect in low or confined areas. Spills: Sorb with compatible sorbent material shovel into a sealable container for disposal.	Acute: Causes skin irritation, eye irritation, central nervous system damage, liver damage, and respiratory system damage. May cause central nervous system depression. Delayed: Causes liver damage, nervous system damage, and respiratory system damage. May cause mutagenic effects, cancer, reproductive effects, and kidney damage. Special Treatment: Treat symptomatically and supportively. Do not administer Adrenaline (epinephrine) or similar drugs following product overexposure. Increased sensitivity of the heart to such drugs may be caused by overexposure to product. Administration of gastric lavage and/or activated charcoal slurry may be considered. Treatment may vary with condition of victim and specifics of incident.

Paint Waste	D001 (Ignitability; flash point <140°F), F003, F005 (Methyl Ethyl Ketones, Acetone, MIBK), Toxicity	Warehouse or Flam Shed	Varies – Drums of waste received from offsite generators	Fire: Use Carbon dioxide, alcohol-resistant foam, dry chemical, water spray, water fog. Combustible liquid. If contact occurs, remove contaminated clothing & wash before reuse. If contact with skin, flush with soap and water. Get medical attention if irritation develops. If contact with eyes, flush with water-seek medical attention. If inhaled, move to fresh air and keep at rest-seek medical attention. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies. Spills: Contain spill away from surface water and sewers. Sorb with compatible sorbent material and shovel with a clean, spark proof tool into a sealable container for disposal.	If ingested, do not induce vomiting. If vomiting occurs, keep head lower than hips to prevent aspiration.
Various Other Hazardous Wastes Received from Offsite Generators	D001 (Ignitability; flash point <140°F), D002 (Corrosives) Various Toxics Varies – Wastes Received from Offsite Generators	Warehouse	Varies – Drums of waste received from offsite generators	If contact occurs, remove contaminated clothing & wash before reuse. If contact with skin, flush with soap and water. Get medical attention if irritation develops. If contact with eyes, flush with water-seek medical attention. If inhaled, move to fresh air and keep at rest-seek medical attention.	If ingested, do not induce vomiting. If vomiting occurs, keep head lower than hips to prevent aspiration.

**NOTES:** D-Codes: **Container Storage** – 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, and D043 **Tank Storage** – Dirty Solvent D001 D018 D039 D040



### SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN SITE MAP Safety-Kleen

16319 East Marshall Road Tulsa, OK 74116



#### MAP LEGEND

#### DRAMAGE FEATURES & TRANSFER AREAS

Oil Transfer Area

-> Direction of Flow

Floor Drain to 330-gallon Pit

#### **OIL STORAGE INVENTORY**

1: 2 X 7,800-Gallon Waste Solvent AST and 7,800-Gallon Clean Solvent AST

2: 2 X 300-Gallon Engine Oil Tote

3: 7 X 250-Gallon Miscellaneous Liquid Waste

**4:** 96 X 55-Gallon Miscellaneous Lubricants and Engine Oil

#### SECONDARY CONTAINMENT

Concrete Berm

A Spill Kit

Latitude: 36°10'22" N Longitude: 95°47'40" W June 2019





Tulsa











Tulsa

FIRE HYDRANT FLOW < 1500 GPM

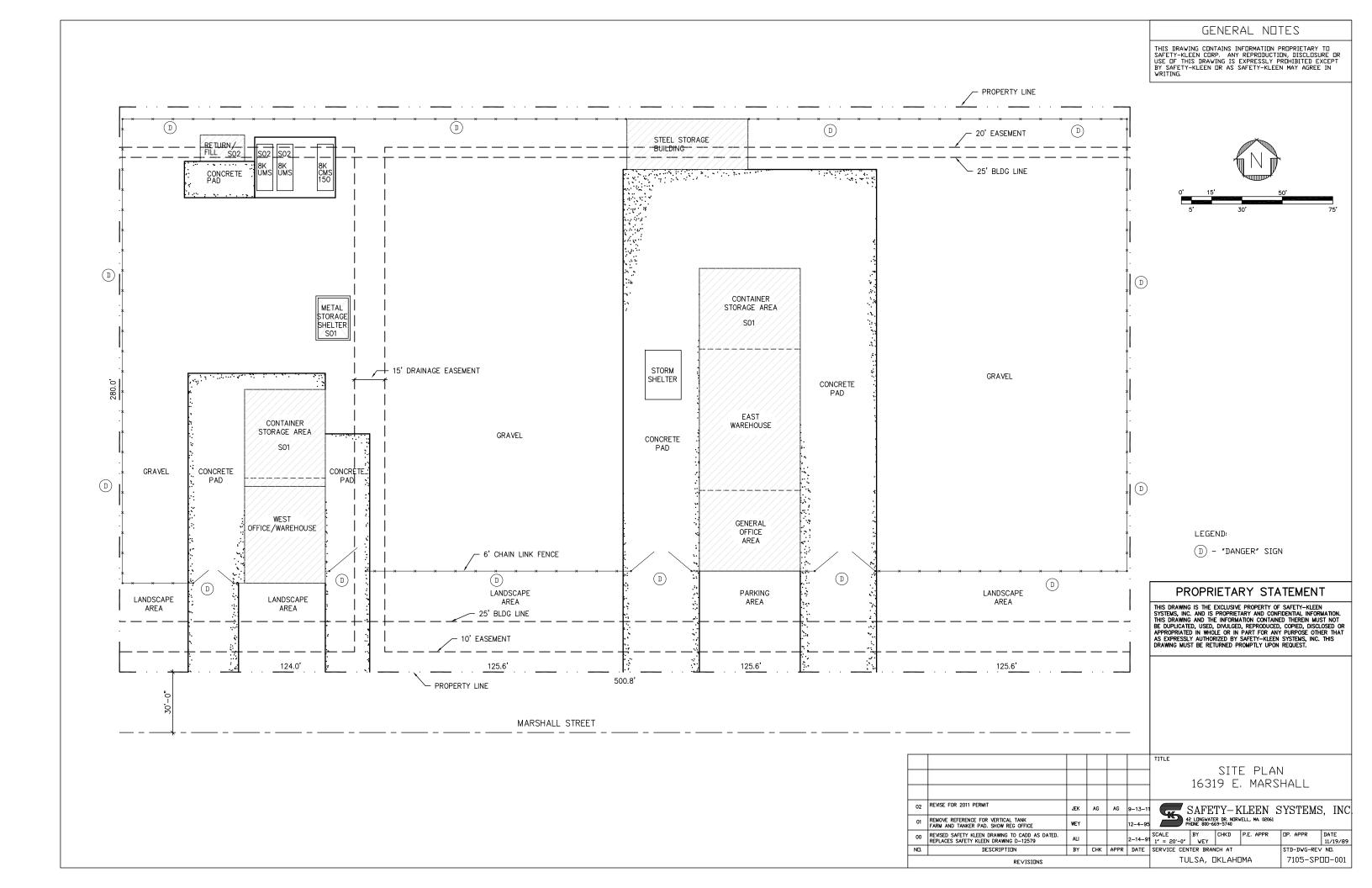
1 Emergency Exit

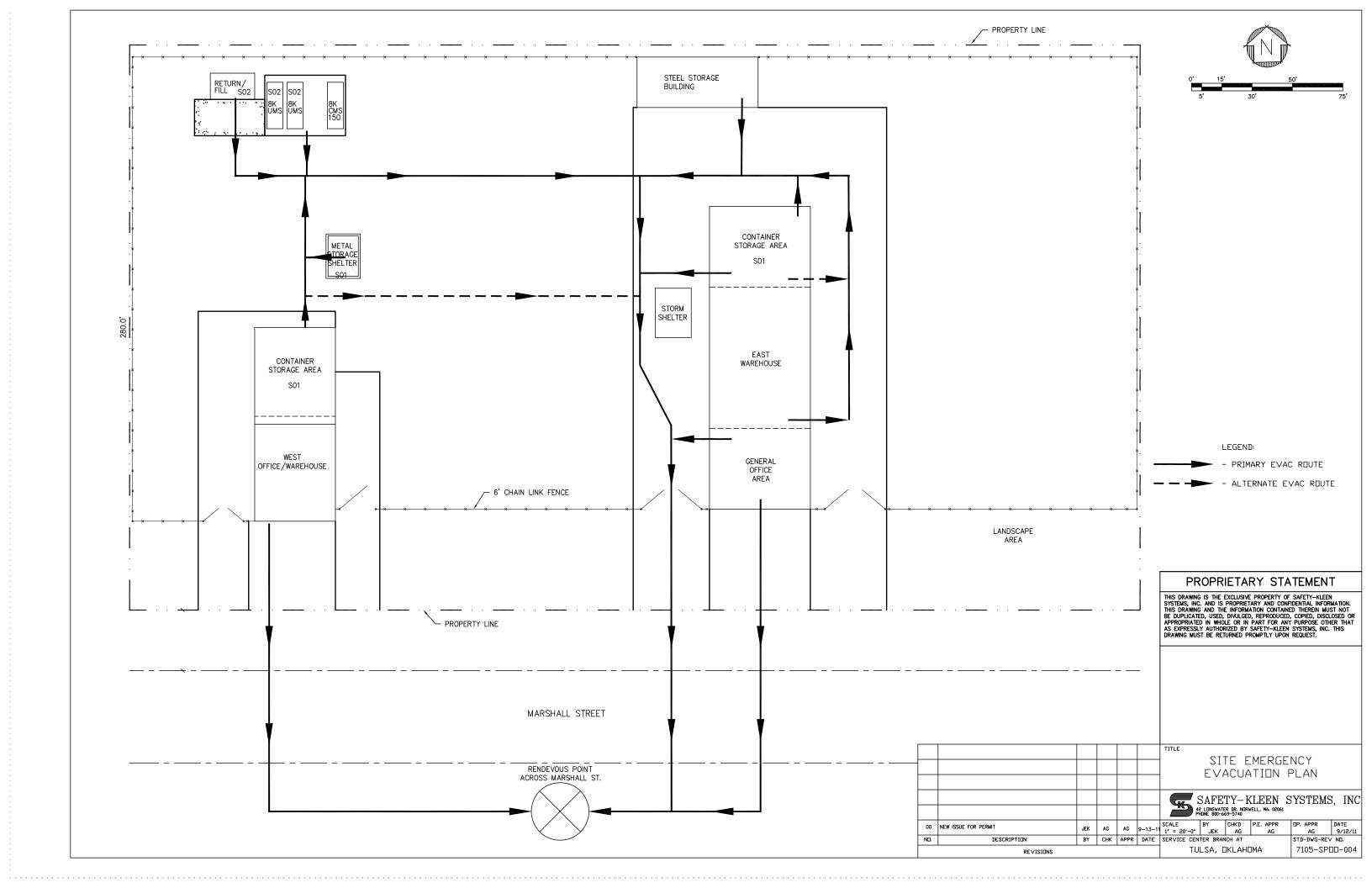
**X** Fire Extinguisher

Rally Point

XX Fire Hydrant

SITE BOUNDARY





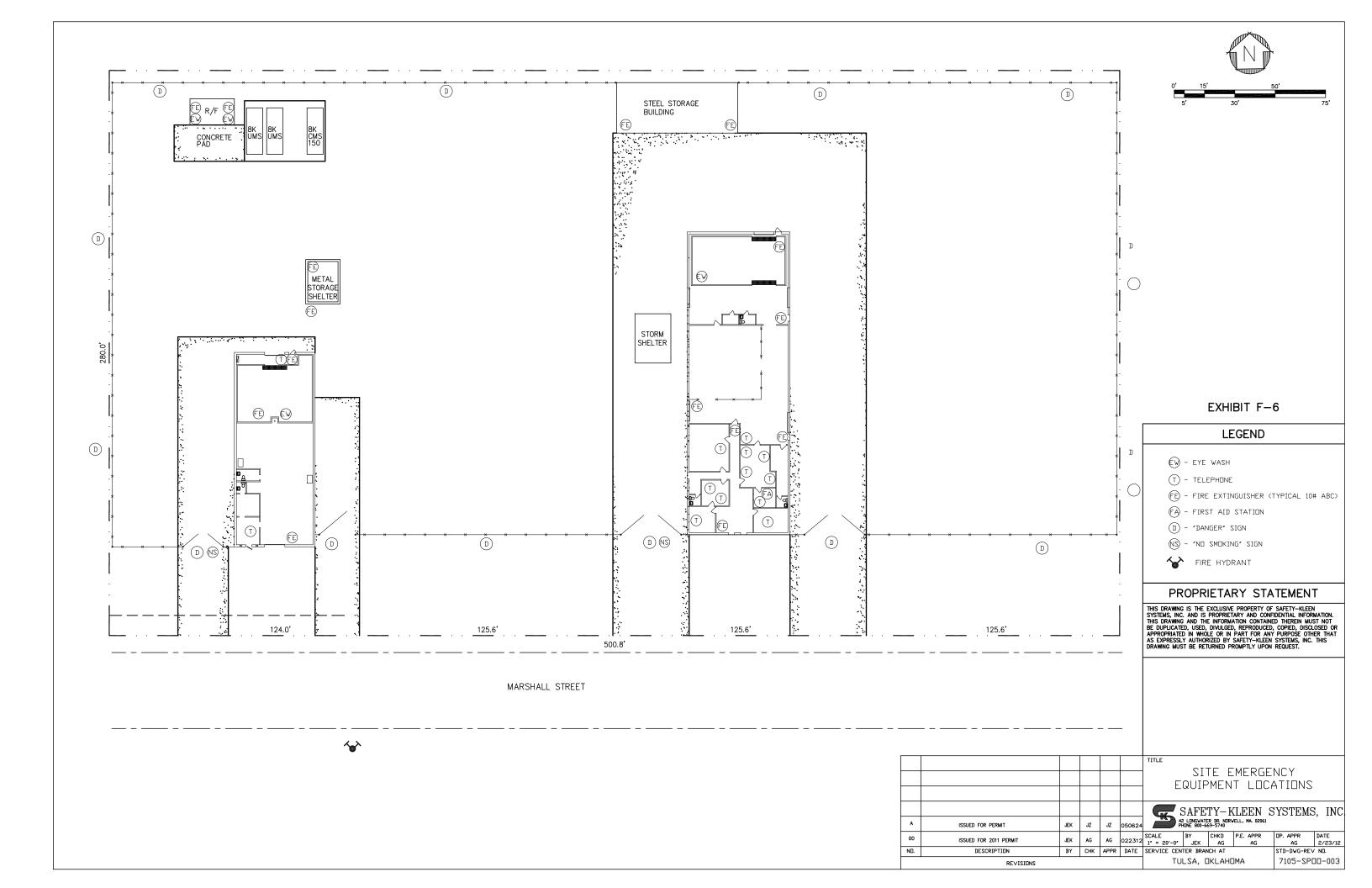


Exhibit F-5 Emergency Equipment List - Capabilities						
Equipment	Location	Description	Capabilities			
Gloves	Warehouse	Neoprene, Latex & Leather	Provide hand protection from cuts, splashes and exposure to contaminants			
Safety Glasses	Warehouse	Glasses, goggles, face masks	Eye and splash protection			
Aprons	Warehouse	Front coverage aprons	Prevent splashes to clothing			
Eyewash/Shower Combo Eyewash	Areas with potential contamination to eyes (warehouse, return and fill)	Hard plumbed unit Portable unit Bottled eye wash	Purges contaminants from eyes and body			
Fire Extinguisher	Office areas, warehouses, return and fill, flam shed, tank farm, all trucks	10 & 20 lb units	ABC rated for wood, paper, electrical and solvent fires.			
Absorbent & Spill Dry Material	Warehouse, tank farm, route trucks	Booms, pads, granular absorbent, vermiculite	Capable of absorbing liquid spills of aqueous & petroleum type spills			
Telephones	Warehouse and office	Standard office phone & company-supplied cell phones	Allows employees to summon outside assistance in case of emergency			
Emergency Alarm	Return and Fill	Red push button alarm on dock	Alarm emits a loud siren, audible to surrounding area and inside office, to notify of a problem in the return and fill.			
Brooms, Buckets, Mops, Portable Pump and Wet/Dry Vacuum	Warehouse		Used to contain and pick-up spills.			
First Aid Kits	Warehouse, All trucks		Provide medical care for minor injuries			

### APPENDIX G TRAINING INFORMATION

# Exhibit G-1 Job Descriptions

### BRANCH GENERAL MANAGER

### JOB DESCRIPTION

The Branch General Manager (BGM) has overall responsibility for the facility operations and maintenance, and directs sales activities within a certain geographic area defined by the Corporate Marketing Department. He or she is responsible for the proper operations and profitability of the service center.

### **REPORTS TO:**

Area Manager

### **QUALIFICATIONS:**

Minimum high school graduate with Safety-Kleen sales experience.

- 1. Plan, direct, and monitor activities of sales representatives.
- 2. Training of branch sales managers, sales representatives, and other branch personnel.
- 3. Assist or accompany sales representatives during their sales activities when necessary.
- 4. Tabulate daily sales and inventory figures and report them to the corporate offices.
- 5. Maintain adequate inventory of solvents, allied products, and equipment.
- 6. Carry out corporate policies and standards regarding facilities, equipment operation and maintenance.
- 7. Insure the regular inspection of the facility and equipment, and the implementation of any necessary repairs or remedial actions.
- 8. Represent Safety-Kleen Systems, Inc. in local community affairs and public relations activities.
- 9. Coordinate with corporate Technical Services, Environmental Compliance and Health and Safety Departments and implement necessary actions or plans for regulatory compliance.
- 10. Be able to act as the primary emergency response coordinator.

### CUSTOMER SERVICE MANAGER

### JOB DESCRIPTION

The Customer Service Manager (CSM) is charged with the responsibility of generating new business and servicing established accounts within a certain defined geographic area. In addition, the Customer Service Manager may be the designate for some of the responsibilities of the Branch General Manager.

### REPORTS TO:

Branch General Manager

### **QUALIFICATIONS:**

Minimum high school graduate.

- 1. Maintain his/her route truck and replenish products on the truck before beginning his/her route sales.
- 2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
- 3. Exchange spent solvents with fresh solvent and replenish inventory of Safety-Kleen's products for existing customers.
- 4. Make minor repairs of Safety-Kleen's parts cleaner equipment or lease new equipment to the customers.
- 5. Prepare the necessary paper work for each service, and bill or credit the customer, as necessary.
- 6. At the end of each day or route, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the branch manager can tabulate the daily figures and forward them to the corporate office.
- 7. Be able to act as the alternate emergency response coordinator.
- 8. Perform other related duties as assigned by the Branch General Manager.

### BRANCH DISPATCHER

### JOB DESCRIPTION

The Branch Dispatcher is charged with the responsibility of fleet management including service route optimization, handheld management, and maintaining DOT compliance. In addition, the Branch Dispatcher may be the designate for some of the responsibilities of the Branch General Manager.

### **REPORTS TO:**

Branch General Manager

### QUALIFICATIONS:

Minimum high school graduate.

- 1. Ensure that handheld units are working effectively.
- 2. Optimize route efficiency for all drivers and ensure on-time performance.
- 3. Ensure that fleet trucks are in compliance with all DOT requirements including annual inspection requirements.
- 4. Maintain DOT compliance to Include Driver Qualification files, DVCR's, and Driver Log Compliance
- 5. Accountable for efficient inventory utilization and accuracy.
- 6. Responsible for all facility maintenance including vendor management.
- 7. Be able to act as the alternate emergency response coordinator.
- 8. Execute scheduling and routing, maximizing customer yield and asset utilization.

### MARKET SALES SPECIALIST

### JOB DESCRIPTION

The Market Sales Specialist is charged with the responsibility of generating new business and servicing established accounts within a certain defined geographic area.

### REPORTS TO:

Branch General Manager

### QUALIFICATIONS:

Minimum high school graduate.

- 1. Maintain his/her route truck and replenish products on the truck before beginning his/her route sales.
- 2. Contact potential customers for the purpose of selling Safety-Kleen services and allied products.
- 3. Exchange spent solvents with fresh solvent and replenish inventory of Safety-Kleen's products for existing customers.
- 4. Make minor repairs of Safety-Kleen's parts cleaner equipment or lease new equipment to the customers.
- 5. Prepare the necessary paper work for each service, and bill or credit the customer, as necessary.
- 6. At the end of each day or route, return the truck to the branch for cleaning and maintenance, and summarize the day's activities so the branch manager can tabulate the daily figures and forward them to the corporate office.
- 7. Be able to act as the alternate emergency response coordinator.

### BRANCH ADMINISTRATOR

### **JOB DESCRIPTION**

The Branch Secretary performs duties to assist the branch manager, sales representatives and customers with billing, scheduling and recordkeeping. Performs secretarial duties at the branch.

### REPORTS TO:

Branch General Manager

### **QUALIFICATIONS:**

Attended high school.

- 1. Maintains records in an orderly manner.
- 2. Assist sales representatives in scheduling services.
- 3. Insure that all hazardous waste manifests are complete, and manage distribution and filing of copies.
- 4. Maintain Personnel Training Record files.
- 5. Maintain Facility Inspection Records.
- 6. Answer customer inquiries.
- 7. Manage customer billing.
- 8. Perform other related duties as assigned.
- 9. Be able to act as the alternate emergency response coordinator.

### MATERIAL HANDLER

### **JOB DESCRIPTION**

The Material Handler performs duties to assist the sales representatives in loading and unloading trucks. Performs janitorial duties in the warehouse.

### **REPORTS TO:**

Branch General Manager

### **QUALIFICATIONS:**

Attended high school.

- 1. Maintain warehouse in clean and orderly manner.
- 2. Assist sales representatives in loading trucks and replacing solvent.
- 3. Refurbish drums as needed.
- 4. Park or move trucks as needed.
- 5. Stock inventory.
- 6. Replenish trucks with inventory.
- 7. Perform other related duties as assigned.

# Exhibit G-2 Example Training Plan Outlines

### **EXAMPLE**

### TRAINING PLAN OUTLINE - BRANCH GENERAL MANAGER

Review of Environmental Notebooks/Feasibility Study and Plan of Operation

Part A Application Financial Requirements

Waste Analysis Plan Training Plan

Contingency Plan Transportation Licensing

Review of Environmental Compliance Guidance and Corporate Policy Manual

Labels and Shipping Documents Land Ban Notifications

Spill Reporting Preparation for Agency Inspections

Conduct Detailed Facility Inspection with Regional Manager

Identify deficiencies requiring branch attention Identify problems requiring Technical Services assistance Review actual vs. permitted waste storage capacities

File Review

Manifests and Land Ban Notices Training Files

Spill Report File Community Right-to-Know Files

Inspection Records

Contingency Plan Training Session with Branch General Manager and All Alternate Emergency Coordinators

- Including Spill Simulation and Response
- Updating the Emergency Information and Local Authority Notifications

Notifications

Health and Safety

OSHA 300 Reporting Hazardous Communication Program

Review of Past Agency Inspections and Other Past Branch Compliance related issues

**Environmental Training for Branch Personnel** 

- Recordkeeping
- Conducting Training Sessions

### **EXAMPLE**

### INTRODUCTORY AND ANNUAL TRAINING TOPICS FOR

### Service Center Personnel

- A. Hazard Communication Safety Training
- B. Hazard Communication Understanding SDSs
- C. Waste Analysis Plan

Includes a review of the Part A Permit Application; sampling and analysis procedures, and recordkeeping

- D. Preparedness and Prevention Plan and Contingency Plan
  - a. Procedure for using, inspection, repairing and replacing facility emergency response equipment must be reviewed
  - b. Communications or alarm systems
  - c. Response to fires or explosions
  - d. Response to ground water contamination incidents
  - e. Shutdown of facility operations
  - f. Automatic waste feed cut-off systems
- E. Preventing Injuries and Illness
- F. Hazards Associated with Handling Hazardous Materials

Employees requiring the use of a respirator will be respirator fit tested

- G. Chemistry of Safety-Kleen Products
- H. Hazardous Materials Regulations
- I. Manifesting
- J. Spill Simulation and Spill Reports

NOTE: EMPLOYEES MAY NOT WORK IN UNSUPERVISED POSITIONS UNTIL THEY HAVE RECEIVED EMERGENCY RESPONSE TRAINING. EMPLOYEES MUST BE COMPLETELY TRAINED, IN ALL THE ITEMS LISTED ABOVE, WITHIN SIX MONTHS OF STARTING AND ANNUALLY THEREAFTER.

# EXAMPLE PERSONNEL TRAINING COURSE REQUIREMENTS

# PERSONNEL REQUIRED TO ATTEND INTRODUCTORY TRAINING COURSES

- 1. Branch General Manager
- 2. Branch Secretary
- 3. Customer Service Manager
- 4. Sales Representative
- 5. Material Handler

### PERSONNEL REQUIRED TO ATTEND ANNUAL TRAINING COURSES

- 1. Branch General Manager
- 2. Branch Secretary
- 3. Customer Service Manager
- 4. Sales Representative
- 5. Material Handler

### PERSONNEL REQUIRED TO RECEIVE ON THE JOB TRAINING

- 1. Branch General Manager
- 2. Branch Secretary
- 3. Customer Service Manager
- 4. Sales Representative
- 5. Material Handler

## PERSONNEL RECEIVING TRAINING WHEN REGULATIONS AND/OR PROCEDURES CHANGE

- 1. Branch General Manager
- 2. Branch Secretary
- 3. Customer Service Manager
- 4. Sales Representative
- 5. Material Handler

# Exhibit G-3 Example Training Record Form

# SAFETY-KLEEN SYSTEMS TRAINING ATTENDANCE / CERTIFICATION SHEET



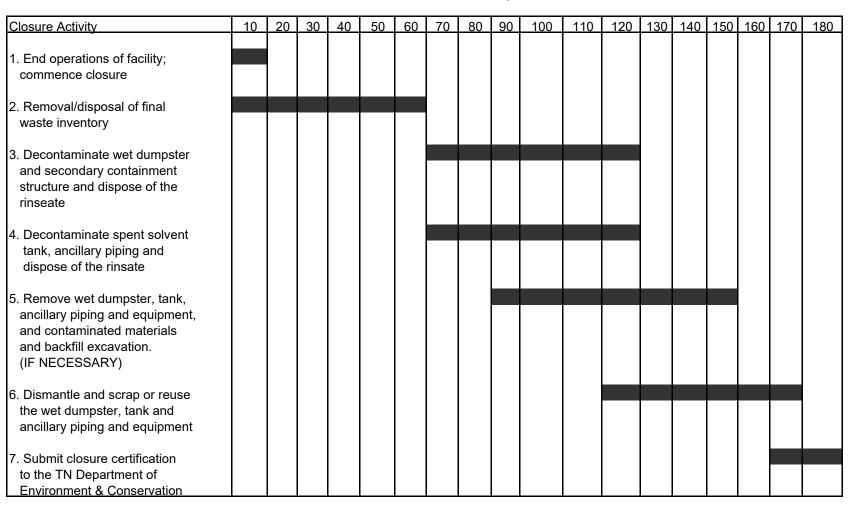
Date:	Date: Training Location:Nashville, TN					
	lame:	_				
Course C	'ode:	Time:	Duration:			
	PRINTED NAME	SIGNATURE	EMPLOYEE#	FACILITY (CITY, STATE)		
1.						
2.						
3.						
2. 3. 4. 5. 6.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						
17.						
18.						
19.						
20.						
21. 22. 23. 24. 25.						
23.						
24.						
25.						
The above l	listed employees have satisfactorily passed as	sociated tests and, demonstrated satisfactor	ry performance and comprehe	nsion of this course.		
Trainer:		Trainer's Signature:	<del></del>			
	(Please Print Name)	Trainer's Location:				
Trainer:	(Please Print Name)	Trainer's Signature:				
	(a rouse time traine)	Trainer's Location:				

# APPENDIX H FINANCIAL REQUIREMENTS

# Exhibit H-1 Closure Schedule

### **Estimated Closure Schedule**

### Calendar Days



# Exhibit H-2 Closure Cost Estimate

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtota Cos
INVENTORY REMOVAL	Category	Olik Charge	Listinute	
Assumptions		Ca	pacity (gallons)	
- Waste mineral spirits tank(s) is full				
-Tank One			8000	
-Tank Two	Total Tank Capacit	y	8000 16000	
- Return/Fill station is full				
-Maximum capacity of drum washers added to waste mineral spirits tank quantity			324	
- Container storage area(s) full				
-CSA 1			6192	
-CSA 2			0	
	Total CSA Capacit	y	6192	
- Flammable materials storage shelter is full			2184	
Subcontractor Costs				
- Transfer tank contents to tankers				
Tank Capacity (total gallons)			16324	
Work Rate to Unload Tank Capacity (hours per gallon)			0.0003	
Total Hours to Unload  Labor and equipment rate to unload (PPE Level D) and cost	Labor/equipment	\$175.95	4.9 4.9	\$862
- Transport waste mineral spirits to a TSD for treatment/disposal				
Number of tanker trailers required (6,000 gallons max each load)			3	
Cost per mile =\$5.64/mile				
Mileage = 300 miles (Number in second column is 300 miles x number trucks)	Transport = 300 miles each	\$5.64	900	\$5,076
Disposal/treatment cost (per gallon - Avergae bulk liquid cost)	TSD @\$1.67/gallon	\$1.670	16324	\$27,261
- Transfer drums from CSA(s) to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	113	\$403
(Number in second column is number of drums determined from total CSA capacity)				
- Transfer drums from Flammable Materials Storage Shed to trucks with forklift				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	40	\$143
(Number in second column is number of drums determined from flam shed capacity)				
- Transport drums to TSD for Treatment/Disposal				
Total Number of Drums (Number is total of CSA drums and Flam Shed drums)			153	
Total Number of Trucks Required to Transport Drums (84 per truck max)			2	
Cost per mile =\$5.64/mile  Mileage = 300 miles (Number in second column is 300 miles x number of trucks)	Transport trailer(s) x 300 miles	\$5.64	600	\$3,384
Disposal/treatment cost (per drum - Average drum cost)	TSD @ \$179/drum	\$3.64 \$179	153	\$27,387
touthou von (per dam 1110 de dam von)	100 - 41/7/44411	¥**/		Ψ2.,501
Activity	1. Subtotal			\$64,516

\$16,079

Hourly Rate Hours or Subtotal Cost Unit Charge Estimate

Category

#### 2. STORAGE TANK DECONTAMINATION

#### Assumptions:

- The tanks, piping and appurtenant equipment are decontaminated and remain in place
- Rinsate sampling necessary because the tank will remain in place. Assumes 1 rinsate sample per tank.
- Includes decontamination of the containment area
- Assumes containment area to remain in place following decontamination
- Assumes 1 rinsate sample required to leave containment in place
   Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection.
   Tank Interior Square Footage (based on tank volume)

Activity

<ul> <li>Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engine</li> </ul>	er's inspection.			
- Tank Interior Square Footage (based on tank volume)		5	Square Footage	
- Tank 1			611	
- Tank 2			611	
- Piping, 1,000 feet			785	
	Total Tank and Piping Interior Square Footage		2007	
- Tank Farm Containment Square Footage (includes floor and walls)			1979	
Prime Contractor Costs				
-Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Sample(s) (1 per tank and 1 per containment)				
Work Rate for Sampling (hours per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.00	\$92
- Drilling for Soil Samples (2.5 in boring to 1 ft each)				
Work Rate for Drilling (hours per foot)			0.3050	
Number of Feet (subslab sample depth = 1 foot each)			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29	0.61	\$89
- Collect 2 Soil Samples				
Work Rate for Sampling (hours per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.00	\$92
Subcontractor Costs				
- Decontaminate waste AST, piping and appurtenant equipment				
Work Rate to Pressure Wash (hours per square foot)			0.0405	
Area of Tanks to be decontaminated			2007	
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	\$97.23	81	\$7,902
- Decontaminate Tank Containment Area				
Work Rate to Pressure Wash 1 sq ft (hours per square foot)			0.0405	
Total Area of Containment (includes walls and floor)			1979	
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	\$65.77	80	\$5,271
Laboratory Subcontractor Costs				
- Analyze rinsate sample(s) from tank(s) and containment area for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample			
	SVOCs @ \$359/sample			
	8 RCRA Metals @ \$110/sample			
	Total per sample cost	\$658	2	\$1,316
- Analyze soil sample(s) from containment area for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample			
- Analyze son sample(s) from contaminent area for vocs, 5 vocs and rcra metals	SVOCs @ \$189/sample			
	8 RCRA Metals @ \$110/sample			
	Total per sample cost	\$658	2	\$1.316
	rotai per sample cost	\$U.50	4	\$1,510

Activity 2. Subtotal

Hourly Rate Hours or Subtotal Unit Cost Unit Charge Estimate

Category

### 3. DECONTAMINATE THE RETURN/FILL STATION

### Assumptions:

- Decontamination shall consist of washing with detergent/water solution and rinsing with high-pressure spray
- Return/Fill structure and dock area will remain in place following decontamination
- Drum washers to remain in place or sent offsite for reuse following decontamination
- $\hbox{- Rinsate sampling required from each drum washer to remain in place or sent offsite for reuse, and from containment}\\$
- As

Activity

Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection Square footage used for decontamination includes containment, dock and drum washer units			Square Footage 1000		
Prime Contractor Costs					
-Costs for oversight and engineers inspection included in Closure Certification Activity below					
- Collect Rinsate Samples (1 per drum washer plus containment)					
Work Rate for Sampling ( hours per sample)			0.5000		
Number of Samples		004.00	3	0.4.00	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.50	\$138	
- Drilling for Soil Samples (2.5 in boring to 1 ft each)					
Work Rate for Drilling (hours per foot)			0.3050		
Number of Feet (subslab sample depth $= 1$ foot each)			2		
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29	0.61	\$89	
- Collect Soil Samples					
Work Rate for Sampling (per sample)			0.5000		
Number of Samples			2		
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.00	\$92	
Subcontractor Costs					
- Decontaminate waste AST, piping and appurtenant equipment					
Work Rate to Pressure Wash (hours per square foot)			0.0405		
Area of Returen/Fill to be decontaminated			1000		
Labor and equipment for tank decon (PPE Level C)	Labor/equipment	\$97.23	41	\$3,938	
Laboratory Subcontractor Costs					
- Analyze 1 rinsate sample per drum washer and containment for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample				
	SVOCs @ \$359/sample				
	8 RCRA Metals @ \$110/sample				
	Total per sample cost	\$658	3	\$1,974	
- Analyze soil sample(s) from containment area for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample				
	SVOCs @ \$359/sample				
	8 RCRA Metals @ \$110/sample				
	Total per sample cost	\$658	2	\$1,316	
Activity 3.	Subtotal			\$7,547	

Hourly Rate Hours or or Unit Subtotal Cost Unit Charge Estimate

Category

### 4. DECONTAMINATE CONTAINER STORAGE AREA(S)

#### Assumptions:

- Decontamination shall consist of washing with a detergent water solution and rinsing with a high-pressure spray

Activity

- CSA(s) to remain in-place following closure
   Decontamination of CSA includes floor, curbi

<ul> <li>Decontamination of CSA includes floor, curbing and containment trenches</li> <li>Assumes 1 rinsate and 2 soil samples required per CSA. Actual number of soil samples will be based on engineer's inspection</li> </ul>	n.			
- CSA Containment Square Footage			Square Footage	
- CSA 1			1190	
- CSA 2			1275	
	Total CSA Square Footage	2	2465	
Prime Contractor Costs				
-Costs for oversight and engineers inspection included in Closure Certification Activity below				
- Collect Rinsate Samples (1 per CSA)				
Work Rate for Sampling (hours per sample)			0.5000	
Number of Samples			1	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	0.50	\$46
- Drilling for Soil Samples (2.5 in boring to 1 ft each)				
Work Rate for Drilling ( hours per foot)			0.3050	
Number of Feet (subslab sample depth $= 1$ foot each x number of samples)			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$146.29	0.61	\$89
- Collect Soil Samples				
Work Rate for Sampling (hours per sample)			0.5000	
Number of Samples			2	
Labor and equipment per work hour (PPE Level D)	Labor/equipment	\$91.88	1.00	\$92
Subcontractor Costs				
- Decontaminate CSA(s)				
Work Rate to Pressure Wash (hours per squure foot)			0.0405	
Total Area of Permitted CSA(s) to be decontaminated			2465	
Labor and equipment for CSA decon (PPE Level D)	Labor/equipment	\$65.77	100	\$6,566
Laboratory Subcontractor Costs				
<ul> <li>Analyze rinsate sample(s) from each CSA for VOCs, SVOCs and RCRA metals</li> </ul>	VOCs @ \$189/sample			
	SVOCs @ \$359/sample			
	8 RCRA Metals @ \$110/sample			
	Total per sample cost	\$658	1	\$658
- Analyze 2 soil sample(s) from each CSA for VOCs, SVOCs and RCRA metals	VOCs @ \$189/sample			
	SVOCs @ \$359/sample			

8 RCRA Metals @ \$110/sample Total per sample cost

\$658

2

\$1,316

\$8,540

Hourly Rate Hours or Subtotal or Unit Cost Unit Charge Estimate

Category

8 RCRA Metals @ \$110/sample

Total per sample cost

Activity 5. Subtotal

\$658

2

\$1,316

\$3,799

#### 5. DECONTAMINATE THE FLAMMABLE STORAGE SHELTER

#### Assumptions:

- Decontamination shall consist of washing with detergent/water solution and rinsing with high-pressure spray

Activity

- Flammable Materials structure and dock area will remain in place
- Assumes 1 rinsate sample required to leave in place - Assumes 2 soil samples required from beneath containment area. Actual number of samples will be based on engineer's inspection - Square footage used for decontamination includes dock, structure and containment Square Footage 600 Prime Contractor Costs -Costs for oversight and engineers inspection included in Closure Certification Activity below - Collect Rinsate Samples (1 per Flam Shed) Work Rate for Sampling ( hours per sample) 0.5000 Number of Samples Labor and equipment per work hour (PPE Level D) Labor/equipment \$91.88 0.50 \$46 - Drilling for Soil Samples (2.5 in boring to 1 ft each) Work Rate for Drilling (hours per foot) 0.3050 Number of Feet (subslab sample depth = 1 foot each x number of samples) Labor and equipment per work hour (PPE Level D) \$146.29 0.61 \$89 Labor/equipment - Collect Soil Samples Work Rate for Sampling (hours per sample) 0.5000 Number of Samples Labor and equipment per work hour (PPE Level D) Labor/equipment \$91.88 1.00 \$92 Subcontractor Costs - Decontaminate structure, grating and containment 0.0405 Work Rate to Pressure Wash (hours per square foot) Total Area of Permitted Flam Shed to be decontaminated 600 Labor and equipment for CSA decon (PPE Level D) \$65.77 24 \$1,598 Labor/equipment <u>Laboratory Subcontractor Costs</u> - Analyze rinsate sample(s) from each shelter for VOCs, SVOCs and RCRA metals VOCs @ \$189/sample SVOCs @ \$359/sample 8 RCRA Metals @ \$110/sample Total per sample cost \$658 \$658 VOCs @ \$189/sample - Analyze 2 soil sample(s) from each shelter for VOCs, SVOCs and RCRA metals SVOCs @ \$359/sample

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
6. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				
Assumptions:				
- Amount of decon wash water generated based on approximately 1.0 gal/sq ft for tank systems and other surface areas	s.			
Unit Description	Square Footage	Number Gallo		Number Drums
STORAGE TANK DECONTAMINATION	2,007	2007		37
DECONTAMINATE TANK CONTAINMENT	1,979	1979		36
DECONTAMINATE THE RETURN/FILL STATION	1,000	1000		19
DECONTAMINATE CONTAINER STORAGE AREA(S)	2,465	2465		45
DECONTAMINATE THE FLAMMABLE STORAGE SHELTER	600	600		11
PPE, CONSUMABLES, DEBRIS	NA	NA		5
- Purchase 55-gallon drums to containerize wash water	Drums @ \$83 each	\$83	153	\$13,969
Subcontractor Costs				
- Transfer drums to trucks				
Labor/Equipment (PPE Level D)	Labor/equipment per drum	\$3.57	153	\$546
- Transport drums to TSD for Treatment/Disposal				
Total Number of Trucks Required to Transport Drums (84 per truck max)			2	
Cost per mile =\$5.64/mile				
Mileage = 300 miles (Number in second column is 300 miles x number trucks)	Transport trailer(s) x 300 miles	\$5.64	600	\$3,384
Disposal/treatment cost (per drum - Average drum liquid cost)	TSD @ \$179/drum	\$179	148	\$26,492
Disposal/treatment cost for PPE drums (Average drum solid cost)	TSD @\$253/drum	\$253	5	\$1,265
Activity 6.	Subtotal			\$45,656

	Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
7.	CLOSURE CERTIFICATION				
	Assumptions:  - Cost Pro unit rate per unit to be closed is \$4,118  - Unit rate includes engineer inspection and decontamination oversight of each unit				
	Prime Contractor Costs - Oversee and certify closure per unit times number of units	Project Manager/Engineer	\$4,118	6	\$24,708
	Ac	ctivity 7. Subtotal			\$24,708

Activity	Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal Cost
COST ESTIMATE ACTIVITIES SUMMARY				
1. INVENTORY REMOVAL				\$64,516
2. STORAGE TANK DECONTAMINATION				\$16,079
3. DECONTAMINATE THE RETURN/FILL STATION				\$7,547
4. DECONTAMINATE CONTAINER STORAGE AREA(S)				\$8,540
5. DECONTAMINATE THE FLAMMABLE STORAGE SHELTER				\$3,799
6. CONTAINERIZE, STAGE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES				\$45,656
7. CLOSURE CERTIFICATION				\$24,708
TOTAL CLOSURE COST ESTIMATE				\$170,845
TOTAL CLOSURE COST ESTIMATE ADJUSTED FOR INFLATION 2009 TO PRESENT				\$232,619
CONTINGENCY				20%
TOTAL CLOSURE COST WITH CONTINGENCY				\$279,143
7. CLOSURE CERTIFICATION  TOTAL CLOSURE COST ESTIMATE TOTAL CLOSURE COST ESTIMATE ADJUSTED FOR INFLATION 2009 TO PRESENT			_	\$24,708 \$170,845 \$232,619

#### Notes:

- Estimate assumes that waste management units are at permitted capacity at time of closure, which is the most expensive in the facility's operating life.
- All unit rates obtained from Cost Pro version 6.0, which is designed to be representative of 3rd party costs and includes the following:
- Transportation @ \$5.64/mile and 300 mile trip
- Disposal for bulk liquids \$1.67/gallon average Cost Pro bulk haz liquid
- Disposal for CSA liquids \$179/drum average Cost Pro drum haz liquid
- Disposal of decon wash water \$179/drum average Cost Pro haz liquid
- -Subcontractor Decontamination Rate for tanks and return/fill based on PPE Level C
- -Subcontractor decontamination rates for tank containment, CSAs and Flam Shed (if applicable) based on PPE Level D
- -Prime Contractor Rates based on hourly rate for rinsate sampling, drilling and soil sample collection
  -Lab subcontractor rates for analysis of rinsate and soil samples (Assumes VOCs, SVOCs and metals)
- -Closure Certification Activity includes contractor oversight, PE integrity inspections and reporting/Certification

# Exhibit H-3 Certificate of Liability Insurance



### VIA FEDERAL EXPRESS TRK #772829843184

July 24, 2023

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

RE:

Financial Assurance Insurance Policy Renewal and Annual Inflation Increase

Safety-Kleen Systems, Inc.

7528 New Castle Road, Oklahoma City

8800 SW 8<sup>th</sup> Street, Oklahoma City 16319 E. Marshall Street, Tulsa EPA ID No. OKD980878474

EPA ID No. OKD987086774

EPA ID No. OKD000763821

Dear Ms. Bartlett:

Please find enclosed three (3) original signed Certificates of Insurance for Closure and/or Post Closure Care issued by Great American Insurance Company. The renewed policy number is CPC E601049 03 and the policy is effective July 31, 2023 through July 31, 2024. In addition, the closure cost estimates have been increased for annual inflation.

The increases were calculated by multiplying the existing 2022 closure cost estimate by the annual inflation factor for Gross National Product 1.0698. This inflation factor was found on the DEQ website under the Solid Waste Annual inflation link (copy attached):

 $\underline{\text{https://www.deq.ok.gov/land-protection-division/waste-management/solid-waste/}}$ 

New Castle Road (Closure):

\$102,294 x 1.0698 = \$109,455

8<sup>th</sup> Street (Closure):

\$150,031 x 1.0698 = \$160,533

Tulsa (Closure):

\$149,215 x 1.0698 = \$159,660

If you have any questions regarding this submittal or require any additional information, please contact me at 219-746-5050 or at <a href="mailto:Harvey.Pamela@cleanharbors.com">Harvey.Pamela@cleanharbors.com</a>.

Sincerely,

Pamela K. Harvey, CHMM

Sr. Manager Environmental Compliance

**Enclosures** 



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

Name and Address of Insurer (herein called the "Insurer"):

Great American Insurance Company 301 E. 4<sup>th</sup> Street Cincinnati, OH 45202

Name and Address of Insured, (herein called the "Insured"):

Clean Harbors, Inc. 42 Longwater Drive Norwell, Massachusetts 02061

### FACILITIES COVERED:

Name:

Safety-Kleen Systems, Inc.

Address:

7528 New Castle Road Oklahoma City, OK 73169

EPA ID Number:

OKD 980 878 474

Closure:

\$109,455

Face Amount:

\$429,648

Policy Number:

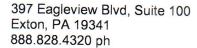
CPC E601049 03

Effective Date:

July 31, 2023

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d) as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ), the Insurer agrees to furnish to the DEQ Executive Director a duplicate original of the policy listed above, including all endorsements thereon.





I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e), United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulations were constituted on the date shown immediately below.

(Authorized signature for Insurer)

Rick Ringenwald

(Name of person signing)

Divisional Vice President, Executive Underwriter

(Title of person signing)

(Signature of witness or notary)

(Date)

SEAL:

Commonwealth of Pennsylvania - Notary Seal Christal Dove, Notary Public Chester County

My commission expires September 29, 2026 Commission number 1425572

Member, Pennsylvania Association of Notaries



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

Name and Address of Insurer (herein called the "Insurer"):

Great American Insurance Company 301 E. 4<sup>th</sup> Street Cincinnati, OH 45202

Name and Address of Insured, (herein called the "Insured"):

Clean Harbors, Inc. 42 Longwater Drive Norwell, Massachusetts 02061

### **FACILITIES COVERED:**

Name:

Safety-Kleen Systems, Inc.

Address:

8800 SW 8th Street

Oklahoma City, OK 73128

EPA ID Number:

OKD 987 086 774

Closure:

\$160,533

Face Amount:

\$429,648

Policy Number:

CPC E601049 03

Effective Date:

July 31, 2023

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

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/W///nu/
(Authorized signature for Insurer)
Rick Ringenwald (Name of person signing)
Divisional Vice President, Executive Underwriter
Title of person signing)
Christal Dive
Signature of witness or notary)
7/11/2023
Date)

Commonwealth of Pennsylvania - Notary Seal Christal Dove, Notary Public Chester County My commission expires September 29, 2026 Commission number 1425572 Member, Pennsylvania Association of Notaries

Page 2

SEAL:



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

Name and Address of Insurer (herein called the "Insurer"):

Great American Insurance Company 301 E. 4<sup>th</sup> Street Cincinnati, OH 45202

Name and Address of Insured, (herein called the "Insured"):

Clean Harbors, Inc. 42 Longwater Drive Norwell, Massachusetts 02061

### FACILITIES COVERED:

Name:

Safety-Kleen Systems, Inc.

Address:

16319 E. Marshall St.

Tulsa, OK 74116

EPA ID Number:

OKD 000 763 821

Closure:

\$159,660

Face Amount:

\$429.648

Policy Number:

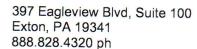
CPC E601049 03

Effective Date:

July 31, 2023

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d) as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ), the Insurer agrees to furnish to the DEQ Executive Director a duplicate original of the policy listed above, including all endorsements thereon.





I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e), United States Environmental Protection Agency approved amendment, for the State of Oklahoma, as such regulations were constituted on the date shown immediately below.

(Authorized signature for Insurer)

Rick Ringenwald
(Name of person signing)

Divisional Vice President, Executive Underwriter
(Title of person signing)

(Signature of witness or notary)

(Date)

SEAL:

Commonwealth of Pennsylvania - Notary Seal Christal Dove, Notary Public Chester County My commission expires September 29, 2026 Commission number 1425572

Member, Pennsylvania Association of Notaries

The following charts identify the annual inflation adjustments to be applied to solid waste disposal facility closure and post-closure cost estimates.

# IMPLICIT PRICE DEFLATOR GROSS DOMESTIC PRODUCT

(Updated January 31st of each year)

Year	]		Inflation
1998	1997 IPD = 101.95	1996 IPD = 100.00	1.95%
1999	1998 IPD = 103.22	1997 IPD = 101.95	1.25%
2000	1999 IPD = 104.77	1998  IPD = 103.22	1.50%
2001	2000  IPD = 106.92	1999 IPD = 104.77	2.05%
2002	2001  IPD = 109.23	2000  IPD = 106.92	2.16%
2003	2002  IPD = 110.66	2001  IPD = 109.23	1.31%
20041	2003 IPD = 105.643	2002 IPD = 103.945	1.63%
2005	2004 IPD = 108.220	2003 IPD = 105.643	2.44%
2006	2005 IPD = 112.113	2004 IPD = 108.220	3.60%
2007	2006 IPD = 116.034	2005 IPD = 112.737	2.93 %
2008	2007 IPD = 119.674	2006 IPD = 116,567	2.66 %
2009	2008 IPD = 122.357	2007 IPD = 119.816	2.12%
2010	2009  IPD = 109.777	2008 IPD = 108.483	1.19%
2011	2010  IPD = 110.654	2009 IPD = 109.615	0.95%
2012	2011  IPD = 113.327	2010 IPD = 110.992	2.10%
2013	2012  IPD = 115.360	2011 IPD = 113.359	1.76%
2014	2013  IPD = 106.570	2012 IPD = 105.002	1.49%
2015	2014  IPD = 108.272	2013 IPD = 106.733	1.44%
2016	2015  IPD = 109.767	2014 IPD = 108.686	0.99%
2017	2016  IPD = 111.446	2015 IPD = 109.998	1.32%
2018	2017  IPD = 113.422	2016 IPD = 111.416	1.02%
2019	2018  IPD = 110.389	2017 IPD = 107.948	2.26%
2020	2019  IPD = 112.355	2018 IPD = 110.420	1.75%
2021	2020  IPD = 113.626	2019 IPD = 112.265	1.21%
2022	2021 IPD = 118.357	2020 IPD = 113.648	4.14 %
2023	2022 IPD = 127.192	2021 IPD = 118.895	6.98 %

# IMPLICIT PRICE DEFLATOR GROSS NATIONAL PRODUCT

(Updated March 31st of each year)

Year			Inflation
1998	1997 IPD = 101.93	1996  IPD = 100.00	1.93%
1999	1998  IPD = 103.19	1997 IPD = 101.93	1.24%
2000	1999  IPD = 104.77	1998 IPD = 103.19	1.53%
2001	2000  IPD = 106.89	1999 IPD = 104.73	2.06%
2002	2001 IPD = 109.21	2000 IPD = 106.89	2.17%
2003	2002  IPD = 110.63	2001 IPD = 109.21	1.30%
20041	2003 IPD = 105.671	2002 IPD = 103.932	1.67%
2005	2004  IPD = 109.091	2003 IPD =106.299	2.63%
2006	2005 IPD =112.129	2004 IPD = 109.091	2.78%
2007	2006  IPD = 116.036	2005 IPD = 112.726	2.94%
2008	2007 IPD = 119.656	2006 IPD = 116.558	2.66 %
2009	2008  IPD = 122.407	2007 IPD = 119.813	2.17%
2010	2009  IPD = 109.764	2008 IPD = 108.486	1.18%
2011	2010  IPD = 110.654	2009 IPD = 109.609	0.95%
2012	2011 IPD = 113.347	2010 IPD = 110.971	2.14%
2013	2012  IPD = 115.387	2011 IPD = 113.353	1.79%
2014	2013  IPD = 106.710	2012 IPD = 105.126	1.51%
2015	2014  IPD = 108.407	2013 IPD = 106.854	1.45%
2016	2015  IPD = 109.868	2014 IPD = 108.800	0.98%
2017	2016  IPD = 111.528	2015 IPD = 110.090	1.31%
2018	2017  IPD = 113.500	2016 IPD = 111.509	1.79 %
2019	2018  IPD = 110.308	2017 IPD = 107.903	2.23%
2020	2019 IPD = 112.257	2018 IPD = 110.320	1.76%
2021	2020 IPD = 113.586	2019 IPD = 112.227	1.21%
2022	2021 IPD = 118.349	2020 IPD = 113.636	4.15%
2023	2022 IPD = 127.194	2021 IPD = 118.871	7.00%

Information for tables obtained from Bureau of Economic Analysis
Table 1.1.9 at

https://apps.bea.gov/iTable/?reqid=19&step=2&isuri=1&categories=survey#

<sup>1</sup>In 2004, the Bureau of Economic Analysis revised its indexing and set the baseline index at 100 for the year 2000. Previous implicit price deflators were based on a baseline index of 100 for the year 1996.



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

### VIA FEDERAL EXPRESS TRK #773907022991

October 30, 2023

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

### RE: Hazardous Waste Facility Liability Insurance

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

Dear Ms. Bartlett:

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

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

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

Sincerely,

Pamela K. Harvey, CHMM

Sr. Manager Environmental Compliance

Enclosures



- 1. Great American Insurance Company, the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Clean Harbors, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID#OKD 065438376 Clean Harbors Lone Mountain, LLC 40355 S. County Road 236, Waynoka, OK 73860, for sudden and nonsudden accidental occurrences. The limits of liability are \$5,000,000 each occurrence, and \$10,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 032 issued on November 1, 2023. The effective date of said policy is November 1, 2023.
- 2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.
  - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
  - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
  - (c) Whenever requested by a Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director.
  - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director.

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

(Signature of Authorized Representative of Incurery

Date

14/2027

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

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



- 1. Great American Insurance Company, the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Clean Harbors, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID#OK 0000070136 Clean Harbors Lone Mountain, LLC, ¼ mile East of Avard on County Road 76-22c, Avard, OK 73717, for sudden and nonsudden accidental occurrences. The limits of liability are \$5,000,000 each occurrence, and \$10,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 03 issued on November 1, 2023. The effective date of said policy is November 1, 2023.
- 2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.
  - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
  - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy. with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
  - (c) Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director.
  - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director.

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

Signature of Authorized Representative of Insurer)

Date:

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

Boston, MA 02116



- 1. Great American Insurance Company. the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Clean Harbors, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID#OKD000632737 Tulsa Disposal, LLC 5354 W 46th Street South, Tulsa, OK 74107, for sudden and nonsudden accidental occurrences. The limits of liability are \$5,000,000 each occurrence, and \$10,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 03 issued on November 1, 2023. The effective date of said policy is November 1, 2023.
- 2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.
  - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
  - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
  - (c) Whenever requested by a Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director.
  - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director.

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

(Signature of Authorized Representative of Insurer)

Date:

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

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



- 1. Great American Insurance Company, the Insurer, of 301 E 4th St, Cincinnati, OH 45202, hereby certifies that it has issued liability insurance covering bodily injury and property damage to Safety-Kleen Systems, Inc., the Insured, of 42 Longwater Drive, Norwell, MA 02061 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA ID# SEE ATTACHED LIST for sudden accidental occurrences. The limits of liability are \$2,000,000 each occurrence, and \$2,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PRE E603235 03 issued on November 1, 2023. The effective date of said policy is November 1, 2023.
- 2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.
  - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
  - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy. with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
  - (c) Whenever requested by the Executive Director of the Oklahoma Department of Environmental Quality (DEQ) the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.
  - (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director.
  - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director.

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

(Signature of Authorized Representative of Insurer)

Date:

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

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



### SAFETY-KLEEN SYSTEMS, INC. LOCATIONS

### STATE OF OKLAHOMA

7528 New Castle Road Oklahoma City, OK 73169

OKD980878474

26 N.E. 9<sup>th</sup> Street Oklahoma City, OK 73104

OKD018775469

8800 SW 8<sup>th</sup> Oklahoma City, OK 73128

OKD987086774

5550 E. Channel Road Port of Catoosa, OK 74015

OKD982558207

16319 E. Marshall Street Tulsa, OK 74116

OKD000763821