FACILITY DESCRIPTION

ABSTRACT

Corporate Headquarters:	Safety-Kleen Systems, Inc. 42 Longwater Drive Norwell, MA 02061
Responsible Official:	Boz Cannon Branch Manager
Facility Address:	Safety-Kleen Systems, Inc. 16319 East Marshall St Tulsa, OK 74116
Telephone Number:	918-234-5185
U.S. EPA Identification Number:	OKD 000 763 821
Geographic Location:	36° 10’ 22.7” N 95° 47’ 42.5” W Rogers County
Landowners:	Safety-Kleen Systems, Inc. 42 Longwater Drive Norwell, MA 02061
Date Operations Began:	January 1, 1978
Description of Activities:	This facility is a collection point for many spent materials generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately transported to a Safety-Kleen recycling facility or other properly permitted facility for processing.
Property Description:	Approximately 3.2 acres with the following structures: a. Two buildings with offices and warehouses for container storage; b. One tank farm with three aboveground storage tanks (two contain spent parts washer solvent,

and one contains clean product parts washer solvent)

c. A permitted metal shelter used for container storage
d. One loading dock with a return and fill station

Facility Type: Storage in an above ground tanks (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (gallons)	SECONDARY CONTAINMENT (gallons)	MATERIAL TO BE STORED
Container Storage Area (West Warehouse)	4,464	3,416	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) [1] Spent Aqueous Brake Cleaning Solution (D039) [1] Drum Washer / Dumpster Sediment (D001) [1] Spent Immersion Cleaner (D006) [1] Dry Cleaning Waste (D001 or F002) [31] Paint Waste (D001, F003, F005) [1] Photographic Imaging Waste (D011) [1] Contaminated Debris (F002, F003, F005) [2]
Container Storage Area (East Warehouse)	6,912	4,076	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) [1] Spent Aqueous Brake Cleaning Solution (D039) [1] Drum Washer / Dumpster Sediment (D001) [1] Spent Immersion Cleaner (D006) [1]

			Dry Cleaning Waste (D001 or F002) [1] Paint Waste (D001, F003, F005) [1] Photographic Imaging Waste (D011) [1] Contaminated Debris (F002, F003, F005) [2]
Container Storage Area (Metal Shelter)	2,184	1,122	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) [1] Spent Aqueous Brake Cleaning Solution (D039) [1] Drum Washer / Dumpster Sediment (D001) [1] Spent Immersion Cleaner (D006) [1] Dry Cleaning Waste (D001 or F002) [1] Paint Waste (D001, F003, F005) [1] Photographic Imaging Waste (D011) [1] Contaminated Debris (F002, F003, F005) [2]
Tanks	16,000	17,110	Spent Parts Washer Solvent and Spent Aqueous Parts Washer Solution (D001) [1] Spent Aqueous Brake Cleaning Solution (D001)[1]

[1] In addition to the code(s) listed above, these waste codes may be applicable:
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

[2] In addition to the code(s) listed above, these codes may be applicable:
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

1.0 FACILITY DESCRIPTION [40 CFR 270.14(b)(1)]

1.1 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Systems, Inc. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance, and dry cleaning services. The company has been operating since 1968, offering solvent collection and reclamation services for its customers, most of whom generate less than 1,000 kilograms (2,200 pounds) of hazardous waste per month. Safety-Kleen is a leading provider of containerized waste services, vacuum services, total project management and other environmental services to a wide array of customers in the automotive, metalworking, manufacturing, and other end markets.

The Tulsa Service Center typically operates Monday through Friday, from 7 a.m. to approximately 6 p.m. The Branch General Manager is responsible for the facility's operations. In the event of his/her absence, qualified personnel will assume the responsibility.

Currently, the Tulsa Service Center offers several services that involve the accumulation, transfer and storage of spent materials. These materials are transported from the Service Center to one of the Safety-Kleen recycle centers or an independent reclaimer. The following sections contain a description of each of these services.

Appendix A-1 includes the Landowner Notification Affidavit required by OAC 252:4-7-13(b).

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service, which remains the primary business activity. This service involves the leasing of degreasing units, which consist of a reservoir and a degreasing area. The reservoir contains a degreaser such as petroleum naphtha solvent, immersion cleaner solvent, or aqueous cleaner. On a regularly scheduled basis, a Safety-Kleen representative cleans and inspects the parts cleaner unit and replaces the reservoir of spent material with clean (most often recycled) product.

The Safety-Kleen representative then transports the parts cleaning solution back to the Tulsa Service Center. The spent petroleum naphtha solvent is transferred from the containers to storage tanks and containers of product are prepared for the next day's services. Used cleaning solutions may also be transferred to the facility's container storage areas. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the spent

solvent at the Service Center. Approximately two-thirds of the solvent used by Safety-Kleen customers is reclaimed with the remainder being purchased from a vendor.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service (COMS), provides a material reclamation service to these customers regardless of machine model.

A second type of parts cleaner, the immersion cleaner machine, removes varnish and gum from such equipment as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a container containing a non-halogenated hydrocarbon mixture. The spent material remains in the container after delivery to the Service Center, where it is stored in the container storage areas (CSAs) in the warehouse. Periodically, a box trailer truck is dispatched to deliver containers of fresh solvent and collect the containers of spent solvent for reclamation.

A unique feature of this system is that Safety-Kleen provides a “closed loop” system for the recycling of spent solvents. Safety-Kleen delivers clean recycled solvent to the customer and picks up the spent solvent, and transports the spent solvent to Safety-Kleen Recycle Centers where it is distilled into recycled solvent. The recycled solvent or virgin solvent is provided to the customer as part of a machine lease agreement or as part of a COMS service agreement.

A third type of parts cleaner service is available from Safety-Kleen, which utilizes an aqueous cleaning solution. The aqueous parts cleaning units are similar to the petroleum naphtha solvent-based units. On a regularly scheduled basis, a Safety-Kleen representative cleans and inspects the parts cleaner unit and replaces spent material with clean product. A Safety-Kleen representative collects the containers of spent material and stores them in a contained area at the Service Center. Periodically, a box trailer truck is dispatched to deliver containers of fresh solvent and collect the containers of spent solvent.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents. These wastes are containerized on the customers’ premises and are periodically collected by a Safety-Kleen representative. The containerized waste is accumulated in a contained area of the warehouse prior to transport to a Safety-Kleen accumulation center, recycle center, or other permitted facility.

1.1.3 Paint Waste Collection Service

In 1986, Safety-Kleen initiated a paint waste reclamation program to service the automobile body repair business. Paint gun cleaning machines are leased to customers with a reservoir of lacquer thinner. On a periodic basis the reservoir is replaced and the spent thinner is transported back to the Tulsa Service Center for shipment to a reclamation facility. Wastes containing various thinners and paints are also collected in containers on the customers' premises. A Safety-Kleen representative collects these containers and stores them in the CSAs at the facility. These wastes are transported to a Safety-Kleen Recycle Center or other reclamation facility and the regenerated solvent is distributed to Safety-Kleen customers for use as a product.

1.1.4 Aqueous Cleaning Solution

Spent aqueous cleaning solution is a by-product of brake and/or parts cleaning operations involving aqueous-based cleaners. Based on Safety-Kleen's experience, a small percentage of the cleaning solution may be contaminated from sprays used in shops which have not all together eliminated the use of chlorinated solvents. Although only a small percentage of spent aqueous cleaning solution will be contaminated with solvents, Safety-Kleen considers it prudent to manage spent aqueous cleaning solution as hazardous, unless the generator has analytical data to prove otherwise or generator knowledge that he/she does not use chlorinated solvents in their operations.

Depending on transportation options, Safety-Kleen may choose to ship the containerized aqueous cleaning solution in its original container, commingle the spent aqueous cleaning solution with the spent parts washer cleaning solvent solution in the return and fill drum washer/dumpster unit, or commingle the spent aqueous cleaning solution with other aqueous cleaning solutions. If commingled with spent parts washer solvent solution, this material is then transferred and stored in the facility's bulk waste storage tanks. The commingled solution is shipped via a tanker truck to a recycling facility in the same manner as spent parts washer cleaning solution. Empty containers are rinsed and the rinsate is managed as facility-generated waste. If the aqueous solution is commingled with other aqueous solution, the commingled solution is shipped to a recycling facility.

1.1.5 Photographic Imaging Waste Collection Service

In 1994, Safety-Kleen began offering a photographic waste reclamation program to the medical and dental service industries and photo-imagining facilities. In addition, Safety-Kleen offers a metal replacement unit with two self-contained cartridges in series for silver-bearing wastes. The unit

is serviced on a regularly scheduled basis by a Safety-Kleen representative who cleans and inspects the unit and replaces the self-contained cartridges with new ones. Wastes containing solution and film negatives are collected in containers on the customer's premises. The Safety-Kleen representative collects these containers and transports them to the facility. The wastes are shipped to a metal reclaimer for precious metal reclamation.

1.1.6 Oil and Oily Water

Used oil and oily water is collected at customer locations in containers. The containers are transported back to the Tulsa Service Center and stored in the CSAs for future shipment to a Safety-Kleen recycle center.

1.1.7 Transfer Wastes

Safety-Kleen may also manage other industrial wastes such as solvents, debris, spill cleanup, plating wastes etc., which may be hazardous. These wastes are shipped from the generator to the Tulsa Service Center in various DOT-approved containers. These wastes are managed at the service center on a transfer (10-day) basis.

1.1.8 Household Hazardous Waste

Safety-Kleen also offers a service for the collection of household hazardous waste. The containers are transported back to the Tulsa Service Center and are stored in the CSAs for future shipment to a Safety-Kleen recycle center.

1.2 DESCRIPTION OF THE FACILITY [40 CFR 270.14(b)(1)]

The Tulsa Service Center has been operating as a storage facility since January 1, 1978. The facility consists of the following structures:

a. A 3,853 square foot warehouse with offices and a contained area for container storage (west warehouse)

b. A 7,650 square foot warehouse with offices and a contained area for container storage (east warehouse)

c. A 300 square foot enclosed metal shelter used for container storage.

d. Three 8,000-gallon aboveground storage tanks. Two are used for spent parts washer solution/spent aqueous solutions. One is used to store the clean parts washer solution product.

e. A solvent return and fill station with a loading dock and two drum washer/dumpster units with a storage capacity of 162 gallons each.

Descriptions of the surrounding area and of waste management practices at the Tulsa Service Center follow.

Applicable maps and facility drawings are in Appendix C.

1.2.1 Solid Waste Management Units

The five solid waste management units associated with this facility are the two container storage areas in the warehouses (west and east), the metal storage building, the solvent return and fill station, and the tank farm. The units are used for storage in tanks (S02) and containers (S01). The location of the units, general dimensions and structural descriptions can be found in the associated maps located in Appendix C. The units have been in service at the location since January 1, 1978. Wastes managed in the units can be found in the Facility Description Abstract. There have been no releases at this facility from one of the SWMUs, but in the event of a release from one of the SWMUs, available information pertaining to the release of hazardous waste would be provided to the DEQ.

1.2.2 Regional Description

The Tulsa Service Center is located in Rogers County, Oklahoma approximately 625 feet east of the intersection of Marshall Street and 161st East Avenue. This area is zoned for light industrial use. To the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may be in conflict with Safety-Kleen's operations at this site.

Rogers County covers approximately 675 square miles. The City of Tulsa has a population of approximately 689,000 (2023). Rogers County is part of the Tulsa metropolitan area and is an urban/suburban area. Rogers County has a temperate, continental climate of the moist, subtropical type. The average summer (June-August) high temperatures range between 88 and 93°F. Winds from the south bring warm air and high humidity, but not high precipitation rates. Average summer

months' rainfall is approximately 4 inches. Average total annual precipitation is 39 inches with 9 inches of that being snow. The average winter (December-February) high temperatures range between 47 and 53°F. Average winter lows range between 26 and 31˚F. The area's climate is described as "temperate", meaning there are marked seasonal contrasts in temperature and precipitation and with occasional extremes in both temperature and precipitation. Tornadoes and damaging hailstorms are relatively common in the county. The Service Center is located above the 100-year floodplain.

The surface geology of the Tulsa Service Center consists of Claremore silt loam soil which was formed under prairie grasses on limestone uplands. This soil consists of shallow, well-drained, moderately permeable, gently sloping (0-3%) soils. Overburden is approximately 1.5 feet thick in the area of the service center. The Tulsa Service Center is about 760 feet above sea level and the property slopes towards the southwest. Surface runoff is to Mingo Creek which is about 3.5 miles west of the site. Wetlands exist within ¼ mile east of the Tulsa Service Center. There are no sanitary or storm sewers serving the facility. Domestic sewage collects in a septic tank and surface water is transported by way of ditches adjacent to Marshall Street.

The water table in this area is typically greater than 6 feet below the land surface. There is no significant aquifer in the immediate vicinity of the service center. Most wells in the area yield only a fraction of a gallon to a few gallons per minute. Surface runoff is collected in reservoirs and stored for use. The nearest reservoir to the Tulsa Service Center is approximately 20 miles north of the facility. The water supply of the Tulsa Service Center is from a water main supplied by the City of Tulsa.

None of the following exist within ¼ mile of the facility:

- Public water supply wells
- Schools
- Parks
- Critical habitats
- Oil or gas wells

The non-building areas of the facility are paved with concrete or gravel, as noted on the site plan in Appendix C. The majority of the vehicular traffic and loading/unloading operations occur at or near the return and fill station and at or near the entrances to the warehouses (west and east) all of these areas are paved with concrete. The entrance to the facility is on Marshall Street and is 625 feet east of the intersection of 161st East Avenue and Marshall Street. Interstate 44, running east-west in the region, serves as the major access road to the Tulsa Service Center. Safety-Kleen vehicular traffic exits at 161st East Avenue and travels north approximately 0.5 mile to Marshall Street. The access

road was designed in accordance with engineering criteria appropriate for sustaining traffic volume in this area. This site is located in an industrial area with roads have a load-bearing capacity of 20,000 pounds per axle load, adequate for industrial users. The route trucks that travel the daily routes between the Service Center and customers use the two-lane approach driveway. The trucks dispatched from the Recycle and Accumulation Centers to deliver fresh materials/solvents, and pick up used solvents perform the activities at the aboveground tank area, at the return and fill area, or at the entrances to the warehouses.

The box trailers dispatched from the Recycle Centers pick up containers weekly from the Tulsa Service Center. This includes containers of spent parts washer solvent, immersion cleaner, dumpster sediment, dry cleaning waste, paint waste, photographic waste, aqueous cleaner waste, spent industrial fluids, and other transfer wastes. Service Center trucks exit the facility in the morning with containers of clean solvent and return at the end of the business day with containers of waste.

The tanker trucks which serve the Tulsa Service Center typically use the east gate for both entry and exit to and from the facility (this may change if necessary and the tanker may enter/exit through the west gate also).

1.2.3 Waste Management Practices

The Tulsa Service Center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The CSA, aboveground storage tanks, and the return and fill all have secondary containment and the Service Center has the equipment necessary for employees to safely manage wastes onsite. Appendix C, Maps and Facility Drawings, contain drawings of the waste management facilities.

Proper handling of hazardous waste is ensured through proper training. Employees are trained on hazardous waste procedures during their initial training and then annually.

The CSAs in both warehouses and the metal shelter are for the storage of (1) spent parts washer solvent, (2) spent aqueous parts washer solvent, (3) spent aqueous brake cleaner, (4) drum washer/dumpster sediment, (5) spent immersion cleaner (6) dry cleaning wastes, (7) paint wastes, (8) photographic imaging wastes, (9) contaminated debris, and (10) transfer wastes. The wastes are stored in properly labeled containers to indicate their contents. These containers are inspected each operating day, typically Monday through Friday, to ensure they are properly labeled and that the 10-day transfer limit is not exceeded. Other materials and products which are not regulated may also be stored in this area.

The CSA in the west warehouse is a 1,140 square foot area (30' x 38') within a metal-framed building. It has secondary containment in the form of a diamond-plated steel liner with 6" x 4" steel-reinforced concrete curb and a trench. The dimensions of the trench are 12' x 2' x 2.5' with a total containment volume of 448 gallons. Total secondary containment (including the curbing and trench) is 3,416 gallons. No more than 4,464 gallons of waste materials will be stored in the CSA at any time.

The CSA in the east warehouse is a 600square foot area (20' x 30') within a metal-framed building with a steel-reinforced concrete floor. It has secondary containment in the form of a 6'' x 4" concrete curbing and two 12' x 2' x 2.5' trenches. Combined containment of the two trenches is 897 gallons. Total secondary containment (including curbing and trenches) is 4,076 gallons. No more than 6,912 gallons of waste will be stored in the CSA at any time.

The metal shelter drum storage area is a 300 square foot (20' x 15') free-standing building. It has secondary containment in the form of six 10' x 5' x 6" metal pans at its base and has a total containment volume of 1,122 gallons. No more than 2,184 gallons of waste materials will be stored in the building at any time.

Waste containers will be stored on pallets (where feasible) and adequate aisle space will be maintained in the CSAs. Containers will be moved with a forklift, pallet jack, or drum dolly.

At the Tulsa Service Center, spent parts cleaning solvents and spent aqueous solutions are accumulated in two 8,000-gallon aboveground storage tanks via the return and fill station. Containers of spent parts cleaning solvents and spent aqueous solutions are emptied into a drum washer/dumpster unit in the return and fill station. Material in the drum washer/dumpster is pumped into the spent solvent storage tanks. The return and fill station has secondary containment in the form of a 40' x 15' x 4" epoxy-coated concrete slab at its base with a total containment capacity of 1,495 gallons. The aboveground tanks have been designed in accordance with NFPA standards and are constructed of carbon steel and are designed to be compatible with the materials stored within them. The tanks' exteriors are painted a light color to reflect sunlight and minimize corrosion by protecting the steel. Any corrosion that may develop will be easily observed due to the light color of the paint.

The secondary containment for the solvent tank farm is a steel reinforced concrete slab and dike measuring approximately 41' x 30' x 2' with a secondary containment capacity of 17,110 gallons. There are three 8,000-gallon aboveground storage tanks located in the tank farm. Two are for spent parts washer solvent and one is for clean parts washer solution. Each tank is equipped with an audiovisual high-level alarm.

WASTE ANALYSIS PLAN ABSTRACT

WASTE DESCRIPTION	EPA WASTE CODES	ESTIMATED FACILITY CAPACITY[1]	ESTIMATED ANNUAL AMOUNT[2]
Spent Parts Washer Solvent	D001[3]	29,560[4,5]	1,431
Bottom Sediment from Waste Tanks	D001[3]	NA	Variable
Spent Immersion Cleaner	D006[3]	13,560[4]	37
Dry Cleaning Waste	D001 or F002[3]	13,560[4]	181
Paint Waste	D001, F003, and F005[3]	13,560[4]	94
Drum Washer/Dumpster Sediment	D001[3]	13,560[4]	69
Aqueous Brake Cleaner Solution	D039[3]	29,560[4,5]	35
Aqueous Parts Cleaning Solution	[3]	29,560[4,5]	39
Photographic Imaging Waste	D011[3]	13,560[4]	5
Contaminated Debris	F002, F003, F005[6]	13,560[4]	34

[1]The estimated facility capacity in gallons

[2]The estimated annual amount in thousands of gallons

[3]In addition to the code(s) listed above, these codes may be applicable: 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

[4]The total amount of containerized waste stored in the west warehouse will not exceed 4,464 gallons, the total amount stored in the east warehouse will not exceed 6,912 gallons, and the total amount stored in the metal shelter will not exceed 2,184 gallons

[5]The total amount of spent parts washer solvent and spent aqueous solution stored in the waste tanks will not exceed a maximum of 16,000 gallons.

[6] In addition to the code(s) listed above, these codes may be applicable: 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

2.0 WASTE ANALYSIS PLAN [40 CFR 270.14(b)(3)]

2.1 DESCRIPTION OF WASTES

Several types of waste result from the servicing of Safety-Kleen customers and maintenance of the facility. Descriptions of these wastes are as follows:

2.1.1 Wastes Resulting from the Parts Washer Service

Spent parts washer cleaning solvent and spent aqueous solutions are accumulated in two 8,000-gallon aboveground storage tanks via the return and fill station. Containers of parts washer waste are emptied into the drum washer in the return and fill station, which in turn, empties into the tanks. Additionally, parts washer wastes may also be managed in containers. This waste handling method results in the following types of parts washer solvent waste:

a. Spent Parts Cleaning Solvents and Spent Aqueous Solutions: The spent parts cleaner solvent is removed from the tank by a tanker truck on a varying schedule. This waste is ignitable (D001) and may exhibit the toxicity characteristics: 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. The spent parts washer waste will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

b. Bottom Sediment in the Tanks: Periodically, it is necessary to remove sediment and other heavy material from the bottom of the tanks. A vacuum truck is typically used for this purpose. The sediment may be ignitable (D001) and may exhibit the toxicity characteristics: 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. This waste is transported to a Safety-Kleen Recycle Center or other properly permitted facility.

c. Dumpster Washer/Dumpster Sediment: Sediment also accumulates in the bottom of the drum washer in the return and fill station. This sediment is typically removed manually with shovels or scoops. It is placed in a satellite accumulation container in the return and fill area and moved to a container storage area once full. The chemical composition of this waste is analogous to that of the bottom sediment from the tank. This waste sediment will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

d. Spent Immersion Cleaner: This waste remains in the container in which it was originally used until it is received at the recycle center. The immersion cleaner may exhibit the toxicity characteristics: 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. The waste immersion cleaner will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

e. Aqueous Brake Cleaner Waste: This waste may be placed into the spent parts cleaner tanks, bulked onsite into larger DOT-approved containers and stored in any of the CSAs, or remain in the container in which it was originally used/transported until it is received at the Recycle Center. The aqueous parts cleaner waste may exhibit the following toxicity characteristics: 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. This waste will be transported to a Safety-Kleen Recycle Center or other properly permitted facility.

2.1.2 Wastes Resulting from Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, separator water, powder residue from diatomaceous or other powder filter systems, still bottoms, and other dry cleaning solvent contaminated wastes. These wastes are packaged on the customer's premises in containers. While approximately 95 percent of the dry cleaning waste that customers generate is perchloroethylene waste (F002), the remaining generate waste that contains either mineral spirits/petroleum naphtha (D001), trichloro-trifluoroethane (F002), or 1,1,1-trichloroethylene (F002). The dry cleaning waste may exhibit the following toxicity characteristics: 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. The waste remains in the container in which it was originally packaged until it is received at a Safety-Kleen Recycle Center or other properly permitted facility. Mineral spirits and trichloro-trifluoroethane wastes are managed as transfer wastes at the facility.

2.1.3 Wastes Resulting from Paint Gun Cleaner Service

Paint wastes consist of various lacquer thinners such as acetone, isopropyl alcohol, methyl ethyl ketone, toluene, xylene and acetate compounds (D001, F003, and F005) and may also exhibit the following toxicity characteristics: 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. The wastes are packaged on the customer's premises. These containers may be stored in any or all of the CSAs. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

2.1.4 Photographic Imaging Waste Collection Service

Photographic imaging wastes consist of fixer and developer solutions, other associated photographic solutions and waste containing silver and film negatives. Photographic imaging wastes exhibit the toxicity characteristic D011. The wastes are packaged on the customer's premises. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

2.1.5 Contaminated Debris

Solid and liquid debris wastes are typically accumulated at the return and fill station and in the east and west warehouses, however, additional satellite contaminated debris drums may be found at various locations throughout the facility. Typically, wastes such as rags, wipes, gloves, sampling equipment, absorbents, etc. are placed in satellite containers. Once the satellite containers are full, they are moved to a CSA until shipped to a Safety-Kleen Recycle Center or other properly permitted facility. The contaminated debris may carry the following waste codes: 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.

2.2 QUALITY CONTROL PROCEDURES

Spent materials are the primary feedstock for the generation of Safety-Kleen recycled solvent products. As a result, quality control of the spent materials is necessary to monitor product quality and regulatory consistency. The Tulsa facility collects spent materials from thousands of customers, most of whom are small quantity generators, and containers containing recoverable solvents are returned to the Service Center for shipment to a Recycle Center or other permitted facility. With such large numbers of waste generators and waste shipments, performing detailed analyses at the facility is economically and logistically infeasible.

Most of the materials collected at the Service Center are managed in the closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known, and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the Service Centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

If Safety-Kleen has been notified or has a reason to believe that the process or operation generating the waste has changed, or when there is indication that the waste collected does not match that designated on the manifest or shipping document, the waste generation process will be further evaluated with the generator to determine acceptability. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

2.2.1 Parts Cleaner Service

Prior to leasing a parts cleaning machine or placing a COM (customer owned machine) service, the customer's business is reviewed. Where the possibility exists for contamination of the parts cleaner solvent (e.g., pesticide, herbicide or pharmaceutical operations), the process is reviewed to ensure that the solvent is protected from the sources of contamination. In reviewing a customer's business, the Safety-Kleen Representative provides parts washer customers with written and verbal information on use of the parts washer unit. This information will contain at a minimum:

- Proper usage and management of the unit
- Information on the reasons to not add materials to the unit, and examples of what not to add to the unit

Safety-Kleen conducts qualitative/visual analysis as a part of all parts washer and immersion cleaner services. Qualitative/visual analysis is not conducted on the dry cleaning and paint waste streams as these containers are not opened by the Safety-Kleen service representatives and the likelihood of contamination is remote.

Safety-Kleen Representatives are instructed to visually examine the spent solvents (parts washer and immersion cleaner) when the machines are serviced, noting the quantity, odor, and appearance of the material recovered as follows:

a. <u>The quantity of used solvent in the drum</u> – When the amount of parts cleaner solvent or immersion cleaner liquid is more than 25% greater than originally supplied, the

container will not be accepted. Contingent on the customer's responses to Safety-Kleen's inquiry regarding the customer's operation and handling practices, the solvent is accepted or left with the customer until a site specific profile is completed to determine its acceptability. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.

b. The odor of the liquid in the container – Personnel must never make an effort to "sniff" the solvent. However, if in the normal course of servicing the customer, the odor of the liquid in the container is noticed to be different from that of parts cleaner solvent or immersion cleaner the container will not be accepted. Contingent on the customer's responses to Safety-Kleen's inquiry regarding the customer's operation and handling practices, the solvent is accepted or left with the customer until a site specific profile is completed to determine its acceptability. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.

c. The appearance of the liquid in the drum – The spent parts cleaner solvents have a normally greenish-brown or black appearance. Certain contaminants containing dyes and color pigments (such as transmission fluid, printers' ink, and water-based paints) may change the color of the spent parts cleaner solvent to other colors. Spent immersion cleaner should have a dark brown to almost black appearance. If the liquids in the containers deviate from the above description or which contain substantial amounts of water, and/or high density solvent at the bottom will not be accepted. Contingent on the customer's responses to Safety-Kleen's inquiry regarding the customer's operation and handling practices, the solvent is accepted or left with the customer until a site specific profile is completed to determine its acceptability. Per 40 CFR 262.11(c), the generator may use generator knowledge and/or analysis to profile the non-conforming material.

It should be noted that tank bottoms waste and drum washer/dumpster sediment waste are generated as a result of processing parts washer waste. The safeguards outlined in 2.2.1 (a through c) ensure the waste streams remain consistent.

At the Service Center, the Safety-Kleen representative or the material handler again observes the quantity, odor, and appearance prior to emptying the parts cleaner solvent into the wet dumpster. If drums have questionable contents, the waste generation process will be further evaluated with the generator to determine its acceptability. All other containers (immersion cleaner,

aqueous parts cleaning solvent) are verified upon receipt at a Recycle Center. In addition, receipt analysis is performed by the Safety-Kleen Recycle Centers on all inbound bulk spent solvent deliveries; including a screen for atypical flash point, PCBs, and halogenated organics.

2.2.2 Dry Cleaner and Paint Waste Collection Service

The dry cleaner and paint wastes are collected from facilities where typically there is one process and the possibility of cross-contamination from other chemicals or wastes is minimal. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

2.2.3 Transfer Waste (also known as Containerized Waste Service)

Containerized Waste Service (CWS) are collected from primarily industrial customers. CWS wastes may include cleaning solvents, halogenated solvents (F001, F002, F004), acids and caustics (D002), lacquer thinners and paint wastes (D001, F003, F005), imaging wastes (D011), and various coolants. CWS wastes may exhibit any or all of the waste codes that are designated for Transfer Waste in the Waste Analysis Plan Abstract.

The service involves picking up containerized wastes from the generators and transporting them to the facility for storage. The containers are accumulated in the container storage areas of the facility prior to transport to a Safety-Kleen Accumulation Center, Recycle Center, or other properly permitted facility. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

2.2.4 Photographic Imaging Waste Collection Service

Photographic imaging wastes are the result of developing and fixing of photos. Wastes are collected from facilities where typically one process is managed and the possibility of cross-contamination from other wastes or chemicals is minimal. These wastes remain in the container in which they were originally packaged until received at a Safety-Kleen Recycle Center or other properly permitted facility.

Samples of this waste are collected at the Recycle Center or other properly permitted facility. The contents are either verified and accepted, or the container is rejected. Rejected wastes are either returned to the customer or properly disposed at an approved facility.

2.3 RECHARACTERIZATION OF WASTE STREAMS (QUALITATIVE ANALYSIS) [40 CFR 270.14(b)(2)]

After 50 years of servicing over 250,000 parts washer customers each year, Safety-Kleen has determined that the wastes generated by its customers are relatively homogeneous. The homogeneity of these wastes are evaluated annually through the Safety-Kleen Recharacterization Process (Quantitative Analysis).

Analytical data from the Recharacterization sampling is subjected to an EPA SW846 approved statistical model. The Safety-Kleen Tulsa facility is included each year as part of the Annual Recharacterization sampling.

Samples included in the Annual Recharacterization process are selected from random customers at selected Safety-Kleen facilities.

The waste streams collected by Safety-Kleen are uniform across business types and geographical locations. This is demonstrated by the minimal changes in the codes assigned to each stream through the Annual Recharacterization statistical evaluation each year. Homogeneity of the streams was further confirmed in 2004. In 2004, Safety-Kleen conducted an Annual Recharacterization using California customer data only. Safety-Kleen then conducted a statistical comparison of the 'California only' Annual Recharacterization result with the results from the National Annual Recharacterization (Exhibit D-3). Note the conclusion that California customer wastes are no different than the streams generated by Safety-Kleen customers in the rest of the country.

The waste streams included in the Safety-Kleen Recharacterization process are by their nature consistent and predictable. The process includes streams generated by Safety-Kleen customers and terminated as permitted streams at Safety-Kleen facilities as well as streams generated by Safety-Kleen facilities. Waste streams included in the Recharacterization process for 2024 were:

CUSTOMER GENERATED	SAFETY-KLEEN GENERATED
Immersion Cleaner	Spent Mineral Spirits Parts Washer Solvent Tank Bottoms (bulk)
Spent Mineral Spirits Parts Washer Solvent	Bulk Tank Spent Mineral Spirits Solvent
Paint Gun Cleaner/Paint Wastes	Spent Mineral Spirits Parts Washer Solvent Sludge/Drum Washer Mud

Dry Cleaning Related Streams (Perc and Naphtha, filters, bottoms, and separator water)	Branch Contaminated Debris

Final 2024 Annual Recharacterization (National) Waste Code Assignments are included in Exhibit D-2.

The purpose of the Recharacterization is to conduct a waste determination and to determine the waste codes applicable to core waste streams managed and generated by Safety-Kleen facilities. As such, a waste stream may be excluded from Recharacterization when it has been determined that the codes assigned to the stream are stable and marginal changes in trace constituents will not affect the management of the stream. Streams expected to be phased out of the Recharacterization program in coming years include the Dry Cleaning related streams and Paint Gun Cleaner/Paint Wastes streams. Lastly, a set of analytes may be omitted if they are not expected or demonstrated to not be present in a waste stream. Pesticides and herbicides have never been included in the Recharacterization process as these constituents are not allowed in wastes picked up by Safety-Kleen. Analysis for semivolatiles is in the process of being phased out as codes for semivolatiles have never been assigned.

Note: All samples pulled during the Recharacterization sampling event are identified by customer and date. If the analytical from a sample pulled during the Recharacterization process determines a customer's waste is non-conforming, that customer's waste will be excluded from the Safety-Kleen core waste program. Future pickups of waste from any non-conforming customer will be profiled and managed as 10-day transfer waste.

Details on the Statistical Method employed by Safety-Kleen for its Annual Recharacterization process are included in Exhibit D-1. As noted in this Exhibit, the Statistical method has been developed and is conducted in accordance with U.S. EPA SW846 Chapter 9 (September 1986) guidance on determining if a waste is hazardous. The Annual Recharacterization Sample Testing Protocol is located in Exhibit C-4.

2.4 WASTE ANALYSIS PLAN UPDATE [40 CFR 270.14(b)(3)]

This Waste Analysis Plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is the responsibility of the corporate Environmental Compliance Department.

2.5 LAND BAN NOTIFICATION / CERTIFICATION FORMS [40 CFR 268]

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfill disposal.

This notice is required paperwork for all Safety-Kleen waste types. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the Notice is kept in the files of the receiving/terminating facility.

2.6 SUBPART CC COMPLIANCE [40 CFR 264 SUBPART CC]

The Safety-Kleen Tulsa Service Center shall control air pollutant emissions for applicable hazardous waste management units at this facility pursuant to the requirements of RCRA Subpart CC, through implementation of this compliance program.

This plan describes this facility's waste determination procedures, tank and container design/management practices, organic emission controls, inspection and monitoring, and recordkeeping and reporting requirements, pursuant to standards promulgated under RCRA Subpart CC.

2.6.1 WASTE DETERMINATION PROCEDURES [40 CFR 264.1083(a)(1)]

Waste Determination

For purposes of waste determination, the facilities utilize knowledge developed in the Waste Characteristics portion of the sites' hazardous waste permit. On an annual basis, the waste streams are recharacterized by collecting small retain samples of each waste shipment arriving at a Safety-Kleen Recycle Center for a period of several weeks. Analyses are performed on composite samples, including flash point, pH, specific gravity, and TCLP (metals, volatiles, and semi-volatiles). Other analyses are performed throughout the year as necessary. In addition, the facility may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all hazardous waste managed in tanks or applicable containers at the facility may contain an average volatile organic concentration of greater than 500 ppmw at the point of waste generation. Therefore, all hazardous wastes managed in tanks or applicable containers shall be managed in accordance with applicable Subpart CC control

standards. Under such a management scenario, no direct measurements will be conducted. This is consistent with 40 CFR 264.1083(a).

Point of Waste Origination

The point of waste origination for all hazardous wastes generated from off-site sources and transported to a Safety-Kleen Service Center in DOT authorized containers, which will subsequently be managed in tanks or containers on-site, is the facility boundary at the entrance gate.

For hazardous waste generated on-site, the point of waste origination is the point of hazardous waste generation, as defined under hazardous waste regulations.

2.6.2 CONTAINER STANDARDS (40 CFR 264.1086)

Containers managing hazardous wastes generally fall into three categories.

1. Hazardous waste containers less than 26 gallons in capacity are wholly exempt from consideration under Subpart CC. Containers of hazardous wastes that are transferred through the facility are “still in the course of transportation” and therefore are exempt from Subpart CC.

2. Containers with capacities between 26 gallons and 122 gallons are all Level 1 containers. The Level 1 containers have covers that are designed with no gaps, holes, cracks, or other open spaces into the container. In addition, all containers used to handle hazardous waste meet U.S. DOT Performance Oriented Packaging Standards.

3. Containers of greater than 122 gallons that manage hazardous wastes at this facility are not in light service and are Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container.

Level 1 Containers [40 CFR 264.1086(c)]

Provided below is a summary of the criteria applicable for a container to be identified and managed as a Level 1 container.

Level	Volume	Usage	Requirements
Level 1	> 26 gallons but ≤ 122 gallons OR ➢ 122 gallons	Any hazardous waste Not "in light material service"	- Meet DOT specs or is a lab pack - Keep closed except when adding or removing waste - Safety relief devices - Minimize exposure of waste when transferring, - Remediate defective containers within 5 days, initiate within 24 hours

A hazardous waste is a "light material" if it (1) contains at least one organic constituent with a vapor pressure above 0.3 (kPa) at 20°C, and (2) has a total concentration of such constituents of 20% or greater by weight. This definition will generally apply to all hazardous waste received at the facility in non-bulk containers.

Level 1 containers typically received and managed by this facility include, but are not limited to include 30-gallon, 55-gallon, 250-gallon or 330-gallon containers. These containers meet applicable DOT specifications and/or authorizations. Therefore, these containers are acceptable for use in accordance with Level 1 controls. Containers greater than 26-gallons managing site generated hazardous waste will be visually inspected upon their initial filling and within one year if the container is not completely emptied of its contents.

2.6.2.1 Inspections [40 CFR 264.1086(c)(4)]

Hazardous Waste Received from Off-Site – All hazardous waste received from offsite sources are received in containers. All Level 1 containers managing hazardous waste subject to Subpart CC received from off-site sources that will not be completely emptied within 24 hours of receipt will be inspected to ensure that all applicable covers and closure devices are closed. This inspection already occurs as part of the daily facility inspection. Therefore, compliance with the inspection requirements of Subpart CC is incorporated in the facility inspection plan by this reference.

Defective containers will be remediated within 24 hours of observation, and initial remediation will be attempted within 12 hours of observation.

On-Site Generated Hazardous Waste – Containers greater than 26 gallons will be visually inspected upon their initial filling to ensure that all openings are properly closed and/or covered. Satellite accumulation containers managed in accordance with 40 CFR 262.15 are not subject to Subpart CC requirements.

2.6.2.2 Monitoring [40 CFR 264.1088]

Containers Managing Off-Site Hazardous Waste – Level 1 containers managed at the Service Center are not subject to monitoring for no detectable emissions (NDE). Therefore, no monitoring for NDE will be conducted on such containers. However, they will be closed when not involved in transfer activities.

2.6.2.3 Transferring Hazardous Waste [40 CFR 264.1086(c)(3)(i),(ii)]

Container To Container – This type of transfer will typically be done at the Service Center when it is necessary to remove waste from a damaged container to a non-damaged container that will provide containment for the waste, or to place the entire container into a larger container. An example would be placing a 55-gallon container into an 85-gallon salvage drum. This may occur for both liquid and solid wastes. Only container openings that are necessary to add or remove waste from each container will be open during the transfer. This activity will be conducted in accordance with 40 CFR 264.1086(c)(3)(ii) for Level 1 containers.

Container To Tank – This type of transfer involving liquids will be done regularly for Level 1 containers. Following is an explanation of this activity.

Spent mineral spirits from parts washers is accumulated in (2) 8,000-gallon aboveground storage tanks via the return and fill station. Typically, 16- and 30-gallon containers (and occasionally 55-gal) are poured into the dumpster in the return and fill station, and the material in the dumpster is pumped into the spent solvent storage tank. The return and fill station has secondary containment in the form of reinforced concrete slab and curbs.

2.6.3 TANK STANDARDS [40 CFR 264.1084]

Safety-Kleen will manage organic wastes at the Service Center in the waste mineral spirits storage tanks. The waste mineral spirits storage (WMSS) tanks will manage hazardous waste with 500 ppmw or greater VO Concentration. Therefore, these tanks are subject to Level 1 controls. Please note, there is one other storage tank at the Service Center, but it is not utilized to store hazardous waste and therefore is exempt from regulation under Subpart CC.

The WMSS tanks are non-pressurized, horizontal, aboveground storage tanks. They are constructed with a fixed roof and each is 21’ long and 8’ high. Each WMSS tank has an 8,000-gallon storage capacity. The tank is constructed of 3/16” thick (1/4” thick in the lower third of the tank)

carbon steel. The tank has an exterior coating of white paint. The tank is constructed in accordance with Underwriters Laboratories Standard 142. The waste in this tank exhibits a vapor pressure of less than 5.2 kPa (.75 psia). The measured vapor pressure of the waste managed in tanks is = 0.2 psia. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 265.1084(c)(4).

All of the tanks present at this Service Center are designed so that all opening covers can be closed with no visible gaps, holes, cracks, or other open spaces into the interior of the tank. The cover and all cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position at all times except when waste is being added to or removed from the tanks, or when necessary sampling or repair/maintenance is performed on the tanks.

The tanks are vented to the atmosphere through a safety device (pressure vacuum vent) which has been designed to operate with no detectable organic emissions when the device is in the closed position. These tanks are equipped with pressure vacuum vents that operate at 2oz of pressure and 1oz of vacuum. In addition, these tanks are designed with a man way pressure relief device which remains in the closed position when not in use to relieve pressure.

Below is a summary of the criteria that must be met in order for Safety-Kleen's hazardous waste tank to be subject to Level 1 controls.

Tank Design Capacity	Maximum Vapor Pressure of Waste
<19,789 Gallons	11.26 psi
>19,789 Gallons - < 39,841 Gallons	4.0 psi
≥39,841 Gallons	0.75 psi

2.6.3.1 Level 1 Tank [40 CFR 264.1084(c)]

The Level 1 tank must be managed with a fixed roof. All openings in the tank systems must be closed except when adding, removing, or conducting routine maintenance on the tanks. Safety devices and conservation vents are allowed on such tanks.

The WMSS tanks store waste mineral spirits. Vapor pressure testing performed on the product SK 150 Mineral Spirits showed the results as .004 psia at 68°F.

Since the material has a vapor pressure that is significantly lower than the maximum threshold of 11.26 psia for Level 1 tanks, Safety-Kleen Systems, Inc. has determined that the hazardous waste storage tanks at the Service Center has a design capacity of less than 19,789 gallons, therefore the waste materials are subject to Level 1 controls.

The vapor pressure of the waste in the tank will fluctuate on a periodic basis due to the cyclic generation of hazardous waste streams by off-site generators. The maximum vapor pressure in the hazardous waste tank will not exceed the applicable Level 1 threshold. The maximum organic vapor pressure is determined using process knowledge of the hazardous waste historically managed pursuant to 40 CFR 265.1084(c)(4).

2.6.4 CLOSED VENT SYSTEMS AND CONTROL DEVICES (40 CFR 264.1087)

This standard is not applicable because the hazardous waste management unit (i.e. tanks and containers) requiring such control equipment, in accordance with RCRA Subpart CC, are not managed at this facility.

2.6.5 INSPECTION AND MONITORING (40 CFR 264.1088)

Visual inspection of the tank closure devices will be conducted on an annual basis. In addition, the hazardous waste storage tanks are inspected during the facility's daily inspection. This daily inspection includes check of the high level alarm and of the volume (according to the gauge) held in the tank. Sudden deviations in the solvent volumes will be investigated and the cause determined. If necessary, repairs will be initiated immediately. The hazardous waste solvent must not exceed 95% of the tank volume at any time. The piping and secondary containment for tank is checked for leaks, cracks, or other deterioration. Any damage to the tank, piping (such as rust, seepage, or loose fixtures) must be noted and repairs initiated.

2.7 MISCELLANEOUS UNITS [40 CFR SUBPART X]

2.7.1 Summary

Safety-Kleen Systems, Inc. does not have any miscellaneous units on site, therefore this section does not apply.

PREPAREDNESS AND PREVENTION PLAN

ABSTRACT

SECURITY MEASURES: The site is secured as follows:

1. There is a chain link fence topped with 3 strands of barbed wire surrounding the facility.
2. Warning signs are posted at all entrances
3. Locks are on all entrances to the warehouse and on the metal shelter
4. Remote controls for all tank operations are located inside the west warehouse
5. There is nighttime outdoor lighting

INSPECTION PROCEDURES: See Appendix E for an example Facility Inspection Record

REQUIRED EQUIPMENT: The emergency equipment requirement is met with the following:

1. Internal communications will be by voice or phone
2. Telephones are available in the office and the warehouse
3. Fire extinguishers are available at numerous locations in the warehouse, office, tank farm, return and fill and metal shelter as indicated on the Emergency Equipment Plan in Appendix F
4. Water is available from the City of Tulsa for various uses throughout the facility (i.e., emergency eyewash and shower). Water for fire fighting is available from a nearby fire hydrant.
5. Spill containment equipment is available near storage and material handling areas.

3.0 PREPAREDNESS AND PREVENTION PLAN [40 CFR 264 SUBPART C]

3.1 SECURITY MEASURES [40 CFR 270.14(b)(4)]

The facility is secured with a six-foot-high chain link fence topped with 3 strands of barbed wire surrounding the facility. All access gates are locked when the facility is unoccupied. The facility has warning signs stating “Danger-Unauthorized Personnel Keep Out,” (or similar language) which are visible from twenty-five feet, posted at the entrances. In addition, outdoor lights are on at night.

The office/warehouse buildings are secured with locks on all outer doors, and warning signs are posted at all entrances to work and waste storage areas. The container waste storage areas are located in the warehouses (east and west) and metal shelter, which are locked during non-working hours. The tanks are inaccessible in that material can not be added or removed unless the pumps are activated, the controls for which, are located inside the west warehouse. The pumps are not activated unless parts cleaner solvent product or waste is being added to or removed from the tanks by Safety-Kleen personnel. As a result, the tank and container storage areas are inaccessible except by Safety-Kleen personnel.

3.2 INSPECTION PROCEDURES [40 CFR 270.14(b)(5)]

The Service Center Manager (i.e., the Branch General Manager) or his designate is responsible for carrying out and documenting the facility inspection. The inspection will be conducted by an employee familiar with facility operations and inspection procedures. This may be the Branch General Manager, a Material Handler (warehouse person), Branch Administrator, Sales Representative, or a Sales Manager. The inspector must make a record of the inspection in an inspection, note any repairs that are needed, and assure that they are completed. If he cannot carry out the repairs, he must notify the appropriate Safety-Kleen Corporate Department and request assistance. Completion of repairs also must be noted on the Facility Inspection Record. Records of inspections will be kept for three years from the date of inspection. See Appendix E for example inspection forms.

The facility inspections include the following:

a. Tank Inspections – At a minimum, the tanks holding product and spent materials are inspected each operating day, typically Monday through Friday. The inspections include checks of the high level alarm and of the volume held in each tank. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. The solvent waste must not exceed 95% of the volume at any time. The power to the high level alarm must be

checked each operating day; it will sound when the tank's volume is 95% of capacity. All storage tanks at this facility are equipped with high level alarm systems.

The piping and secondary containment for the tanks must be checked for cracks or other deterioration. Insulated piping will be visually inspected for evidence of leaks. Any damage to tanks and piping (such as rust or loose fixtures) or secondary containment must be noted and repairs initiated.

Annually the tank is inspected per 40 C.F.R. § 264.1084(c)(4)(ii) using the example inspection form provided in Appendix E. The condition of the tank (fixed roof and closure devices) are checked annually for, but not limited to, visible cracks, holes or gaps in the roof sections or between the roof and tank wall, cracked or damaged seals or gaskets on the closure device, broken, warped, or missing hatches, access covers, caps or other closure devices, gaps present between closure device and tank, vents obstructed, and other defects.

b. Solvent dispensing equipment – The solvent dispensing equipment is inspected each operating day, typically Monday through Friday. The solvent dispensing hose, connections, and valves must be inspected for damage (such as cracks or leaks) and proper functioning. The pumps, pipes, and fittings must also be checked for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired.

c. Container Storage Areas (CSA) – The container storage areas are inspected each operating day, typically Monday through Friday. The condition of the containers are noted. The total volume of the waste held in the CSAs will not exceed the permitted volume for the area. The contents of any leaking or suspect containers must be placed in a container of adequate integrity. The containers will be properly labeled and marked in accordance with U.S. DOT and Oklahoma DEQ hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, repairs will be initiated immediately.

d. Drum washer/dumpster units – The wet dumpster units (in the return and fill station) must be inspected each operating day, typically Monday through Friday, for leaks and sediment buildup. Any leaks must be noted and repair must be initiated immediately. Excess sediment must be removed from the drum washer/dumpsters.

The secondary containment must be checked for cracks and gaps. If cracks are detected, repairs will be initiated immediately.

e. Safety Equipment – The safety equipment is inspected weekly. The fire extinguishers must be checked to ensure that the units are charged and accessible. The operation of the telephone and the eyewash units must be confirmed. The first aid kit and spill clean up equipment must be inspected for adequate content and accessibility. A list of emergency equipment is provided in Appendix F.

f. Security – The operation of each gate and lock must be checked weekly. In addition, the fence must be inspected for deterioration weekly.

g. Air Emission Standards –The facility does not operate process equipment for which the RCRA Subpart AA air emission standards apply. However, the facility utilizes several pumps, valves and other equipment for which Subpart BB standards do apply. This equipment will be subject to the leak detection and record-keeping requirements of Subpart BB. The facility conducts leak inspections, repair and recordkeeping requirements of Subpart BB. Each valve, flange and pump which is associated with the hazardous waste tank and its ancillary equipment must be marked in association with Subpart BB regulations. A piping schematic shows the location and the number assigned to each piece of the equipment. Compliance with the standard will be achieved through facility inspections. If required, leak detection monitoring and repair records are maintained. Records of equipment monitoring and repair are maintained in the operating record. If a potential leak is discovered (by visual inspection, audible indication, or excessive odor) it will be noted on the inspection form. Any leak detected will be repaired as soon as practicable, but at least within 15 days. The leaking piece of equipment must be tagged with the I.D. number, date of potential or actual leak, and the date of leak confirmation. The leak detection and repair record will be kept at the facility. See Appendix F for an example form.

Wastes managed at the Service Center have been determined to contain volatile organic compounds (VOCs) at concentrations greater than 500ppm by weight. Therefore, the storage tanks and containers used for the management of hazardous wastes at the service center are subject to Level 1 control requirements under Subpart CC. Visual inspections of containers and hazardous waste tanks will be completed as required by 40 CFR 264.1084. The initial inspection of the tanks was conducted when the tanks first became subject to the Subpart CC rule. No defects were found during

the visual inspection. The facility complies with Level 1 controls for containers by meeting DOT regulations for packaging hazardous materials and equipping containers with covers in accordance with the requirements of 40 CFR 264.1084.

3.3 FACILITY DESIGN [40 CFR 270.14(b)(8)]

The Tulsa Service Center was designed to minimize the possibility of spills or fires, and to minimize the effects of any accident that may occur. Specifications for the storage facilities, secondary containment, and other equipment are in Appendix C and E and descriptions follow.

3.3.1 Tank Storage

All tanks are constructed in accordance with Underwriters Laboratories Standard 142. The tanks are constructed of carbon steel and painted a light color to reflect sunlight. The tank interiors are not coated. The tanks are located more than 20 feet from the property line, in accordance with National Fire Protection buffer zone requirements. All tanks are equipped with an aural (audible) and visual (strobe light) high level alarm system.

The secondary containment (tank farm) consists of a monolithically poured slab and dike wall. The slab is 6” and the wall is 8” thick steel reinforced concrete. The concrete has been sealed with a protective coating to render it impermeable. The tanks’ secondary containment calculations are shown in Appendix E.

The containment area is designed and operated to remove accumulated liquids through the use of a manually operated pumping system. Accumulated precipitation in the secondary containment system will be removed in a timely basis after detection. A visual inspection of the storm water for a sheen and discoloration will be conducted. If no sheen or discoloration is noted, the accumulated precipitation will be discharged from the tank farm to the surface of the facility. If a sheen is noted, the precipitation will be pumped into an onsite storage tank or vacuum truck for offsite management. If a solvent spill occurs within the containment dike, the spilled material will be completely removed. If water is present should a spill occur, all of the liquid will be managed as hazardous waste.

The return and fill adjacent to the tank farm is located to the west of the tank farm. The drum washer/dumpsters are hard-piped to the tank and all piping is aboveground. Secondary containment is provided by reinforced concrete slab and curbs.

3.3.2 Container Storage [40 CFR 264.173]

The slab, curbing, and collection trenches for the CSAs in the warehouses are made of steel-reinforced concrete. The concrete floors are sealed with a coating that is compatible with the waste being stored, to render it impervious so as to contain leaks and spills until the collected material is detected and removed. In the west warehouse, the container storage area floor is covered by sheets of ¼" steel due to a moisture problem. Steel grates cover the trenches to facilitate the movement of containers across them.

Adequate aisle space will be maintained between rows of waste. This will allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of the facility during an emergency. The containers will be kept closed during storage except when wastes are being added to or removed from them. The containers must be handled and stored such that ruptures and leaks do not occur.

The metal shelter and its secondary containment are constructed of sheet steel and it is painted a light color to reflect sunlight. Overhead doors secure the shelter. Secondary containment in the form of a metal pan at the base of the building is used to contain potential leaks or spills. This container storage area is enclosed, thus preventing run-on from occurring. Spilled or leaked wastes will be removed by using absorbents. The resulting cleanup materials will be drummed and properly disposed of along with other containerized wastes.

3.4 PLANT OPERATIONS - POTENTIAL SPILL AND FIRE SOURCES, AND CONTROL PROCEDURES [40 CFR 264.31]

Employees must perform their duties in the safest, most efficient manner possible. The facility is equipped to facilitate these activities. Whenever possible, containers will be moved using a handcart, and pallets are typically moved using a forklift or pallet jack. Upon arrival at the Service Center, containers of waste are either added to the spent solvent storage tanks or are placed in a container storage area. Open containers of solvent must not be left unattended. Containers holding hazardous waste will always be closed during storage except if necessary to add or remove wastes.

Below are descriptions of situations that can result in accidents and the precautions taken to prevent their occurrence.

3.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

a. Emptying of drummed solvent into the drum washer/dumpster at the return and fill station – As the containers are emptied into the drum washer, solvent can splash out of the drum washer. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by coated concrete and will contain this type of spill. There is a blind sump in this floor for any splashed/spilled solvent to accumulate in. Any accumulated solvent will be pumped from this sump and into the drum washer for transfer to the waste storage tanks.

b. Filling of drums with solvent product – A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill containers with clean solvent. Leaking fittings, a damaged hose, or carelessness could lead to the discharge of solvent outside of the container. Manual emergency shut-off valves are installed on each hose, should the equipment not function properly. Employee training emphasizes the importance of inspection, maintenance, and reporting of conditions with pollution incident potential.

c. Moving of containers – When a container is moved, a potential exists for it to tip over. To minimize the potential for spillage of waste, all containers must be maintained in an upright position and remain tightly closed while in storage or in transit.

d. Delivery truck transfers – The cargo should be secured in the route vehicle with straps or load locks before transport. Individual containers of waste can tip over or be dropped when being moved on or off a delivery truck. Appropriate material handling equipment will be used as necessary. If a spill does occur, the amount of material in the containers is a quantity that can be collected with absorbents. Any contaminated soil that results will be removed and transported to an approved facility for proper disposal.

3.4.2 Potential Major Spill Sources

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

a. Overfilling of storage tanks – Storage tanks can be overfilled with a resulting discharge of materials. The high-level alarm is tested weekly for proper functioning of electrical and mechanical components. Further, the tank volume is checked daily before pumping materials into the tank. This will prevent overfilling of the storage tanks.

b. Leaking pipelines – The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

3.4.3 Potential Fire Sources [40 CFR 264.176]

The following is a list of fire prevention and minimization measures:

a. All waste and products are kept away from ignitable sources – Personnel must confine smoking and open flames to remote areas, separate from any flammable materials. The solvent handling area and the aboveground storage tanks are separated from the warehouse area to minimize the potential for a fire to spread or injury to personnel. All electrical wiring, switches, and fixtures meet applicable fire safety and electrical construction codes.

b. Ignitable wastes are handled so that they do not:

1. Become subject to extreme heat or pressure, fire or explosion, or a violent reaction – The spent parts cleaner solvent is stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources, or sources that are subject to violent reactions. The tanks are vented and the containers are kept at ambient temperature to minimize the potential for pressure buildup.

2. Produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health – The vapor pressure of parts cleaner solvent is low, 0.2 mm Hg at 68°F, and it is reactive with reactive metals and strong oxidizers only. Toxic

mists, fumes, dusts, or gases will not form in quantities to threaten human health since strong oxidizers are rarely handled at this facility and if so, they are only stored for 10 days or less. Solvent vaporization will be minimal under normal working conditions.

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion – See “a” above and “c” below.

4. Damage the structural integrity of the Safety-Kleen facility – The parts cleaner solvent will not cause deterioration of the tank, drums or other structural components of the facility.

c. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.
d. “No Smoking” signs are posted in areas where ignitable materials are handled or stored.
e. Fire extinguishers must be checked once per month by facility personnel to ensure proper charges, and once per year by a fire extinguisher company.

3.4.4 Tank Evaluation and Repair Plan

The waste material stored in the tank at this facility is parts cleaner solvent, which is compatible with the carbon steel structure. In fact, the parts cleaner solvent is often used as a light hydrocarbon coating to prevent rusting of metal parts. The tanks will be checked for corrosion, leaks, or any damage that might affect the integrity of the storage tanks. If significant corrosion is noted, the tank will be removed or repaired. If the corrosion is significant and localized, the tank will be taken out of service immediately and repaired (e.g., a patch welded over the corroded area).

3.4.5 External Factors [40 CFR 270.14(b)(8)]

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside the west warehouse of the Service Center. The container storage areas are in the warehouses and the metal shelter area which are inaccessible to unauthorized personnel.

Vandalism – Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the Contingency Plan.

Strikes – An employee strike would not result in a solvent spill or fire. Operations will cease if a strike occurs.

Power failure – A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.

Flooding – The site elevation is above the projected 100-year floor plain, therefore a 100-year flood will not affect the facility.

Storms or Cold Weather – Storms and cold weather will have no foreseen effect on the facility.

3.5 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS [40 CFR 264.34]

Internal communication within the facility is accomplished by voice. Telephones will be used to report a spill or fire, and to summon assistance from local and state emergency response agencies. Emergency response telephone numbers are posted by each facility telephone. Included in these phone numbers is the 24-Hour Safety-Kleen emergency response coordinator.

CONTINGENCY PLAN

ABSTRACT

PURPOSE: This plan describes the proper action to be taken by employees during an emergency.

RESPONSIBILITIES: The emergency coordinator or alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR: The emergency coordinator and alternate emergency coordinator are designated Safety-Kleen employees who have been trained for these positions.

EMERGENCY NOTIFICATIONS:

Catoosa Police Department	911 or non-emergency 918-266-2424
Catoosa Fire Department	911 or non-emergency 918-266-4611
Saint Francis Hospital	918-494-2200
Safety-Kleen 24-Hr Emergency Response	800-468-1760
Oklahoma Department of Environmental Quality	800-522-0206
National Response Center	800-424-8802

4.0 CONTINGENCY PLAN [40 CFR 264 SUBPART D]
Safety-Kleen Systems
16319 East Marshall Street
Tulsa, OK 74116

4.1 PURPOSE [40 CFR 264.51]

The Contingency Plan describes the actions to be taken by employees in the event of a spill, fire, or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous waste to the air, soil, surface water, or ground water.

The Contingency Plan is to be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment.

4.2 EMERGENCY COORDINATOR RESPONSIBILITIES [40 CFR 264.55]

The emergency coordinator, or alternate emergency coordinator, is responsible for implementing the Contingency Plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or the alternate emergency coordinator be unavailable.

The emergency coordinator and the alternate emergency coordinator must be familiar with all aspects of this Contingency Plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the Contingency Plan. The emergency coordinator and alternate emergency coordinator's home addresses and telephone numbers, as well as the office telephone number are listed in Appendix F. At least one employee will be at the facility, or on call, to respond to an emergency situation at all times. Employee functions during an emergency and the Contingency Plan Quick Reference Guide are also located in Appendix F. .

4.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency, the emergency coordinator (or the alternate when the emergency coordinator is not available) will:

a. Activate the internal facility communication system to notify all facility personnel;
b. Immediately notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number (currently 800-468-1760), which is the Safety-Kleen Incident Notification System;
c. Notify appropriate state or local agencies with designated response roles if necessary; and,

Whenever there is a release, fire, or explosion, the emergency coordinator or alternate must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or, by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator or alternate must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion, (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run off).

During an emergency, the emergency coordinator or alternate must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous material at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

4.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator or alternate emergency coordinator must contact the state agency and Safety-Kleen Emergency Response Coordinators to report the incident. The treatment, storage, and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator or alternate emergency coordinator must ensure that, in the affected area(s) of the facility:

a. No substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and

b. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed.

4.2.3 Reporting Responsibilities [40 CFR 264.56]

If the emergency coordinator or alternate determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

a, If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate local authorities (i.e., fire and police).

b. The coordinator must immediately notify the Safety-Kleen Emergency Response Coordinators, Oklahoma Department of Environmental Quality and the National Response Center if necessary. This notification shall include the following:
   (1) Name and telephone number of notifier;
   (2) Name and address of facility;
   (3) Time and type of incident (e.g., release, fire);
   (4) Name and quantity of material(s) involved, if known
   (5) Extent of injuries, if any; and,
   (6) Possible hazards to human health, or the environment outside the facility

Safety-Kleen will notify the appropriate state and local authorities that the facility is back in compliance with Section 4.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date and details of an incident that requires the implementation of the contingency plan. Within 15 days of the incident, Safety-Kleen will submit a written report to Oklahoma DEQ. The report must include:

a. Name, address and telephone number of the owner or operator;
b. Name, address and telephone number of the facility;
c. Date, time and type of incident (e.g. fire, explosion, spill)
d. Name and quantity of material(s) involved;
e. The extent of injuries, if any;
f. An assessment of actual or potential hazards to human health or the environment;
g. Estimated quantity and disposition of recovered material that results from the incident

4.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

a. The person who discovers/causes the spill reports to the emergency coordinator or alternate emergency coordinator;
b. The emergency coordinator or alternate emergency coordinator contacts the Safety-Kleen Emergency Response Coordinators and .
c. Safety-Kleen's Emergency Response Coordinators, will contact an emergency response contractor, if required.

4.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health or need for evacuation
Fire Department	Notify if there is a fire, uncontrolled spill or other imminent danger
Hospital	Notify if there are any injuries
Oklahoma DEQ	Report releases and fires
National Response Center	Report releases
SK-Emergency Response Contractor	Call to assist with remedial action after a release

Arrangements have been made to familiarize the police department, fire department, and local emergency response teams with the layout of the facility, properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have been made to familiarize the local hospital with the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. Example letters that are sent to the local emergency responders are found in Appendix F.

4.3 EMERGENCY RESPONSE PROCEDURES [40 CFR 264.56]

Response actions to be taken in specific emergency situations are described in the sections which follow.

4.3.1 Minor Spills

If a spill should occur while pouring spent solvent into a drum washer/dumpster or filling containers with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station. Remedial action will not be necessary. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on a paved area, it must be collected with absorbent material. The sorbents will be collected, drummed, and transported to a licensed hazardous waste management facility for proper processing. Should water be present when a spill occurs, all of the liquid will be treated as hazardous waste, unless otherwise determined, and pumped into the spent solvent storage tank. The secondary containment of the container storage area is emptied using a wet/dry vacuum, pump, or absorbent materials. Detergent can be used as needed. All material collected from spill cleanups will be treated as hazardous waste.

b. If the solvent spills on an unpaved area, the free solvent must be collected with absorbent material. The absorbent material and any contaminated soil will be collected, containerized and transported to a licensed hazardous management facility for proper processing.

If a spill occurs while moving or delivering containers outside of the warehouse, the response actions described above must be followed. Spills inside the warehouse or metal shelter will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors should be opened to improve the ventilation in the confined area (if safe to do so). If ignitable materials are spilled in a non-explosion proof rated area or is flowing into such, ensure that sources of ignition (e.g., thermostats or light switches) are left in the same position as at the time of the spill to prevent accidental sparking. Following instructions of the appropriate Safety Data Sheet, the worker will enter the area wearing the required personal protective equipment (e.g., gloves, aprons, safety glasses, and respirator), collect the liquid, containerize it and move it to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water.

4.3.2. Major Spills

Any spill that can not be completely remediated using the methods described in Section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material that escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems, and storm sewer systems. Emergency response to this type of spill should be as follows:

a. Assist any injured people;
b. Stop the flow of materials, if possible;
c. Retain, contain, or slow the flow of the material if it cannot be stopped;
d. If material escapes containment efforts, immediately call the local fire department, and report to the emergency coordinator or alternate emergency coordinator and Safety-Kleen's Emergency Response Coordinators.
e. Immediately recover, to the extent possible, the spilled materials to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator or alternate emergency coordinator shall report any Incident, as soon as possible, to Safety-Kleen's Emergency Response Coordinators using the 24-hour telephone number. As determined by Safety-Kleen's Emergency Response Coordinators an emergency cleanup response contractor will be called. If it is deemed necessary, calls will be made to the National Response Center and Oklahoma DEQ.

The person reporting a spill should be prepared to give his/her name, position, company name, address, and telephone number. The person reporting should also describe the material spilled and if possible, some estimate of the amount, and the contaminant status, and specify any equipment needed.

Spills must be controlled and remediated to the fullest extent possible by Safety-Kleen personnel, even when assistance is required to totally remediate the situation. Safety-Kleen personnel must not take health or safety risks; if there is doubt as to whether a particular action is unsafe, it must be avoided. The source of a release must be stopped by turning off the pumps, closing valves, righting tipped containers or taking other appropriate actions. If the flow cannot be

stopped, a berm should be formed by shoveling dirt or absorbent material around the free liquid to hold it in one place or at least direct it to an area where it will do the least amount of damage (e.g., secondary containment areas).

The free liquid can be collected from the ground or affected surface water using absorbents or UL listed pumps. The liquids must be containerized or added to the waste storage tanks – if solvent waste.

4.3.3. Fire Control Procedures

If a small fire occurs, Safety-Kleen personnel must act quickly to put out the fire before it spreads to other parts of the facility, if possible to do so without undue threat to personal safety. If it cannot be extinguished with one fire extinguisher immediately, evacuate the facility and call the fire department.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those that can immediately be extinguished using one fire extinguisher. Any fire that cannot be brought under control immediately, or which has the potential to become uncontrollable warrants implementation of the evacuation plan.

Vapors of parts cleaner solvent exposed to a spark or open flame may flash at temperatures over 105°F. A parts washer solvent fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Attention should then be directed immediately to extinguishing the flame.

Dry cleaning wastes are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (approximately 1200°F). The potential for the materials reaching a decomposition state is minimal, however, Safety-Kleen personnel and local authorities must be aware of the proper response should a fire affect the container storage area. Emergency response should be as follows:

a. Isolate the hazard area and deny entry to unauthorized personnel;
b. Stay upwind, keep out of low areas;
c. Ventilate closed spaces before entering them;
d. Wear positive pressure breathing apparatus and protective clothing;
e. Evacuate a 600-foot radius endangered by the gas.

A fire in the container storage areas can best be extinguished by foam, water fog, or water spray. Parts cleaner solvent and immersion cleaner can generate carbon monoxide and other poisonous gases when exposed to heat. Therefore, it is important to wear positive pressure breathing apparatus and full protective clothing in the affected area. If a fire in or near the areas where these wastes are stored occurs:

a. Isolate the area and deny entry to unauthorized personnel;
b. Stay upwind, keep out of low areas;
c. Wear protective clothing and self-contained breathing apparatus.

A dry chemical, carbon dioxide or foam will best extinguish the fire. Cool the containers with water until well after the fire has been extinguished.

Explosions, structural damage or other hazardous conditions may result from the spread of the fire, therefore, the site must not be re-entered until the fire department has determined that it is safe to do so.

4.4 EVACUATION PLAN

Clearly marked exits are in the warehouses and office areas. Employees are trained to recognize all potential exit routes. The site evacuation plan is shown in Appendix F. When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assembled across Marshall Street to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation, either from a safe building or from a neighboring facility

4.5 ARRANGEMENTS WITH EMERGENCY RESPONSE CONTRACTORS [40 CFR 264.37]

A list of current, potential emergency response contractors is maintained by Safety-Kleen's Emergency Response Coordinators. These contractors will be contacted to provide emergency assistance during a release and/or cleanup.

Copies of the current Contingency Plan are made available to the applicable emergency response agencies. Safety-Kleen requests that each organization keep the Contingency Plan on file and notify Safety-Kleen if they refuse to enter in an agreement or cannot comply with the procedures

outlined within the plan. The agencies are invited to visit the facility to become more familiar with the site and the general location of hazardous material storage.

4.6 IMPLEMENTATION SCHEDULE [40 CFR 264.51]

Any discrepancies or deficiencies found during a routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The Branch General Manager has the overall responsibility for correcting any discrepancies found during the routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

4.7 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN [40 CFR 264.53,54]

This plan, and all revisions to the plan, are kept at the facility and are regularly updated throughout the operating life of the facility. This plan and all revisions to the plan are made readily available to employees working at the facility. The plan will be reviewed and updated, if necessary, whenever:

a. The facility operations are revised to allow new wastes to be stored or treated, or applicable regulations are revised;
b. The list or location of emergency equipment changes;
c. The facility changes in its design, construction, operation and maintenance, or other circumstances in a way that:
    (1) Increases the potential for fires, explosions, or releases of hazardous constituents, or
    (2) Change the response necessary in an emergency;
d. The names, addresses, or phone numbers of emergency coordinators change;
e. The employee assigned to each emergency task changes; or
f. The plan fails when implemented in an emergency.

5.0 PERSONNEL TRAINING

5.1 OUTLINE OF TRAINING PROGRAM [40 CFR 264.16(d)]

Each employee has received adequate training to operate and maintain the facility safely, and to understand hazards unique to his or her job assignments. Appendix G contains information on Service Center training outlines, and an example of the training record form.

5.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

Environmental compliance and training of branch employees is the responsibility of the Branch General Manager. The corporate regulatory compliance and training departments, in turn, provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for facility personnel. Appendix G contains example job descriptions, example training matrices, and an example training record form. These forms are subject to change and are included as examples only. Many training courses are completed electronically and records will also be maintained electronically.

5.2.1 Branch General Manager

The Branch General Manager is responsible for the business and environmental operations at the Service Center. The branch sales and service representatives, administrators, and warehouse employees report to the Branch General Manager. The Branch General Manager or his/her designee provides the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the Branch General Manager must:

a. Keep the facility clean and orderly;
b. Execute, or designate an employee to execute, the daily inspection, keep a written log, and remediate any problems;
c. Know the potential hazards of the material and wastes handled at the site;
d. Identify potential spill and fire sources and be able to execute the Contingency Plan;
e. Inform all employees of their environmental responsibilities;
f. Notify the proper authorities during an emergency, remediate the situation to the best of their abilities, and submit necessary reports with the company;

PERSONNEL TRAINING

ABSTRACT

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records, and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

TIME OF TRAINING

Job Title	Prior to Starting Work	On The Job	Annually	When Regulations or Procedures Change
Branch General Manager	X	X	X	X
Branch Administrator		X	X	X
Sales/Service Representatives	X	X	X	X
Warehouse Employees	X	X	X	X

5.0 PERSONNEL TRAINING

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a. Keep the facility clean and orderly;
b. Execute, or designate an employee to execute, the daily inspection, keep a written log, and remediate any problems;
c. Know the potential hazards of the material and wastes handled at the site;
d. Identify potential spill and fire sources and be able to execute the Contingency Plan;
e. Inform all employees of their environmental responsibilities;
f. Notify the proper authorities during an emergency, remediate the situation to the best of their abilities, and submit necessary reports with the company;

g. Maintain all environmental records (such as manifests, training records, and spill reports) on file at the facility.

5.3 DESCRIPTION OF THE TRAINING PROGRAM [40 CFR 264.16(a)(1)]

Employee training is accomplished using classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The Environmental Compliance and Corporate Training Departments prepare a training program for employees and the Service Center personnel provide documentation that the program has been executed.

An employee is trained prior to starting, or as soon as he or she begins working within 6 months of starting (depending on his or her position) and annually thereafter. The Environmental Compliance and Corporate Training Department ensures that the Branch General Manager or his/her designate has received adequate training to train all branch personnel. Appendix G contains an example outline of the training program, which demonstrates that facility personnel are trained in hazardous waste management procedures.

5.3.1 Training of New Branch General Managers

New Branch General Managers are trained before they begin their new positions. This training occurs on site, on-the-job, in off-site classroom training, electronic (i.e. video, e-Learning), written, and on-the-job methods. While being trained, a new Branch General Manager reviews all environmental records and learns the recordkeeping requirements. These records include manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates in additional training at the direction of an environmental professional. The training consists of an introduction to environmental law and a review of the Part B permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan. Additional time is spent reviewing past environmental compliance at the Branch General Manager's facility. Regulations unique to the state are discussed as well.

5.3.2 Training of New Branch Administrators

Branch administrators are trained in the proper recordkeeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the Branch General Manager or his/her designee and is

completed within six months of starting. The training includes some of the items listed in the Example Training Plan that may be applicable to the branch administrator's job. In addition, the Contingency Plan must be reviewed with the Branch General Manager.

5.3.4 Training of New Sales and Service Representatives

New representatives are introduced to the Part B Permit which includes: Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, etc. A representative may also be trained as a designate for performing the facility inspection. Additional training is in the form of classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The Contingency Plan must be reviewed before the representative formally begins the new position. Items such as those applicable in the Regulatory Training Matrix must be covered within six months of hire.

5.3.5 Training of New Material Handlers

A material handler is trained to maintain the Service Center and assist the other branch employees in their tasks. A material handler may also be trained as the designate for performing the daily inspection. Additional training may be in the form of videotape presentations, classroom, electronic (i.e. video, e-Learning), written, and on-the-job methods. The Contingency Plan must be reviewed with the Branch General Manager before the material handler formally begins his/her new position, and annually thereafter. Items such as those listed in the Example Training Plan must be explained within six months of starting.

5.3.6 Annual Training [40 CFR 264.16(c)]

On an annual basis, employees are trained using a program prepared and updated by the Environmental Compliance and Corporate Training Department. It includes updates on environmental regulations, an in-depth review of the Contingency Plan, and a review of RCRA inspection criteria.

All Service Center employees will review annually, training items such as those listed in the Example Training Plan outline for branch employees. The annual training may vary from the topics listed in the Example Training Plan outline. This review may be in the form of videotapes and classroom instruction, electronic (i.e. video, e-Learning), written, and on-the-job methods. It will include discussion of the storage facility permit application. The Environmental Compliance and Corporate Training Department issues periodic memoranda on changes in environmental regulations, which all Service Center personnel must read and discuss.

5.4 TRAINING RECORDS [40 CFR 264.16(d)]

All employee regulatory training must be documented. Records of current employees will be kept at the facility until closure. Training documentation will include, at a minimum, the required information listed on the example record forms listed in Appendix G. Some training documentation will be maintained electronically.

CLOSURE PLAN

ABSTRACT

LOCATION ADDRESS: Safety-Kleen Systems, Inc.
16319 East Marshall Street
Tulsa, OK 74116

U.S. EPA I.D. No: OKD 000 763 821

WASTE UNITS TO UNDERGO CLOSURE:

a. Tank Storage: Two 8,000-gallon aboveground storage tanks for spent parts washer solution and spent aqueous solution.
b. Container Storage: One 1,190 square foot area for container storage in the west warehouse with a storage capacity of 4,464 gallons and one 1,275 square foot area of container storage in the east warehouse with a storage capacity of 6,912 gallons.
c. Return and Fill Station: The location of this unit is shown on the Site Plan and consists of two drum washers with a combined capacity of 324 gallons.
d. Metal Shelter: The location of this structure is shown on the Site Plan. It has a storage capacity of 2,184 gallons.

6.0 CLOSURE PLAN [40 CFR 270.14(b)(13) and 40 CFR 264 SUBPART G]

6.1 PURPOSE

The Tulsa Service Center operates as a storage facility for hazardous wastes and must be closed in accordance with the closure requirements of 40 CFR 264, Subpart G. Closure of the facility will be carried out in accordance with the steps in this plan. Appendix H contains an estimated schedule and cost. The closure cost will be updated at the beginning of each calendar year. Safety-Kleen will remediate all hazardous wastes from the facility to a level that is determined to be protective of human health and the environment. Hazardous wastes will be stored in appropriate containers and not in waste piles or landfills, therefore, no post closure maintenance is planned. Upon completion of closure activities, the need for post-closure maintenance will be minimized or eliminated.

6.2 ABOVEGROUND TANKS AND ASSOCIATED PIPING [40 CFR 264.197(a)]

To safely clean and decommission the aboveground storage tanks:

a. Remove the remaining material from the tank and return the materials to the Recycle Center for reclamation.
b. Provide access to the tank
c. Rinse, scrape and squeegee the tank interior, removing all residual waste material and rinsate
d. Disconnect and decontaminate all appurtenant piping and pumping equipment
e. Remove tank and appurtenant equipment and reuse or sell as scrap
f. Clean the concrete diking and slab. Alternately, Safety-Kleen may want to leave the tanks and concrete diking and slab in place following closure as a RCRA permitted facility
g. If necessary, backfill all excavations with clean fill materials
h. Transport and dispose of all waste material generated during the project

6.2.1 Removal of Waste Material and Opening of the Tank

To safely open the tank and remove the waste material:

a. Pump the waste materials out of the tank using a pump, vacuum truck, or similar equipment and transport to a Safety-Kleen Recycle Center or other properly permitted facility for reclamation.

b. To gain access to aboveground tanks, use the man way at the top of the tank, or on the side of the tank. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the man way. Special care will be exercised to minimize spark generation when working on the tank.

c. Prior to entering the tank, personnel will have appropriate respiratory equipment and protective clothing. Once the tanks have been opened, they must be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

6.2.1 Removal of Residual Waste and Cleaning of Tank

To safely remove the residual waste and clean the tank:

a Before removing any residual waste from the tank, all piping and appurtenant equipment associated with the parts washer solvent tank will be flushed with a detergent solution.

b. The method used to remove residual waste from the tank will depend on the physical properties and quantities of the material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible.

c. Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high-pressure wash system using a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be returned to a Recycle Center for reclamation. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

d. Storage tanks are considered confined spaces per OSHA. Confined space entry requires special procedures. These procedures will be specified in the site health and safety plan prepared by the independent engineer.

6.2.3 Removal of the Tank

To safely remove the tank:

a. Disconnect and decontaminate all appurtenant piping and pumping equipment.

b. The vessel shall be removed and reused or cut up and sold as scrap. The tanks and piping unfit for reuse shall be removed and disposed of at a properly permitted landfill or recycled as scrap. Verification of destruction will be provided. The rinsate will be collected and sent to a Safety-Kleen Recycle Center or properly permitted treatment or disposal facility for treatment.

c. The concrete diking will be cleaned with a high-pressure water detergent solution. A sample of the final rinse water will be collected and analyzed for volatile organic compounds to confirm the cleanliness of the diking. Soil samples beneath the concrete will be collected only if significant, fully-penetrating, unsealed cracks are evident in the concrete slab. All soil samples will be analyzed for mineral spirits, volatile organic compounds, and characteristic for toxicity due to cadmium, chromium, and lead using TCLP protocol. If contamination is indicated, a soil study will be done to determine the extent. Over excavation of the soil or other approved method will be performed to eliminate the contamination. Soil samples will be collected and analyzed after cleanup to ensure decontamination has been achieved.

d. Inspect the excavation and backfill with clean fill materials and grade to ground level.

6.3 CONTAINER STORAGE AREAS IN WAREHOUSES (CSAs) [40 CFR 264.178)]

The CSAs are used for the storage of containers that may contain spent parts washer solvent, aqueous parts cleaner waste, spent immersion cleaner, dry cleaning waste, dumpster sediment, paint waste, used antifreeze, photographic imaging waste, spent industrial fluids, used oil and various transfer wastes. At closure, the containers will be removed and transported to an appropriate licensed hazardous waste management facility after proper packaging, labeling, and manifesting.

The concrete floor and spill containment sump will be cleaned with a detergent solution. The final rinsate will be analyzed for volatile organic compounds. All rinsate wastes generated in the container storage area will be transported to a licensed hazardous waste management facility.

6.4 CONTAINER STORAGE AREA IN METAL SHELTER [40 CFR 264.178]

The metal shelter is used for the storage of containers that may contain spent parts washer solvent, aqueous parts cleaner waste, spent immersion cleaner, dry cleaning waste, dumpster sediment, paint waste, used antifreeze, photographic imaging waste, spent industrial fluids, used oil and various transfer wastes. At closure, the containers will be removed and transported to an appropriate licensed hazardous waste management facility after proper packaging, labeling, and manifesting.

The shelter will be thoroughly cleaned with a detergent solution. The final rinsate will be analyzed for volatile organic compounds. Rinsing and washing will continue until these levels are found to be below detection limits. All rinsate wastes generated in the container storage area will be transported to a licensed hazardous waste management facility.

The shelter will be reused by the Company or recycled as scrap metal.

6.6 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the spent parts cleaner solvent and spent aqueous solutions to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, any sediment in the drum washers will be removed and containerized, labeled, and manifested for proper treatment and/or disposal through a Safety-Kleen recycle center.

The drum washers and the dock area will be thoroughly rinsed with a detergent solution. The rinsate will be discharged through the appurtenant piping system into the storage tanks, will be subjected to a separate closure procedure as described earlier. The final rinsate must be analyzed for volatile organic compounds. The clean drum washers and dock structure may be reused by Safety-Kleen or disposed at a properly permitted landfill or used as scrap metal.

6.7 DECONTAMINATION OF CLEANUP EQUIPMENT [40 CFR 264.116]

All equipment used for the closure of the facility will be properly decontaminated prior to its reuse. Small equipment (such as mops, rags, etc.) and their residue that cannot be reused will be transported to a licensed hazardous waste management facility.

6.8 FACILITY CLOSURE SCHEDULE AND CERTIFICATION [40 CFR 264.113 & 115]

Within 90-days of receiving the final volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The Oklahoma Department of Environmental Quality may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90-days to complete or the following requirements are met:

a. The facility has the capacity to receive additional wastes;
b. There is a likelihood that an entity other than Safety-Kleen will recommence operation of the site; and/or
c. Closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

When closure is completed, Safety-Kleen shall submit to the DEQ, certification, both by the operator and by an independent registered professional engineer that the facility has been closed in accordance with the approved Closure Plan.

7.0 MANAGEMENT OF WASTES IN CONTAINERS

7.1 DESCRIPTION OF WASTES TO BE STORED [40 CFR 264.173]

The container storage areas in the east and west warehouses and the container storage area in the metal shelter are used for the storage of used immersion cleaner, spent aqueous parts cleaning solutions, spent aqueous brake cleaning solution, spent parts washer solution, dry cleaning wastes, paint wastes, drum washer/dumpster sediment, tank bottom sediment, contaminated debris, and transfer wastes. These may carry one or more of the waste codes listed in the Facility Description – Abstract at the beginning of this application. incompatible wastes are kept segregated. In addition, proper hazardous waste labels are affixed to the containers. Hazardous waste labels must include the following wording: "*Hazardous Waste – Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency."* Labels must also include the generator's name and address and manifest document number.

In addition, the labels must include the EPA waste codes, the accumulation start date and the generator's EPA ID number (if applicable). The container storage areas store DOT-approved containers normally ranging in volume from 5 gallons up to an 85-gallon overpack and occasionally bulk storage containers (totes, cubic yard boxes etc.) up to 350 gallons.

7.2 SECONDARY CONTAINMENT STRUCTURES [40 CFR 264.175]

The container storage area in the east warehouse has secondary containment in the form of a coated concrete floor which slopes to two, coated concrete, grated, blind trenches located along the north and south sides of the storage area. The area is also surrounded by a six-inch wide by four-inch high curb.

The container storage area in the west warehouse has secondary containment in the form of a metal, diamond-plated floor, a six-inch wide by four-inch high steel reinforced concrete curb, and a blind trench located along the north entrance.

The metal shelter has secondary containment in the form of a metal pan at its base.

The total containment volume in each storage area is more than 10% of the total volume of the containers that will be stored in each area at a time.

The slabs and collection trenches for the container storage areas are made of steel reinforced concrete. Joints are sealed with chemical-resistant water stops. Steel grates cover the

trenches to facilitate the movement of drums across them. The entire base is free of cracks and gaps and has been sealed with chemical resistant coating to further decrease permeability. The wastes in storage are only incompatible with strong oxidizers and reactive metals, which are not present in the base or sealants.

The total volume of materials (including products and non-hazardous wastes) stored in the container storage areas will not exceed the volume shown in the Waste Analysis Plan (WAP) Abstract.

7.3 PREVENTION OF RUNON, RUNOFF AND ACCUMULATION OF SPILLS [40 CFR 264.175]

The container storage areas are indoors so accumulation of precipitation, runon and runoff is essentially eliminated. Spilled or leaked waste must be removed from the secondary containment systems with sufficient frequency to prevent overflow. Daily inspections for the trenches will result in the removal of any accumulated liquids. A hand-held pump (e.g., COMS pump or wet/dry vacuum), sorbent material or other appropriate methods will be used to remove liquids. Material will be properly disposed of.

7.4 STORAGE CONFIGURATION

The containers of permitted waste will be stored in rows on pallets. Containers that are 55-gallons or larger will not be stacked more than three high and pallets will be used between layers of stacked containers. Containers in the storage areas are moved with a forklift, pallet jack, drum cart or other safe and effective means. Total volume of material (both product and waste) to be stored in the warehouses or metal shelter, at any given time, will not exceed the volume shown in the Waste Analysis Plan (WAP) Abstract.

Incompatible wastes will be segregated appropriately per DOT segregation requirements.

7.5 COMPATIBILITY OF CONTAINERS WITH THEIR CONTENTS AND EACH OTHER [40 CFR 264.172]

All wastes will be stored in containers that meet DOT specifications for those materials.

7.6 HANDLING AND MANAGEMENT OF CONTAINERS

Containers holding hazardous wastes will be closed during storage except when it is necessary to add or remove waste. In addition, containers holding hazardous waste will not be

opened, handled or stored in a manner which may rupture the container or cause it to leak. Containers will be closed during movement and, if necessary, opened only in contained areas. Any objects or actions that may cause puncture of containers must be avoided.

7.7 INSPECTIONS [40 CFR 264.174]

The container storage areas must be inspected on all operating days, which excludes weekends and holidays. If a container holding hazardous waste is not in good condition, or it begins to leak, its contents are either transferred to a new container, the leaking container is overpacked or it is managed in another way that complies with this section.

The containment structure must be inspected for cracks, corrosion, or any other sign of deterioration. Any sign of deterioration must be noted on the inspection sheet and the deterioration must be remediated.

7.8 BUFFER ZONE REQUIREMENTS [40 CFR 264.176]

In accordance with 40 CFR 264.176, containers holding ignitable wastes must not be stored within 50 feet of the property line. Each container storage area meets the 50-foot buffer zone requirement.

7.9 COMPLIANCE WITH LAND DISPOSAL RESTRICTIONS [40 CFR 264.168]

In accordance with 40 CFR 268.50, each waste container must be clearly marked to identify its contents and the date the period of accumulation began. No container may be stored for longer than one year (unless it is non-hazardous).

7.10 SUBPART CC [40 CFR 264.1086]

Containers managing hazardous wastes at this facility generally fall into the following categories:

a. Those hazardous waste containers that are less than 26 gallons in capacity are exempt from regulation under Subpart CC. In addition, containers which are “transferred” through the facility are considered to be in the course of transportation, as opposed to storage, and therefore, are not subject to Subpart CC standards.

b. Containers with capacities between 26 and 122 gallons are Level 1 containers, and generally meet the Level 1 standards of the container being covered and designed and operated with no gaps, holes, cracks, or other open spaces. In addition, containers used to manage wastes meet applicable U.S. DOT regulations for packaging and transport.
c. Containers greater than 122 gallons that manage hazardous wastes at this facility are not in light liquid service and are therefore considered Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces. In addition, containers used to manage waste meet applicable U.S. DOT regulations for packaging and transport of hazardous materials.

Hazardous wastes accepted from off-site generators are already containerized when the facility accepts the waste. Such containers are visually inspected at time of pickup, at time of offload for storage or transfer at the facility and during the daily inspection.

8.0 MANAGEMENT OF WASTE IN TANKS [40 CFR 264 SUBPART J]

8.1 DESCRIPTION OF TANK SYSTEM

The waste storage tank system is aboveground and piping outside of secondary containment has welded joints.

The two 8,000-gallon aboveground, horizontal hazardous waste (HW) storage tanks are 21' long by 8' high. The tanks are constructed of 3/16" thick (1/4" at the bottom third of the tank) carbon steel painted white to reflect sunlight and minimize corrosion. The tanks have been designed in accordance with Underwriters Laboratories (UL) Standard 142 and they are located more than 20 feet from the property line, in accordance with Table 2-6 of the National Fire Protection buffer zone requirements. Spent parts washer solution is stored in both tanks. The entire facility, including the tank farm, is secured by a 6' high chain link fence topped by three strands of barbed wire.

A manually-controlled waste feed cut-off valve located adjacent to the drum washer/dumpster unit at the return and fill station can prevent the waste tanks from being overfilled. In addition, both of the aboveground tanks are equipped with high level alarms (aural and visual) to indicate when the tanks are approximately 95% full.

Each tank is equipped with a pressure/vacuum vent which operates at two ounces of pressure and one ounce of vacuum. The tanks operate at atmospheric pressure and venting is to the atmosphere. Also, the man way on each tank is allows for emergency venting of the tank in the event of an emergency as prescribed by the National Fire Protection Association. The specific gravity of the spent parts washer solution is approximately 0.8 and the vapor pressure at 68°F is 0.4mm Hg.

The tanks at the facility do not have bypass systems.

8.2 DESCRIPTION OF SECONDARY CONTAINMENT SYSTEM [40 CFR 264.193]

The secondary containment for the tanks consists of a monolithically poured concrete slab and dike wall. Joints are protected with chemical-resistant water stops. The slab is 6" thick and the wall is 6" thick steel-reinforced concrete. The diked area is shown on a drawing in Appendix E and has a containment volume in excess of 8,000 gallons plus the precipitation from a 25-year, 24-hour rain event. Accumulated rainwater will be removed from the secondary containment within 24 hours after the ceasing of a rain event. It will be inspected for any appearance of sheen. If no sheen is present, the precipitation will be pumped to ground. If sheen is present, the precipitation will be pumped into the waste storage tank for proper disposal. Currently there are three tanks holding

8,000 gallons each present in the diked area, with room to add a fourth tank if needed. Two tanks are for spent parts washer solution and spent aqueous solutions and the other one is for clean parts washer solvent. Each tank is equipped with a high-level alarm. Reference is made to the tank farm plan in Appendix E for secondary containment calculations.

8.3 TANK MANAGEMENT PRACTICES [40 CFR 264.195]

The tanks and secondary containment are inspected each operating day excluding holidays and any other occasion when no operations are occurring (e.g. weekends, inclement weather, all-day training, power outage etc.). Specific parameters of the inspection are covered in Section 3.2. Volume gauges must be checked to ensure the tanks are not being overfilled. Leaks or signs of deterioration must be noted and remediated immediately. The procedures to remove spilled or leaked material from the secondary containment are described in 4.3.1 and 4.3.2. Spilled or leaked material will be removed immediately upon detection.

8.4 SUBPART CC [40 CFR 264.1084]

There are two waste storage tanks at the facility. Tank features as they related to Subpart CC are as follows: tanks are non-pressurized, fixed-roof type with a capacity of less than 20,000 gallons. The waste stored in the tanks exhibits a vapor pressure of less than 5.2 kPa (11.1 psi). The actual vapor pressure of the waste managed is approximately 0.008 psi.

The tanks are designed and operated so that cover openings can be closed with no visible gaps, holes, cracks or other open spaces into the interior of the tanks. The cover and cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a closed position except when the waste is being added or removed from the tanks, or when necessary sampling or repair/maintenance is performed. The tanks are vented to the atmosphere through a safety device which has been designed to operate with no detectable emissions when the device is in the closed position.

Visual inspections of the tanks and control devices are conducted on an annual basis.

9.0 SPECIAL CONDITIONS – CUP (CONTINUED USE PROGRAM)

9.1 DESCRIPTION

Under the CUP, spent parts washer solutions (hereinafter CUP solvents) collected from customers are eligible to be used for drum washing activities at the facility and are exempt from the definition of hazardous waste as provided in 40 CFR 261.2(e)(1)(ii), when the CUP solvents are managed according to the following:

1. No generators located outside the state of Oklahoma will be allowed to participate in the CUP program at the Tulsa, OK service center.

2. Safety-Kleen shall maintain the following records at the facility from each generator for a minimum of three years in accordance with the requirements of 40 CFR 261.2(f):
    a. Name, address and EPA ID number (if applicable)
    b. Quantity of CUP solvent picked up
    c. Continued Use Service Checklist

3. CUP solvents that meet any of the following criteria shall be managed as a hazardous waste:
    a. CUP solvent not used to wash drums
    b. CUP solvent that would be ineffective as a drum washing agent
    c. CUP solvent that is cross-contaminated with any foreign materials that would render the CUP solvent ineffective as a drum washing agent

4. Safety-Kleen shall use only the CUP solvent vat located in the Return and Fill shelter area for handling/transference of CUP solvent. Non-CUP solvent will not be placed in the CUP vat.

5. In the event Safety-Kleen discovers that a CUP customer has returned or attempted to return to Safety-Kleen (a) solvents in violation of the criteria set forth in the Solvent Eligibility Form or (b) solvents containing non-solvent, toxic materials of a type or amount not consistent with the customer's normal parts washing activities, Safety-Kleen will warn the customer that they may be removed from the program if the problem persists.

6. Safety-Kleen will not speculatively accumulate CUP solvent. To ensure that speculative accumulation is not occurring, CUP solvent must be used within 96 hours of receipt (excluding weekends).

7. Safety-Kleen shall not use more CUP solvent than necessary for the drum washing operation. No more than 13 gallons of CUP solvent shall be used per drum wash cycle. It should be noted, however, that not every drum can be adequately cleaned with a single drum wash cycle. Therefore, occasionally, more than one wash cycle may be needed to clean a single drum.