



Alabama Department of Environmental Management
adem.alabama.gov

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Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

August 26, 2019

CERTIFIED MAIL # 91 7199 9991 7039 3003 7985

Mr. Bryan Jones
Clean Earth of Alabama
402 Webster Chapel Road
Glencoe, Alabama 35905

Re: Draft AHWMMMA Permit Public Notice
Clean Earth of Alabama (CEA)
402 Webster Chapel Road
Glencoe, Alabama
USEPA I.D. Number ALD 981 020 894

Dear Mr. Jones:

The Department has reviewed CEA's Alabama Hazardous Wastes Management and Minimization Act (AHWMMMA) permit application dated November 11, 2013; as modified by subsequent amendments dated April 2, 2014; May 29, 2014; October 4, 2016; July 5, 2017; August 13, 2017; September 15, 2017; June 22, 2018; May 20, 2019; and June 7, 2019; and has determined it to be complete in accordance with ADEM Admin. Code r. 335-14-8-.08(2)(d). Please find enclosed a copy of the Fact Sheet, Public Notice Announcement and Draft Permit for your reference. These materials, along with the Draft Permit Application will be on display electronically via <http://www.adem.alabama.gov/newsEvents/publicNotices.cnt> and also at the ADEM's main office in Montgomery for the public to view. The public review period will begin on August 30, 2019 and will end at 5:00 p.m. on October 14, 2019. Please note that during the public notice period the facility has the same right and obligation to comment on the draft permit modification as the public. Comments should be submitted to ADEM.

Should questions or comments arise regarding this public notice, please contact Metz Duites of the Engineering Services Section at (334) 270-5679 or at mpd@adem.alabama.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Sonja B. Favors".

Sonja B. Favors, Chief
Industrial Hazardous Waste Branch
Land Division

Enclosures

cc/via email: ADEM: Wade Reeves, Brent Watson, Austin Pierce



**Clean Earth of Alabama
Glencoe, Alabama
EPA I.D. Number ALD 981 020 894**

FACT SHEET

A draft modification to the Alabama Hazardous Waste Management and Minimization Act (AHWMMA) permit has been prepared for the Clean Earth of Alabama (CEA) facility. This hazardous waste facility is located in Glencoe, Alabama. This fact sheet has been prepared to briefly advise the public of the principal permitting, legal and policy issues of the draft permit.

I. PERMIT PROCESS

The purpose of the permitting process is to allow the State and the public to evaluate CEA's ability to comply with the hazardous waste management requirements of the AHWMMA, as amended. CEA must comply with hazardous waste management conditions set forth in the permit during the effective period of the permit, which is ten (10) years from the last permit renewal.

II. PROCEDURES FOR REACHING A FINAL DECISION

The Alabama Department of Environmental Management (ADEM or Department) is proposing to modify CEA's operating permit for Storage in Containers and Storage & Treatment in Tanks.

ADEM Admin. Code r. 335-14-8-.08(6)(b)1. requires that the public be given a 45-day comment period for each draft permit. The comment period will begin on August 30, 2019, which is the date of publication of the public notice in major local newspaper(s) of general circulation and will end on October 14, 2019. The public notice will also be broadcast over local radio station(s).

Any person interested in commenting on the application or draft permit must do so within the 45-day comment period discussed above.

All persons wishing to comment on any of the permit conditions or the permit application should submit their comments in writing to the Alabama Department of Environmental Management, Permits and Services Division, 1400 Coliseum Blvd. (zip 36110-2059), P.O. Box 301463 (zip 36130-1463) Montgomery, Alabama, ATTENTION: Mr. Russell A. Kelly.

ADEM will consider all written comments received during the comment period while making a permit decision for this facility. When the Department makes its final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision.

III. FACILITY DESCRIPTION

Clean Earth of Alabama (CEA) has applied for a permit under the requirements of AHWMMMA for treatment, storage, and off-site disposal of hazardous waste. CEA processes industrial wastes including, but not limited to, paints, lacquers, thinners, waste petroleum products, petroleum by-products, aerosols, inks, resins, adhesives, petroleum distillates, solvents (halogenated and non-halogenated), organic chemicals and by-products, various alcohols, waste contaminated material and residues in its waste storage, blending and processing facility. Waste materials are delivered to CEA in bulk and/or various container sizes and either processed, blended and consolidated and/or stored in various container sizes or tanks on-site or processed and shipped off-site to an approved, permitted disposal facility.

Additional provisions have been included in the permit as a result of the changes made to AHWMMMA to incorporate the requirements of the 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA. These requirements are included in accordance with ADEM Admin. Code r. 335-14-5-.06(12), which addresses corrective action for Solid Waste Management Units (SWMUs). This rule requires a RCRA Facility Assessment (RFA) of all SWMUs to be conducted at the facility. The RFA for CEA was completed in September 2015 and SWMUs have been identified. All SWMUs are recommended for further sampling and corrective action if necessary.

IV. SUMMARY OF PROPOSED MODIFICATIONS

A second identical shredding unit will be added and located next to the first shredder – which has been in service since March 2017 – inside Building #2.

V. CHANGES TO THE EXISTING PERMIT

The specific changes to the permit are explained below.

<u>Section/Appendix</u>	<u>Reason</u>
Permit Cover Page	Inclusion of fifth modification date.
Permit Signature Page	Inclusion of fifth modification date.
Application Part-A, page 8	Added one more unit of shredder.
Application Section 5.4, page 27	Updated to indicate an additional second identical shredding unit.
Application Section 11, page 70	<ul style="list-style-type: none">- Updated to indicate an additional second identical shredding unit.- Removed verbiage regarding the previous proposed changes (building name change) that has already been approved and implemented.

VI. TECHNICAL CONTACT

Metz Duites
Engineering Services Section
Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Blvd. (zip 36110-2059)
P.O. Box 301463 (zip 36130-1463)
Montgomery, Alabama
(334) 270-5679
MPD@adem.state.al.us

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
HAZARDOUS WASTE PERMIT

Permittee:

OWNER:
Clean Earth of Alabama
334 South Warminster Road
Hatboro, PA 19040

PERMIT NUMBER: ALD 981 020 894
ID NUMBER: ALD 981 020 894

OPERATOR:
Clean Earth of Alabama
402 Webster Chapel
Glencoe, Alabama 35905
Etowah

Pursuant to the Alabama Hazardous Wastes Management and Minimization Act (AHWMMA), Code of Ala. 1975, Section 22-30-1, et. seq., as amended, and attendant regulations promulgated thereunder by the Alabama Department of Environmental Management (ADEM or the Department), a permit is issued to Clean Earth of Alabama (hereinafter called the Permittee) for the facility located in Glencoe, Alabama, at latitude N33° 55' 20" and longitude W85° 54' 20".

The Permittee must comply with all terms and conditions of this permit, which consists of the conditions set forth herein (including those in any attachments), and the regulations applicable to the Permittee's facility contained in Chapters 335-14-1, 335-14-2, 335-14-5, 335-14-8, and 335-14-9 of the ADEM Administrative Code of Regulations (hereinafter referred to as the "ADEM Admin. Code Rule"). Applicable regulations are those which are in effect on the date of issuance of this permit.

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated November 11, 2013, as modified by subsequent amendments dated April 2, 2014; May 29, 2014; October 4, 2016; July 5, 2016; August 13, 2017; September 15, 2017; June 22, 2018; May 20, 2019, and June 7, 2019 (hereby incorporated by reference and hereafter referred to as the Application) is accurate and that the facility will be constructed and operated as specified in the Application. Any inaccuracies found in this information could lead to the termination or modification of this permit in accordance with ADEM Admin. Code Rules 335-14-8-.04(2), 335-14-8-.04(3), and 335-14-8-.04(4) and could lead to potential enforcement action. The Permittee must inform ADEM of any deviation from or changes in the information provided in the Application that would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of September 26, 2014; as revised October 14, 2016; April 5, 2018; August 1, 2018; May 31, 2019, and **XXXXXX, 2019** and shall remain in effect until September 25, 2024 unless revoked and reissued, or terminated under ADEM Admin. Code Rules 335-14-8-.04(2) and 335-14-8-.04(4) or continued in accordance with ADEM Admin. Code Rule 335-14-8-.05(2).

Alabama Department of Environmental Management

Date Signed

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Documents Incorporated By Reference:

Part A and Part B Permit Application submitted on 11/11/2013, as modified by subsequent amendments dated 4/2/2014, 5/29/2014, 10/4/2016, 7/5/2017, 8/13/2017, 9/15/2017, 6/22/2018, 5/20/2019, and June 7, 2019.

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PART I
STANDARD FACILITY CONDITIONS

I.A. EFFECT OF PERMIT

Issuance of this permit does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under the AHWMMMA, or any other law governing protection of public health or the environment, for any imminent and substantial endangerment to human health, welfare, or the environment.

I.B. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

I.C. DUTIES AND REQUIREMENTS

1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of the AHWMMMA, and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply

- a. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must apply for and obtain a new permit.
- b. The Permittee must submit an application for a new permit for both post-closure and Solid Waste Management Unit (SWMU) corrective measures at least 180 calendar days before the expiration of this permit. The Permittee must reapply in order to fulfill the 30-year post-closure care period required by ADEM Admin. Code Rule 335-14-5-.07(8)(a)1. The Department may shorten or extend the post-closure care period applicable to the hazardous waste facility in accordance with ADEM Admin. Code Rules 335-14-5-.07(8)(a)2. and 335-14-8-.03(1)(b).

3. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

4. Duty to Mitigate

In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

5. Proper Operation and Maintenance

The Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment, monitoring, and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance (O&M) includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

6. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause as specified in ADEM Admin. Code Rules 335-14-8-.04(2), 335-14-8-.04(3) and 335-14-8-.04(4). The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay any permit condition.

7. Property Rights

Issuance of this permit does not convey any property rights of any sort, nor any exclusive privilege.

8. Duty to Provide Information

The Permittee shall furnish to the Department, within a reasonable time as determined by the Department, any relevant information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

9. Inspection and Entry

The Permittee shall allow duly designated officers and employees of the Department or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and,
 - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the AHW MMA, any substances or parameters at any location. The Permittee shall have the opportunity to split samples during sampling.
10. Monitoring and Records
- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from ADEM Admin. Code Rule 335-14-2-Appendix I or the methods specified in Section 2 of the permit application. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 (latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Standard Methods for the Examination of Water and Wastewater (latest edition), the methods specified in Section 2 of the permit application, or an alternative method approved by ADEM. [ADEM Admin. Code Rules 335-14-8-.03(1)(j)1.]
 - b. The Permittee shall maintain at the facility records of all monitoring information, including all calibration and maintenance records, all original strip chart recordings for continuous instrumentation, the certification required by ADEM Admin. Code Rule 335-14-5-.05(4)(b)9, records of all data used to prepare documents required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit for a period of at least three (3) years from the date of the certification, application, sample, measurement, report or record, or until corrective action is completed, whichever date is later. This period may be extended by the Department at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility. [ADEM Admin. Code Rules 335-14-5-.05(5)(b) and 335-14-8-.03(1)(j)2.]
 - c. The Permittee shall maintain, at the facility, records of all groundwater monitoring wells, piezometers, and associated groundwater surface elevations throughout the post-closure care period. These records shall include the surveyed location, surveyed elevation, surveyed elevation reference point, total depth, screened interval, construction details, well log, and all other pertinent information for each well and piezometer.
 - d. Records of monitoring information shall include:

- i. The date(s), exact place, and times of sampling or measurements;
 - ii. The names of individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The names of individual(s) who performed the analyses;
 - v. The analytical techniques or methods used; and,
 - vi. The results of such analyses.
- e. The following documents and information shall be maintained throughout the post-closure care period at the Facility.
- i. Complete copy of this permit and the permit application.
 - ii. Operating record as required by ADEM Admin. Code Rule 335-14-5-.05(4) and this permit.
 - iii. Copies of all plans, reports, inspection schedules, inspection logs as required by ADEM Admin. Code Rule 335-14-5 and this permit.

11. Signatory Requirements

All applications, reports or information required by this permit and submitted to the Department shall be signed and certified in accordance with ADEM Admin. Code Rules 335-14-8-.02(2) and 335-14-8-.03(1)(k).

12. Reporting Requirements

a. Planned Changes

The Permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility and any solid waste management units identified under Part V of this permit.

b. Anticipated Noncompliance

The Permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

c. Transfer of Permit

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to ADEM Admin. Code Rule 335-14-8-.04

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or 335-14-8-.04(3)(a)1.(vii). Before transferring ownership or operation of the facility during its post-closure period, the Permittee shall notify the new owner or operator, in writing, of the requirements of ADEM Admin. Code Rules 335-14-5 and 335-14-8 and this permit.

d. Monitoring Reports

Monitoring results shall be reported at the intervals specified elsewhere in this permit.

e. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Department no later than 14 calendar days following each schedule date.

f. Twenty-Four Hour Reporting

i. The Permittee shall report to the Department any noncompliance with this permit that may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include, but is not limited to, the following:

- (I) Information concerning the release of any hazardous waste which may endanger public drinking water supplies; and,
- (II) Information concerning the release or discharge of any hazardous waste, or hazardous waste constituents, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility.

ii. The description of the occurrence and its cause shall include:

- (I) Name, address, and telephone number of the owner or operator;
- (II) Name, address, telephone number, and EPA Identification Number of the facility;
- (III) Date, time, and type of incident;
- (IV) Name and quantity of material(s) involved;
- (V) The extent of injuries, if any;
- (VI) An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and,

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(VII) Estimated quantity and disposition of recovered material that resulted from the accident.

iii. A written submission shall also be provided within 5 calendar days of the time that the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

g. Other Noncompliance

The Permittee shall report to the Department all instances of noncompliance not otherwise required by Permit Conditions I.C.12.d., I.C.12.e., or I.C.12.f. at the time any other reports required by this permit are submitted. The reports shall contain the information required by Permit Condition I.C.12.f.

h. Other Information

Where the Permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information. In addition, upon request, the Permittee shall furnish to the Department any information related to compliance with this permit.

13. Certification of Construction

The Permittee may not commence treatment, storage or disposal of hazardous waste or contaminated media at any new or modified portion of the facility until the Permittee has submitted to the Department, by certified mail or hand-delivery, a letter (together with the certification by the construction quality assurance officer required by ADEM Admin. Code Rule 335-14-5-.02(10)(d) and any other certifications required by this permit or ADEM Admin. Code Rule 335-14) signed by the Permittee and an Alabama-registered professional engineer, stating that the facility has been constructed or modified in compliance with this permit where appropriate; and,

a. The Department has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of this permit; or

b. The Department has either waived the inspection or has not notified the Permittee, within 15 calendar days of the notification from the Permittee, of its intent to inspect.

14. The Permittee shall assure that all measures necessary to maintain and/or achieve compliance with all applicable requirements of ADEM Admin. Code Rules 335-14 are taken during the active life of the facility, and throughout the post-closure care period, corrective action period, and the term of this permit.

15. In the event that circumstances beyond the Permittee's control arise to prevent achievement of any deadline set forth by this permit, the Permittee may immediately

upon the occurrence thereof, request an extension by sending a written request to the Department explaining the need for the extension. The Department may, after consideration of the circumstances, grant the extension. Requests for extensions may require a permit modification pursuant to ADEM Admin. Code Rule 335-14-8-.04(2).

I.D. DEFINITIONS

For the purposes of this permit, terms used herein shall have the same meaning as those in ADEM Admin. Code Rules 335-14-1, 335-14-2, 335-14-5, and 335-14-8, unless this permit specifically provides otherwise. Where terms are not defined in the regulations or this permit, a standard dictionary reference or the generally accepted scientific or industrial meaning of the term shall define the meaning associated with such terms.

"Area of concern" (AOC), for the purposes of this permit, includes any area having a probable release of a hazardous waste or hazardous constituent which is not from a solid waste management unit and is determined by the Department to pose a current or potential threat to human health or the environment. Such areas of concern may require investigations and remedial action as required under Section 3005(c)(3) of the Resource Conservation and Recovery Act and ADEM Admin. Code Rule 335-14-8-.03(3)(b)2. in order to ensure adequate protection of human health and the environment.

"Contamination," for the purposes of this permit, refers to the presence of any hazardous constituent in a concentration that exceeds the naturally occurring concentration of that constituent in the immediate vicinity of the facility (i.e., areas not affected by the facility).

"Extent of contamination," for the purposes of this permit, is defined as the horizontal and vertical areas in which the concentrations of hazardous constituents in the environmental media being investigated are above detection limits or background concentrations indicative of the region, whichever is appropriate as determined by the Department.

"Hazardous constituents," for the purposes of this permit, are those substances listed in ADEM Admin. Code Rule 335-14-2-Appendix VIII and/or ADEM Admin. Code Rule 335-14-5-Appendix IX and include hazardous constituents released from solid waste, hazardous waste, and hazardous waste constituents that are reaction by-products.

"Land Use Controls," for the purposes of this permit, is as defined by ADEM Admin. Code Rule 335-5-1-.03.

"Method detection limit" (MDL), for the purposes of this permit, means the minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

"Mixed waste," for the purposes of this permit, means a solid waste that is a mixture of hazardous waste (as defined in ADEM Admin. Code Rule 335-14-2-.01(3)) and radioactive waste (as defined in 10 CFR 61.2). The radioactive component of mixed waste is subject to regulation by the Atomic Energy Act (AEA)/Nuclear Regulatory Commission (NRC). The non-radioactive chemically hazardous component of mixed waste is subject to regulation by the AHWMA and ADEM Admin. Code Rule 335-14.

“Operating day,” for the purposes of this permit, means any day on which hazardous waste is treated, stored, or disposed of in a unit. For example, each day that a hazardous waste storage unit contains hazardous waste is an operating day; as is each day that a disposal unit contains or receives hazardous waste, or each day that hazardous waste is treated in a treatment unit.

"Release," for the purposes of this permit, includes any spilling, leaking, pouring, emitting, emptying, discharging, injecting, escaping, leaching, pumping, or disposing into the environment of any hazardous waste or hazardous constituent.

"Solid waste management unit" (SWMU), for the purposes of this permit, includes any unit that has been used for the treatment, storage or disposal of solid waste at any time, irrespective of whether the unit is or ever was intended for the management of solid waste. RCRA-regulated hazardous waste management units are also solid waste management units. SWMUs include areas that have been contaminated by routine and systematic releases of hazardous waste or hazardous constituents, excluding one-time accidental spills that are immediately remediated and cannot be linked to solid waste management activities (*e.g.*, product or process spills).

“Storm event,” for the purposes of this permit, is defined as a 1-year, 24-hour storm event or rainfall that measures 1 inch or greater in 1 hour or less. Rainfall measurements may be taken at the site, or the closest official weather monitoring station may be used.

I.E. EXPIRATION AND CONTINUATION OF PERMIT

This permit and all conditions herein will remain in effect beyond this permit's expiration date if the Permittee has submitted a new application as required by Permit Condition I.C.2. and, through no fault of the Permittee, the Department has not issued a new permit.

I.F. WASTE MINIMIZATION

1. Certification Requirements

Pursuant to ADEM Admin. Code Rule 335-14-5-.05(4)(b)9, the Permittee must certify, no less often than annually, that:

- a. The Permittee has a program in place to reduce the volume and toxicity of hazardous waste to the degree determined by the Permittee to be economically practicable; and,
- b. The proposed method of treatment, storage or disposal is the most practicable method available to the Permittee and that it minimizes the present and future threat to human health and the environment.

2. Recording Requirements

The Permittee shall maintain copies of this certification in the facility operating record as required by ADEM Admin. Code Rule 335-14-5-.05(4).

I.G. COST ESTIMATES

1. The Permittee shall maintain detailed written cost estimates, in current dollars, at the location specified in Permit Condition I.C.10.e. and on file with ADEM in accordance with ADEM Admin. Code Rules 335-14-5-.08(3), (5), and (10).
2. All cost estimates must be updated annually as required by ADEM Admin. Code Rules 335-14-5-.08(3)(b), 335-14-5-.08 (5)(b), and 335-14-5-.08 (10)(b).
3. The cost estimate shall be maintained and submitted in the form designated by the Department.
4. The Permittee must update the cost estimate no later than 30 calendar days after the Department has approved a modification to the Closure Plan, Post-Closure Plan, or Corrective Action Plan, or any other plan required or referenced by this permit, if the change in the plan results in an increase in the amount of the cost estimate.

I.H. FINANCIAL ASSURANCE

1. The Permittee shall demonstrate continuous compliance with ADEM Admin. Code Rule 335-14-5-.08 by providing documentation of financial assurance in at least the amount that equals or exceeds the cost estimate. Changes in financial assurance mechanisms must be approved by the Department.
2. The Permittee shall submit itemized statements for all capital expenditures and a complete, revised post-closure cost estimate to the Department when requesting approval for a reduction in the financial assurance mechanism.

I.I. PERMIT MODIFICATIONS

The Permittee shall request a permit modification whenever changes in operating plans or facility design affect any plan (e.g., closure, groundwater monitoring, post-closure, or corrective action) required or referenced by this permit. The Permittee must submit a written request for a permit modification pursuant to the requirements of ADEM Admin. Code Rule 335-14-8-.04(2), at least 60 calendar days prior to the proposed change in the facility design or operation.

I.J. REPORTS, NOTIFICATIONS, AND SUBMISSIONS TO THE DEPARTMENT

One hard copy and one electronic (an optical character recognition or text-searchable) copy of all reports, notifications, or other submissions that are required by this permit should be sent via certified mail or given to:

Chief, Land Division
Alabama Department of Environmental Management
P.O. Box 301463 (Zip 36130-1463)
1400 Coliseum Boulevard (Zip 36110-2059)
Montgomery, Alabama

and

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Director, RCRA Division
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street SW
Atlanta, Georgia 30303-3104

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PART II

GENERAL FACILITY CONDITIONS

II.A. GENERAL WASTE ANALYSIS

1. The Permittee shall comply with all requirements set forth under ADEM Admin. Code R. 335-14-5-.02(4) and shall follow the procedures in the waste analysis plan described in Section 2 of the permit application.
2. The Permittee shall utilize the methods specified in the waste analysis plan (Section 2 of the permit application), for the analysis of any of the wastes listed in the Part A Application. Modification of the waste analysis plan shall require a modification of this permit pursuant to ADEM Admin. Code R. 335-14-8-.04(2).
3. The Permittee shall subject samples from incoming waste shipments to the basic mandatory analyses identified in Section 2 of the permit application.
4. The Permittee shall classify waste as non-conforming when the receiving analysis does not match the information contained in the accompanying manifest, profile, and/or equivalent information as described in Section 2 of the permit application.
5. Before storing, treating, or disposing of a hazardous waste stream, the Permittee shall obtain a detailed chemical and physical analysis of a representative sample of the waste, as described in Section 2 of the permit application.

II.B. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection procedures and schedules, as described in Section 7 of the permit application.

II.C. RECORDKEEPING AND REPORTING

The Permittee shall comply with the requirements of ADEM Admin. Code R. 335-14-5-.05(4), (5), and (6).

II.D. CONTINGENCY PLAN

The Permittee shall immediately carry out the provisions of the Contingency Plan described in Section 3 of the permit application and follow the emergency procedures as required by ADEM Admin. Code R. 335-14-5-.04(2) whenever there is a fire, explosion, or release of hazardous waste or hazardous constituents.

II.E. WASTE REJECTION NOTIFICATION

The Permittee shall notify the Department in writing of all hazardous wastes which are rejected after being received at the facility. If the discrepancy is not resolved within fifteen (15) calendar days after receiving the waste the Permittee must submit a letter to the Department describing the discrepancy and attempts to resolve it along with a copy of the manifest and the applicable waste profile. If the discrepancy is not resolved within twenty-five (25) calendar days after receiving the waste, the Permittee must ship the rejected waste immediately to an alternate facility or back to the original generator and submit a *Waste Rejection Report* to the Department. The Waste Rejection Report shall include the following information:

1. The EPA Identification Numbers, name and addresses of the facility, the generator and transporter;
2. The reason and the date the facility rejected the waste;
3. A description and the quantity of each hazardous waste rejected by the facility with the copies of manifest(s) or shipping papers; and,
4. The certification (as required by ADEM Admin. Code R. 335-14-8-.02(2)(d)) signed by the owner or operator of the facility or his or her authorized representative.

II.F. PREPAREDNESS AND PREVENTION

The Permittee shall comply with ADEM Admin. Code R. 335-14-5-.03(3), (4), and at a minimum, shall equip the facility with the equipment set forth in the Contingency Plan described in Section 3 of the permit application.

II.G. MANIFEST SYSTEM

The Permittee shall comply with the requirements of ADEM Admin. Code R. 335-14-5-.05(2), (3), and (7).

PART III

MANAGEMENT IN CONTAINERS

III.A. PERMITTED OPERATIONS

The Permittee may operate the units and processes described in Table III.1. of this permit, subject to the terms of this permit. Operation of any process or unit not listed in Table III.1. of this permit, operation of any process in a unit or area other than that for which the process is listed, or exceedance of any capacity listed therein, for the treatment, storage, or disposal of hazardous waste is prohibited.

III.B. WASTE IDENTIFICATION

1. The Permittee may store and treat the hazardous wastes listed in Part A of the permit application in containers at the facility, subject to the terms of this permit. The storage or treatment of any hazardous waste not listed in Part A of the permit application is prohibited.
2. The Permittee shall not store or treat mixed waste in containers at the facility.

III.C. STORAGE IN CONTAINERS

1. The Permittee shall maintain and operate the container storage areas in accordance with the procedures specified in Section 5 of the permit application.
2. The container storage capacity is distributed among the various container storage areas as shown in Table III.1. of this permit, and as described in Section 10 of the permit application. The maximum quantity of hazardous waste stored in each unit or containment area shall not exceed the capacity listed in Table III.1. of this permit.
3. The sampling and staging of drums shall not exceed 72 hours. All containers that are to be fingerprinted or are awaiting analysis shall be segregated from other containers in the container storage area. Each container shall be marked with the date of receipt.

III.D. TREATMENT IN CONTAINERS

The Permittee shall treat hazardous waste in containers only in the container processing areas listed in this permit and as described in Section 9.2 of the permit application.

III.E. CONTAINMENT

1. The Permittee shall maintain the containment systems of the container storage and treatment areas in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.09(6)(b) , and as specified in Section 10 of the permit application.

2. The Permittee shall maintain an impervious coating which is free of cracks, gaps, or other deterioration on all containment system surfaces which may be exposed to hazardous wastes or hazardous constituents (or releases of hazardous wastes or hazardous constituents).

III.F. INSPECTIONS

The Permittee shall inspect areas where containers are stored or handled to detect leaking containers and deterioration of containers or containment systems and to ensure stacking is no more than two high as specified in Section 7 of the permit application and as required by ADEM Admin. Code R. 335-14-5-.09(5).

III.G. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

The Permittee shall comply with the specified requirements of Section 2 of the permit application and the requirements of ADEM Admin. Code R. 335-14-5-.09(7) and 335-14-5-.02(8).

III.H. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

The Permittee shall comply with the specified requirements of Section 2 of the permit application and the requirements of ADEM Admin. Code R. 335-14-5-.09(8) and 335 14-5-.02(8).

III.I. CLOSURE

1. Following the receipt of the final volume of hazardous wastes, the Permittee shall close the container storage and treatment areas in accordance with the requirements of the Closure Plan, Section 9 of the permit application, and Rules 335-14-5-.07(2) and 335-14-5-.09(9) of the ADEM Administrative Code.
2. If at closure not all waste and contaminated structures and soils at a unit can be removed or decontaminated, the Permittee shall close the container storage or treatment unit as a landfill and perform post-closure care as specified in ADEM Admin. Code R. 335-14-5-.09(9)(b) and 335-14-5-.14(11).

III.J. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (*e.g.*, severe rusting, apparent structural defects) or if it begins to leak, upon discovery the Permittee shall immediately transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of ADEM Admin. Code R. 335-14-5-.09(2).

TABLE III.1.
STORAGE OF CONTAINERS

UNIT NAME	QUANTITY (55-gal equivalent)	PERMITTED CAPACITY (gallons)	CONTAINMENT CAPACITY (gallons)	DESCRIPTION OF UNIT ¹
Building #1	1,840	101,200	89,757	Section 10.1
Building #4	420	23,100	36,939	Section 10.2
Building #2	1,780	97,900	13,397	Section 10.3
Building #3	960	52,800	13,464	Section 10.5
Total Capacities		275,000	153,557	

1. Location in the in the Application containing a description (text) or location (figure) of each unit.

PART IV
MANAGEMENT IN TANKS

IV.A. PERMITTED OPERATIONS

The Permittee may operate the units and processes described in Table IV.1. and IV.2. of this permit, subject to the terms of this permit. Operation of any process or unit not listed in Table IV.1. and IV.2. of this permit, operation of any process in a unit or area other than that for which the process is listed, or exceedance of any capacity listed therein, for the treatment, storage, or disposal of hazardous waste is prohibited.

IV.B. WASTE IDENTIFICATION

1. The Permittee may store and treat the hazardous wastes listed in Part A of the permit application in tanks at the facility, subject to the terms of this permit. The storage or treatment of any hazardous waste not listed in Part A of the permit application is prohibited.
2. The Permittee shall not store or treat mixed waste in tanks at the facility.

IV.C. STORAGE IN TANKS

1. The tank storage capacity is distributed among the various tanks and tank farms as shown in Table IV.1. of this permit, and as described in Section 10.4 of the permit application. The maximum quantity of hazardous waste stored in each unit or containment area shall not exceed the capacity listed in Table IV.1. of this permit.
2. The Permittee shall maintain and operate the tank storage areas in accordance with the procedures specified in Section 6 of the permit application and in ADEM Admin. Code R. 335-14-5-.10.
3. The maximum combined quantity of hazardous and non-hazardous waste stored in a given area shall not exceed ten times the capacity of the containment system for that area. The maximum combined quantity of hazardous and non-hazardous waste stored in an individual tank in a given area shall not exceed the capacity of the containment system for that area.

IV.D. TREATMENT IN TANKS

1. The Permittee shall comply with the tank treatment process and capacity restrictions listed in Table IV.2. of this permit.
2. The Permittee shall ensure that structural integrity of tanks, and processes of treatment are in accordance with Section 6 of the permit application.

3. The Permittee shall not substitute dilution of chemicals for treatment, except as allowed by ADEM Admin. Code R. 335-14-9-.01(3).
4. The Permittee shall ensure that all chemical reactions have sufficiently occurred to prevent subsequent uncontrolled reactions before the process is stopped.
5. The Permittee shall manage all treatment residues in accordance with all applicable provisions of ADEM Admin. Code R. 335-13 and/or 335-14.
6. The Permittee shall enter records of all treatment activities, including hazardous waste numbers and descriptions, quantities, method(s) of treatment, and date(s) of treatment, into the operating record for each batch of waste treated.

IV.E. INSTALLATION REQUIREMENTS

The tank system must be installed in accordance with Section 6 of the permit application and ADEM Admin. Code R. 335-14-5-.10(3).

IV.F. GENERAL OPERATING REQUIREMENTS

The Permittee shall comply with the tank-operating requirements of ADEM Admin. Code R. 335-14-5-.02(6), 335-14-5-.10(2), 335-14-5-.10(5)(a), 335-14-5-.10(5)(b), 335-14-5-.10(5)(c), and 335-14-5-.10(6)(b).

IV.G. SECONDARY CONTAINMENT REQUIREMENTS

The Permittee shall maintain the secondary containment systems for all storage and/or treatment tanks and for all ancillary equipment as specified in Section 6 of the permit application and in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.10(4).

IV.H. INSPECTIONS

1. The Permittee shall inspect each tank system (to include the ancillary equipment and secondary containment) and the area surrounding each tank as specified in Section 7 of the permit application and in accordance with the requirements of ADEM Admin. Code R. 335-14-5-.10(6).
2. The Permittee must document in the operating record of the facility the results of inspection required by Condition IV.H.1.

IV.I. RESPONSE TO LEAKS OR SPILLS

The Permittee shall comply with the requirements of ADEM Admin. Code R. 335-14-5-.10(7).

IV.J. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

The Permittee shall comply with the requirements specified in Section 2 of the permit application and ADEM Admin. Code R. 335-14-5-.10(9).

IV.K. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

The Permittee shall comply with the requirements specified in Section 2 of the permit application and ADEM Admin. Code R. 335-14-5-.10(10).

IV.L. CLOSURE

1. Following the receipt of the final volume of hazardous waste, the Permittee shall close the tank in accordance with the Closure Plan contained in Section 9 of the permit application and as required by ADEM Admin. Code R. 335-14-5-.10(8).
2. If at closure not all contaminated soils can be practically removed or decontaminated, the Permittee shall close the tank as a landfill and perform post-closure care as specified in ADEM Admin. Code R. 335-14-5-.10(8)(b).

TABLE IV.1.
STORAGE IN TANKS

UNIT NAME	QUANTITY	PERMITTED CAPACITY (gallons)	CONTAINMENT CAPACITY (gallons)	DESCRIPTION OF UNIT ¹
Storage Tanks	6 x 15k gallons	90,000	41,833	Section 10.4

1. Location in the in the application containing a description (text) or location (figure) of each unit.

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TABLE IV.2.
TREATMENT IN TANKS

TREATMENT PROCESS ²	QUANTITY	PERMITTED CAPACITY (gallons)	CONTAINMENT CAPACITY (gallons)	DESCRIPTION OF UNIT ¹
Treatment in Tanks	6 x 15k gallons	90,000	41,833	Section 10.4

1. Location in Application containing description (text), location (figure) of process/unit.
2. The same units as in Table IV.1.

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PART VI

SOLID WASTE MANAGEMENT UNIT IDENTIFICATION AND EVALUATION

VIA. APPLICABILITY

The Conditions of this Part apply to:

1. The solid waste management units (SWMUs) and areas of concern (AOCs) identified in Table VI.1, which require investigation and/or remediation;
2. The SWMUs identified in Table VI.2, which require no further investigation under this permit at this time;
3. Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means; and,
4. Contamination beyond the facility boundary, if applicable. The Permittee shall implement corrective actions beyond the facility boundary where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Department that, despite the Permittee's best efforts, as determined by the Department, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis. Assurances of financial responsibility for completion of such off-site corrective action will be required.

VI.B. NOTIFICATION AND ASSESSMENT REQUIREMENTS FOR NEWLY IDENTIFIED SWMUs AND AOCs

1. The Permittee shall notify the Department in writing, within 15 calendar days of discovery, of any additional AOC(s) as described under Permit Condition VIA.3. The notification shall include, at a minimum, the location of the AOC(s) and all available information pertaining to the nature of the release (*e.g.*, media affected, hazardous constituents released, magnitude of release, *etc.*). If the Department determines that further investigation of an AOC is required, the permit will be modified in accordance with ADEM Admin. Code Rule 335-14-8-.04(2).
2. The Permittee shall notify the Department in writing, within 15 calendar days of discovery, of any additional SWMUs as described under Permit Condition VIA.3.
3. The Permittee shall prepare and submit to the Department, within 90 calendar days of notification, a SWMU Assessment Report (SAR) for each SWMU identified under Permit Condition VI.B.2. At a minimum, the SAR shall provide the following information:
 - a. Location of unit(s) on a topographic map of appropriate scale such as required under ADEM Admin. Code Rule 335-14-8-.02(5)(b)19.

- b. Designation of type and function of unit(s).
 - c. General dimensions, capacities and structural description of unit(s) (supply any available plans/drawings).
 - d. Dates that the unit(s) was operated.
 - e. Specification of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous constituents in the wastes.
 - f. All available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s) (to include groundwater data, soil analyses, air, and/or surface water data).
4. Based upon the results of the SAR, the Department shall determine the need for further investigations at the SWMUs covered in the SAR. If the Department determines that such investigations are needed, the Permittee shall initiate an investigation as outlined in Permit Condition VI.D.1 immediately upon receiving notification of the Department's determination.

VI.C. NOTIFICATION REQUIREMENTS FOR NEWLY DISCOVERED RELEASES AT PREVIOUSLY IDENTIFIED SWMUs or AOCs

1. The Permittee shall notify the Department in writing of any newly discovered release(s) of hazardous waste or hazardous constituents discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, within 15 calendar days of discovery. Such newly discovered releases may be from SWMUs or AOCs identified in Permit Condition VI.A.2 or SWMUs or AOCs identified in Permit Condition VI.A.3 for which further investigation was not required.
2. If the Department determines that further investigation of the SWMUs or AOCs is needed, the Permittee shall initiate an investigation as outlined in Permit Condition VI.D.1 immediately upon receiving notification of the Department's determination.

VI.D. RCRA FACILITY INVESTIGATION (RFI)

1. The Permittee must perform a RCRA Facility Investigation (RFI) for any SWMU and AOC identified by the Department in accordance with Permit Conditions VI.A.1, VI.B.4, and VI.C.2.
2. The RFI must completely identify the concentration of hazardous constituents released from each SWMU and AOC and fully delineate the area where such hazardous constituents have come to be located.
3. The RFI must fully characterize the nature and extent of contamination released from each SWMU or AOC under investigation.
4. The RFI must be performed in a manner consistent with the most recent edition of the Alabama Environmental Investigation and Remediation Guidance.

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5. Except as provided by Permit Condition VI.D.6., the RFI must be completed within 180 calendar days from the effective date of this permit, or, for SWMUs or AOCs identified pursuant to Permit Condition VI.B. and C., within 180 calendar days from the receipt of notification from the Department that an RFI is required. If, prior to the effective date of this permit, the Department has approved a work plan that includes a schedule for completing the RFI, the RFI shall be completed in accordance with the approved schedule.

6. RFI Schedule of Compliance
 - a. For RFIs expected to require greater than 180 calendar days to complete, the Permittee may submit a schedule of compliance subject to Departmental approval and/or modification.
 - b. Submittal of an RFI Schedule of Compliance does not delay or otherwise postpone the Permittee's obligation to initiate the RFI.
 - c. The Schedule of Compliance must include:
 - i. A detailed narrative discussion which explains why the RFI cannot be completed within 180 days; and,
 - ii. A detailed and chronological listing of milestones, with estimated durations that provides sufficient information to track the progress of the investigation.
 - d. The RFI Schedule of Compliance shall be reviewed by the Department in accordance with Permit Condition VI.G.
 - e. The Permittee shall complete the RFI in accordance with the approved RFI Schedule of Compliance.

7. RFI Progress Reports
 - a. For an RFI being conducted in accordance with the approved RFI Schedule of Compliance, the Permittee must submit progress reports on a monthly basis.
 - b. The RFI Progress Reports must include:
 - i. A description of the RFI activities completed during the reporting period;
 - ii. Summaries of any problems or potential problems encountered during the reporting period;
 - iii. Actions taken to rectify problems;
 - iv. Changes in relevant personnel;
 - v. Projected work for the next reporting period;

- vi. Any proposed revisions to the RFI Schedule of Compliance. Modifications of the RFI Schedule of Compliance are subject to approval by the Department; and,
 - vii. A summary of any data collected during the reporting period, including:
 - I. The location of each sampling point identified on a site map;
 - II. The concentration of each hazardous constituent detected at each sampling point; and,
 - III. Submittal of RFI Progress Reports, work plans, or other documents during the RFI does not alter the approved RFI Schedule of Compliance.
8. RFI Reports
- a. The Permittee shall prepare and submit to the Department an RFI Report within 60 calendar days from the completion of investigation activities in accordance with the approved RFI Schedule of Compliance, if applicable.
 - b. The RFI Report must provide a detailed description of all required elements of the investigation as described in the most recent edition of the Alabama Environmental Investigation and Remediation Guidance.
 - c. The RFI Report shall be reviewed by the Department in accordance with Permit Condition VI.G.

VI.E. SELECTION OF CORRECTIVE MEASURES AND PERMIT MODIFICATION

- 1. The Permittee shall develop and submit to the Department a Corrective Measures Implementation (CMI) Plan for any areas of the Permittee's site where hazardous constituents have come to be located at concentrations exceeding those appropriate for the protection of human health and the environment. The CMI Plan must include all applicable elements of the proposed remedy pursuant to the most recent edition of the Alabama Environmental Investigation and Remediation Guidance.
- 2. The CMI Plan shall be submitted to the Department within 120 calendar days following the Permittee's submittal of the RFI Report indicating that hazardous constituents have come to be located at any area of the Permittee's facility, or beyond the facility, at concentrations exceeding those appropriate for the protection of human health and the environment, or within 120 calendar days following notification from the Department that a CMI Plan is required, whichever occurs earlier.
- 3. The CMI Plan shall be submitted along with a request for permit modification pursuant to ADEM Admin. Code R. 335-14-8-.04(2), and shall include any applicable fees pursuant to ADEM Admin. Code R. 335-1-6. This modification will serve to incorporate the proposed final remedy, including all procedures necessary to implement and monitor the remedy, into this permit.

4. Within 120 calendar days after this Permit has been modified in accordance with Permit Condition VI.E.2., the Permittee shall demonstrate financial assurance for completing the approved remedy.

VI.F. INTERIM MEASURES (IM)

1. IM Work Plan(s)
 - a. Upon notification by the Department, the Permittee shall prepare and submit an Interim Measures (IM) Work Plan for any SWMU or AOC that the Department determines is necessary. IM are necessary in order to minimize or prevent further migration of contaminants and limit human and environmental exposure to contaminants while long-term corrective measures are evaluated and, if necessary, implemented. The IM Work Plan shall be submitted within 30 calendar days of such notification and shall include the elements listed in Permit Condition VI.F.1.b. Such IM may be conducted concurrently with investigations required under the terms of this permit. The Permittee may initiate IM by submitting an IM Work Plan for approval and reporting in accordance with the requirements under Permit Condition VI.F.
 - b. The IM Work Plan shall ensure that the IM are designed to mitigate any current or potential threat(s) to human health or the environment and is consistent with and integrated into any long-term solution at the facility. The IM Work Plan shall include: the IM objectives, procedures for implementation (including any designs, plans, or specifications), and schedules for implementation.
 - c. The IM Work Plan must be approved by the Department, in writing, prior to implementation. The Department shall specify the start date of the IM Work Plan schedule in the letter approving the IM Work Plan.
 - d. The IM Report shall be reviewed by the Department in accordance with Permit Condition VI.G.
2. IM Implementation
 - a. The Permittee shall implement the IM in accordance with the approved IM Work Plan.
 - b. The Permittee shall give notice to the Department as soon as possible of any planned changes, reductions or additions to the IM Work Plan.
 - c. Final approval of corrective action required under ADEM Admin. Code Rule 335-14-5-.06(12), which is achieved through IM, shall be in accordance with ADEM Admin. Code Rule 335-14-8-.04(2) and Permit Condition VI.E.
3. IM Reports
 - a. If the time required for completion of IM is greater than one year, the Permittee shall provide the Department with Progress Reports at intervals specified in the approved work plan. The Progress Reports shall, at a minimum, contain the following information:

- i. A description of the portion of the IM completed;
 - ii. Summaries of any deviations from the IM Work Plan during the reporting period;
 - iii. Summaries of any problems or potential problems encountered during the reporting period;
 - iv. Projected work for the next reporting period; and,
 - v. Copies of laboratory/monitoring data.
- b. The Permittee shall prepare and submit the IM Report to the Department within 90 calendar days of completion of IM conducted under Permit Condition VI.F. The IM Report shall, at a minimum, contain the following information:
- i. A description of IM implemented;
 - ii. Summaries of results;
 - iii. Summaries of all problems encountered;
 - iv. Summaries of accomplishments and/or effectiveness of IM; and,
 - v. Copies of all relevant laboratory or monitoring data, *etc.* in accordance with Permit Condition I.C.10.

VI.G. SUBMITTALS

1. All work plans, reports, schedules, and other documents ("submittals") required by this permit shall be subject to approval by the Department to assure that such submittals and schedules are consistent with the requirements of this Permit and with applicable regulations and guidance. The Permittee shall revise all submittals and schedules as directed by the Department.
2. The Department will review all submittals in accordance with the conditions of this permit. The Department will notify the Permittee in writing of any submittal that is disapproved, and the basis therefore. If the Department disapproves a submittal, the Department shall (1) notify the Permittee in writing of the submittal's deficiencies and specify a due date for submission of a revised submittal, (2) revise the submittal and notify the Permittee of the revisions, or (3) conditionally approve the submittal and notify the Permittee of the conditions. Permit Condition VI.H. shall apply only to submittals that have been disapproved and revised by the Department, or that have been disapproved by the Department, then revised and resubmitted by the Permittee, and again disapproved by the Department.
3. All submittals shall be submitted within the time frame specified by the Department and in accordance with the approved schedule of compliance. Extensions of the due date for submittals may be granted by the Department based on the Permittee's demonstration that sufficient justification for the extension exists.

4. All submittals required by this permit shall be signed and certified in accordance with ADEM Admin. Code Rule 335-14-8-.02(2).
5. Two (2) copies of all submittals shall be provided by the Permittee to the Department in accordance with Permit Condition I.J.

VI.H. DISPUTE RESOLUTION

Notwithstanding any other provision in this permit, in the event the Permittee disagrees, in whole or in part, with the Department's revision of a submittal or disapproval of any revised submittal required by this Part, the following may, at the Permittee's discretion apply:

1. In the event that the Permittee chooses to invoke the provisions of this section, the Permittee shall notify the Department in writing within 30 calendar days of receipt of the Department's revision of a submittal or disapproval of a revised submittal. Such notice shall set forth:
 - a. The specific matters in dispute;
 - b. The position the Permittee asserts should be adopted as consistent with the requirements of this permit;
 - c. The basis for the Permittee's position; and,
 - d. Any matters considered necessary for the Department's determination.
2. The Department and the Permittee shall have an additional 30 calendar days from the Department's receipt of the notification provided for in Permit Condition VI.H.1. to meet or confer to resolve any disagreement.
3. In the event agreement is reached, the Permittee shall submit and implement the revised submittal in accordance with and within the time frame specified in such agreement.
4. If agreement is not reached within the 30-day period, the Department will notify the Permittee in writing of his/her decision on the dispute, and the Permittee shall comply with the terms and conditions of the Department's decision in the dispute. For the purposes of this provision in this permit, the responsibility for making this decision shall not be delegated below the Land Division Chief.
5. With the exception of those conditions under dispute, the Permittee shall proceed to take any action required by those portions of the submission and of this permit that the Department determines are not affected by the dispute.

Table VI.1

The following Solid Waste Management Unit(s) (SWMU) and/or Area(s) of Concern (AOC) numbers and descriptions correspond with those noted in the RCRA Facility Assessment (RFA) Report. Where discrepancies exist, the permit will take precedence.

List of SWMUs and AOCs requiring a RCRA Facility Investigation (RFI):

SWMU/AOC NUMBER	SWMU/AOC NAME	POTENTIALLY AFFECTED MEDIA
1	1	1

¹ At this time there is no unit which requires an RFI.

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Table VI.2

The following Solid Waste Management Unit(s) (SWMU) and/or Area(s) of Concern (AOC) numbers and descriptions correspond with those noted in the RCRA Facility Assessment (RFA) Report. Where discrepancies exist, the permit will take precedence.

List of SWMUs and AOCs requiring no further action at this time:

SWMU/AOC NUMBER	SWMU/AOC NAME	POTENTIALLY AFFECTED MEDIA
1	Storm Drain Inlet, near pumping sump at Tank Farm	None
2	Pumping Station near Tank Farm	None
3A	Truck Loading/Unloading Area	None
3	Tank Farm Containment Area	None
4	Drum Storage Area	None
5	Drum Emptying Vat #1	None
6	Drum Emptying Vat #2	None
7	Dispersion Tub #1	None
8	Dispersion Tub #2	None
9	Roll-Off Box	None
10	Generator Storage Building	None
11	Plant Laydown Area	None
15	Drum Reclaiming Area (Quonset Hut)	None
16	Vehicle Maintenance Area (Quonset Hut)	None

PART VI
CORRECTIVE MEASURES IMPLEMENTATION

VI.A. APPLICABILITY

The conditions of this Part apply to SWMUs and AOCs identified in Table VI.1.

VI.B. GENERAL CONDITIONS

1. The Permittee is required to perform corrective measures for the SWMUs and AOCs identified in Condition VI.A. The approved remedy for these defined units, waterway areas, or land parcels, includes any and all actions set forth in this permit and in the approved Interim Measures Plans, Corrective Measures Studies (CMSs), and Corrective Measures Implementation (CMI) Plans approved by the Department, as noted below:

Table VI.1.

Applicable SWMU/AOC*	CMS/CMI	Approval Date
*	*	*

* Currently no SWMU/AOC is subject to a CMS or CMI Plan.

2. Remedial Cleanup Levels

Upon approval, pursuant to Condition VI.E., of a CMI Plan designating applicable cleanup level(s), the cleanup level(s) for the areas specific to the CMI Plan will be deemed to be a condition of this permit.

3. Groundwater Monitoring and Remediation

Where required pursuant to Conditions VI.B.1. and VI.C. of this permit, the Permittee shall comply with the general groundwater monitoring requirements of this permit.

4. Land Use Controls

Where required pursuant to Conditions VI.B.1. and VI.C. of this permit, the Permittee shall establish appropriate land use controls to achieve protection of human health and the environment. The Permittee shall comply with Conditions VI.B.5. and VI.B.6. of this permit when implementing corrective measures requiring land use controls. Where the owner of such property will not allow an environmental covenant to be imposed, the Permittee shall notify the Department within 14 calendar days of receipt of written notification by the property owner. In such cases, the Department may allow the Permittee to propose an alternate area-specific land use control, subject to the Department's review and approval.

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5. Survey Plat

For corrective measures where residual concentrations of contaminants will remain in-place at levels greater than those appropriate for unrestricted land use, or for corrective measures that rely on land use controls, the Permittee must:

- a. Within 90 calendar days following the effective date of a permit modification addressing remedy selection, submit to the local zoning authority, or the authority with jurisdiction over local land use, and to the Department, a survey plat indicating the location and dimensions of the SWMUs, AOCs, and capped or partially remediated areas with respect to permanently surveyed benchmarks, the locations of sampling points, and the concentrations of hazardous constituents detected. This plat must be prepared and certified by a professional land surveyor registered in the State of Alabama. The plat must be filed with the local zoning authority or the authority with jurisdiction over local land use and must contain a note, prominently displayed, which states the Permittee's obligation to limit the property to the specified restricted uses.
- b. Maintain the survey plat as described in Condition VI.B.5.a. of this permit until the Permittee has demonstrated, to the satisfaction of the Department, that the levels of hazardous constituents in all contaminated media are within limits appropriate for unrestricted land uses.

6. Environmental Covenant

No later than the submission of the survey plat required in Condition VI.B.5.b., the Permittee must:

- a. Record in the probate judges office of the county in which the property is located or portion thereof an environmental covenant in accordance with ADEM Admin. Code Rule 335-5 that will in perpetuity notify any potential purchaser of the property that:
 - i. The land is contaminated with hazardous constituents in concentrations that exceed unrestricted use standards;
 - ii. The use of the property is restricted by this permit for certain residential, municipal, or industrial purposes and may lead to an increased risk of exposure to hazardous constituents depending upon the activities initiated at the site. Such activities may yield an increased level of human health risk to the owner;
 - iii. The potential purchaser or entity that desires to work in the contaminated area should notify the Permittee before mobilizing to the area covered by the land use control.
- b. Submit to the Department a certification, signed by the Permittee in accordance with Permit Condition I.C.11. that the environmental covenant specified in this part has been performed. This certification must include a copy of the document in which the notation has been placed.

- c. Maintain the environmental covenant described in Permit Condition VI.B.6. until the Permittee has demonstrated, to the satisfaction of the Department, that the levels of hazardous constituents in all contaminated media are within limits appropriate for unrestricted land uses.

7. Security

Security measures, where required by Conditions VI.B.1. and VI.C., of this permit will be conducted in accordance with ADEM Admin. Code R. 335-14-5-.02(5)(b)2.(ii) and as prescribed in the approved CMI Plan.

8. Inspection

Where corrective measures addressed in Conditions VI.B.1. include provisions to cap in place or partially remediate properties or land areas, whether owned or not owned by the Permittee, the Permittee shall specify inspection protocols on a scheduled basis to ensure continued integrity of the remedy and to ensure that land use remains appropriately restricted per the environmental covenant established pursuant to Permit Condition VI.B.6. Inspection provisions shall be as prescribed in the approved CMI Plan.

VI.C. AREA SPECIFIC CONDITIONS [RESERVED]

VI.D. CORRECTIVE MEASURES IMPLEMENTATION (CMI) REPORTS

1. CMI Progress Reports

If the time required to complete implementation of a specific set of corrective measures, as described in the Department-approved CMI Plan, is greater than 180 calendar days, the Permittee shall provide ADEM with progress reports according to the approved schedule in the CMI Plan. The progress reports shall, at a minimum, contain the following information:

- a. A description of the portion of CMI completed;
- b. Summaries of and deviations from the approved CMI during the reporting period;
- c. Summaries of current and potential problems, including recommended solutions and alternatives as well as corrective actions undertaken;
- d. Any monitoring data (soil, air, dust, water) collected for any reason during the construction period for the purposes of monitoring potential for human and ecological exposure; and
- e. Projected work for the next period and impacts to the approved schedule.

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2. Final CMI Reports

Upon completion of construction of corrective measures systems, implementation of land use controls, interim removal actions, or other short-term activities required by this permit and/or the approved CMI Plan, the Permittee shall submit to the Department a Final CMI Report containing, at a minimum, the following:

- a. A description of activities completed;
- b. For cap and cover remedies, as-built construction drawings presenting the final in-place three-dimensional location of contaminated material. A plan view of the remediated areas shall be presented in addition to a cross section of the in-place capped areas;
- c. Hazardous waste manifests indicating the handling of any excavated material that has been shipped off-site to a Department approved, certified landfill;
- d. For remedies involving land use controls, a copy of the survey plat and environmental covenant required by Condition VI.B. of this permit;
- e. Monitoring data (soil, air, dust, water) collected for any reason during the construction period for the purposes of monitoring potential for human and ecological exposure; and
- f. Certification, prepared in accordance with ADEM Admin. Code Rule 335-14-8-02(2)(d) by the Permittee and an independent professional engineer registered in the State of Alabama, that the corrective measures implementation phase (*i.e.*, construction) required by this permit is complete and that the approved system and/or facilities are ready for operation in accordance with the intended design (*i.e.*, CMI Plan).

3. Corrective Measures (CM) Effectiveness Reports

- a. For corrective measures that have been fully implemented and where the corrective measures system must operate for a period of time to achieve cleanup goals or levels, the Permittee shall submit CM Effectiveness Reports annually unless otherwise approved by the Department, beginning 180 days following the Department's approval of the Final CMI Report. The CM Effectiveness Reports shall include, at a minimum the following:
 - i. A detailed narrative presenting an evaluation of the effectiveness of the selected remedy;
 - ii. Summaries of compliance with and progress toward achieving cleanup goals;
 - iii. Any significant revisions, adjustments, or proposed modifications to the selected remedy;

- iv. Tabulated environmental sampling and monitoring data including, but not limited to, groundwater quality, elevation data, and a graphical representation of all constituents detected during each sampling event from recovery wells, monitoring wells, drinking water wells, and other locations;
 - v. Chain of custody, field reports, and laboratory data sheets to include the date of collection, the date the sample was extracted, and the date of sample analysis for samples collected during the reporting period;
 - vi. Any monitoring data (soil, air, dust, water) collected for any reason during the post-construction period for the purposes of monitoring potential for human and ecological exposure;
 - vii. Isoconcentration maps depicting the distribution of parameters for each sampling event;
 - viii. Time versus concentration plots for each monitoring parameter for each recovery well and a representative number of effectiveness wells;
 - ix. Tabulated volumetric data on groundwater pumped and pumping rates (monthly and cumulative) for each recovery well;
 - x. Records of any groundwater recovery system operation time, including shutdown periods, not including any minor (less than 24 hours) shutdowns for repairs, maintenance, etc.;
 - xi. Potentiometric surface maps;
 - xii. Description of land use during the reporting period at the designated area requiring corrective measures; and
 - xiii. Findings of the Permittee's investigation into the continued effectiveness of land use controls per Condition VI.C.
- b. If at any time the Permittee determines that any remedy selection specified in Condition VI.B or VI.C. of this permit no longer satisfies the applicable requirements of ADEM Admin. Code R. 335-14-5-.06(12) or this permit for releases of hazardous waste or hazardous constituents originating from SWMUs or AOCs, the Permittee must, within 90 calendar days, submit an application for a permit modification, pursuant to Permit Condition I.I, to make any appropriate changes to the CMI Plan.
- c. The application for changes in the CMI Plan, including changes in inspection and monitoring provisions of the CMI Plan, shall be submitted as an application for a permit modification pursuant to the requirements of ADEM Admin. Code R. 335-14-8-.04.

4. Final Report of Corrective Measures

Within 90 calendar days following attainment of cleanup levels or goals as outlined in this Permit and the approved CMI Plan, the Permittee shall submit to the Department a Final Report of Corrective Measures (FRCM). The FRCM shall contain a certification by the Permittee and an Alabama-registered independent professional engineer that all remedial measures required by this permit and the approved CMI Plan have been completed. The FRCM shall outline any procedures and schedules for dismantling of corrective measures systems, groundwater monitoring or recovery systems, removal of land use controls, and any other remedial systems or controls required by this permit or the approved CMI Plan.

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PART VII**SUMMARY OF DEADLINES**

The summary information provided herein is intended only as a guide to the requirements of this permit. It is not intended to be all inclusive, nor is it intended to be used as a substitute for the full text of this permit.


<u>PERMIT CONDITION</u>	<u>ITEM</u>	<u>DUE DATE</u>
I.C.2.a.	Reapply for a renewal	180 calendar days before the expiration of the current permit.
I.C.12.a.	Give notice to the Department of any planned physical alterations or additions to the permitted facility and any solid waste management units.	As soon as possible
I.C.12.f.	Report any noncompliance with this permit that may endanger human health or the environment.	Orally within 24 hours from the time the Permittee becomes aware of the circumstances. Written submission shall also be provided within 5 calendar days of the time that the Permittee becomes aware of the circumstances
I.F.	Waste Minimization Certification	Annually
I.G.	Update cost estimates	No later than 30 calendar days after the Department has approved a modification to the Closure Plan, Post-Closure Plan, or Corrective Action Plan, or any other plan required or referenced by this permit, if the change in the plan results in an increase in the amount of the cost estimate and annually as required by ADEM Admin. Code Rule 335-14-5-.08(3)(b), (5)(b), and (10)(b)
I.I.	Submit a written request for a permit modification pursuant to the requirements of ADEM Admin. Code Rule 335-14-8-.04(2).	At least 60 calendar days prior to a proposed change in facility design or operation.
V.B.1.	Notify the Department, in writing, of the discovery of any additional AOCs.	Within 15 calendar days of discovery.
V.B.2.	Notify the Department, in writing, of the discovery of any additional SWMUs.	Within 15 calendar days of discovery
V.B.3.	Submit a SWMU Assessment Report (SAR) for each SWMU identified under VII.B.2.	Within 90 calendar days of notification.

<u>PERMIT CONDITION</u>	<u>ITEM</u>	<u>DUE DATE</u>
V.C.1.	Notify the Department, in writing, of any newly discovered release(s) of hazardous waste or hazardous constituents from SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means.	Within 15 calendar days of discovery.
V.D.7.	Submit monthly RFI progress reports.	Monthly basis beginning in the second month following the initiation of the RFI.
V.D.8.	Submit RFI Report	Within 60 days from the completion of investigation activities.
V.E.2.	Submit CMI Plan	Within 120 days following the Permittee's submittal of the RFI Report indicating that hazardous constituents have come to be located at any area of the Permittee's facility, or beyond the facility, at concentrations exceeding those appropriate for the protection of human health and the environment, or within 120 days following notification from the Department that a CMI Plan is required, whichever occurs earlier.
V.E.4.	Demonstrate financial assurance for completing the approved remedy.	Within 120 calendar days after this Permit has been modified in accordance with Permit Condition VII.E.2.
V.F.3.	Submit IM Report	Within 90 calendar days of completion of IM.



CLEAN EARTH OF ALABAMA, INC.

402 WEBSTER CHAPEL ROAD
Glencoe, AL 35905

<p>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>	
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1. Reason for Submittal (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility and/or generator of > 1,000 kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input checked="" type="checkbox"/>	Submitting a new or revised Part A Form

2. Site EPA ID Number

A	L	D	9	8	1	0	2	0	8	9	4
---	---	---	---	---	---	---	---	---	---	---	---

3. Site Name

Clean Earth of Alabama, INC.

4. Site Location Address

Street Address	402 Webster Chapel Road		
City, Town, or Village	Glencoe	County	Etowah
State	Alabama	Country	USA
		Zip Code	35905

5. Site Mailing Address

Same as Location Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

6. Site Land Type

<input checked="" type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
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7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary) 562211	C. 562112
B. 562111	D.

8. Site Contact Information

Same as Location Address

First Name John	MI	Last Name Black
Title General Manager		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email jblack@cleaneearthinc.com		
Phone 256.492.8340	Ext 102	Fax

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

Same as Location Address

Full Name Clean Earth Inc.	Date Became Owner (mm/dd/yyyy) 6/1/2016
Owner Type <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address 334 S. Warminster Road	
City, Town, or Village Hatboro	
State Pennsylvania	Country USA Zip Code 19040
Email	
Phone 215.734.1400	Ext Fax
Comments	

B. Name of Site's Legal Operator

Same as Location Address

Full Name Clean Earth of Alabama, Inc.	Date Became Operator (mm/dd/yyyy) 6/1/2016
Operator Type <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address	
City, Town, or Village	
State	Country Zip Code
Email	
Phone	Ext Fax
Comments	

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

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

A. Hazardous Waste Activities

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
<input checked="" type="checkbox"/>	a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
<input type="checkbox"/>	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
<input type="checkbox"/>	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
If "Yes" above, indicate other generator activities in 2 and 3, as applicable.		
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Mixed Waste (hazardous and radioactive) Generator	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	4. Treater, Storer or Disposer of Hazardous Waste—Note: A hazardous waste Part B permit is required for these activities.	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	5. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. Recycler of Hazardous Waste	
<input type="checkbox"/>	a.	Recycler who stores prior to recycling
<input type="checkbox"/>	b.	Recycler who does not store prior to recycling
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	7. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
<input type="checkbox"/>	a.	Small Quantity On-site Burner Exemption
<input type="checkbox"/>	b.	Smelting, Melting, and Refining Furnace Exemption

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

See	List					

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

11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)**A. Other Waste Activities**

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input checked="" type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

B. Universal Waste Activities

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input checked="" type="checkbox"/>	a. Batteries
<input type="checkbox"/>	b. Pesticides
<input checked="" type="checkbox"/>	c. Mercury containing equipment
<input checked="" type="checkbox"/>	d. Lamps
<input type="checkbox"/>	e. Other (specify) _____
<input type="checkbox"/>	f. Other (specify) _____
<input type="checkbox"/>	g. Other (specify) _____
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input checked="" type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
<input type="checkbox"/>	b. Marketer Who First Claims the Used Oil Meets the Specifications

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories—If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or univer-
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Withdrawing from 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator.
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14. LQG Consolidation of VSQG Hazardous Waste

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.
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15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. <input type="checkbox"/> Central Accumulation Area (CAA) <input type="checkbox"/> Entire Facility	
B. Expected closure date: _____ mm/dd/yyyy	
C. Requesting new closure date: _____ mm/dd/yyyy	
D. Date closed : _____ mm/dd/yyyy	
<input type="checkbox"/> 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)	
<input type="checkbox"/> 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)	

16. Notification of Hazardous Secondary Material (HSM) Activity

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27)? If “Yes”, you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Are you notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate? If “Yes”, you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

17. Electronic Manifest Broker


<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
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18. Comments (include item number for each comment)

19. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
	6/5/2019
Printed Name (First, Middle Initial Last) John Black	Title General Manager
Email jblack@cleanearthinc.com	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	

United States Environmental Protection Agency HAZARDOUS WASTE PERMIT PART A FORM	
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1. Facility Permit Contact

First Name Bryan	MI C	Last Name Jones
Title Area EH&S Manager		
Email bjones@cleanearthinc.com		
Phone 256.492.8340	Ext 105	Fax

2. Facility Permit Contact Mailing Address

Street Address 402 Webster Chapel Road		
City, Town, or Village Glencoe		
State Alabama	Country USA	Zip Code 35905

3. Facility Existence Date (mm/dd/yyyy)

9/30/1986

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
N	A L 0 0 6 6 2 1 4	NPDES STORM WATER PERMIT
T	A L D 9 8 1 0 2 0 8 9 4	AL HAZ WASTE TRANSPORTATION

5. Nature of Business

CEA is a TSDF that specializes in fuel blending, consolidating/bulking, lab packs, shredding of waste pharmaceuticals.

6. Process Codes and Design Capacities

Line Number	A. Process Code				B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0 1	S 0 1	275,000	G	004	CONTAINER STORAGE			
0 2	S 0 2	90,000	G	006	15,000 gal each tank			
0 3	T 0 1	90,000	U	006	15,000 each tank-FUEL BL			
0 4	T 0 4	14,000	J	002	SHREDDER			

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

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (if code is not entered in 7.D1))
					See Attached List

8. Map

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

9. Facility Drawing

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

10. Photographs

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

11. Comments

EPA ID# | A | L | D | 9 | 8 | 1 | 0 | 2 | 0 | 8 | 9 | 4 |

7. Description of Hazardous Wastes

Line#	A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES	
							(1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
1	D	0	0	1	5,000	T	S01, S02, T01, T04	
2	D	0	0	2	2,000	T	S01, S02, T01, T04	
3	D	0	0	3	1,000	T	S01	
4	D	0	0	4	1,000	T	S01, S02, T01, T04	
5	D	0	0	5	1,000	T	S01, S02, T01, T04	
6	D	0	0	6	1,000	T	S01, S02, T01, T04	
7	D	0	0	7	1,000	T	S01, S02, T01, T04	
8	D	0	0	8	1,000	T	S01, S02, T01, T04	
9	D	0	0	9	1,000	T	S01, S02, T01, T04	
10	D	0	1	0	1,000	T	S01, S02, T01, T04	
11	D	0	1	1	1,000	T	S01, S02, T01, T04	
12	D	0	1	2	1,000	T	S01, S02, T01, T04	
13	D	0	1	3	1,000	T	S01, S02, T01, T04	
14	D	0	1	4	1,000	T	S01, S02, T01, T04	
15	D	0	1	5	1,000	T	S01, S02, T01, T04	
16	D	0	1	6	1,000	T	S01, S02, T01, T04	
17	D	0	1	7	1,000	T	S01, S02, T01, T04	
18	D	0	1	8	1,000	T	S01, S02, T01, T04	
19	D	0	1	9	1,000	T	S01, S02, T01, T04	
20	D	0	2	0	1,000	T	S01, S02, T01, T04	
21	D	0	2	1	1,000	T	S01, S02, T01, T04	
22	D	0	2	2	1,000	T	S01, S02, T01, T04	
23	D	0	2	3	1,000	T	S01, S02, T01, T04	
24	D	0	2	4	1,000	T	S01, S02, T01, T04	
25	D	0	2	5	1,000	T	S01, S02, T01, T04	
26	D	0	2	6	1,000	T	S01, S02, T01, T04	
27	D	0	2	7	1,000	T	S01, S02, T01, T04	
28	D	0	2	8	1,000	T	S01, S02, T01, T04	
29	D	0	2	9	1,000	T	S01, S02, T01, T04	
30	D	0	3	0	1,000	T	S01, S02, T01, T04	
31	D	0	3	1	1,000	T	S01, S02, T01, T04	
32	D	0	3	2	1,000	T	S01, S02, T01, T04	
33	D	0	3	3	1,000	T	S01, S02, T01, T04	
34	D	0	3	4	1,000	T	S01, S02, T01, T04	
35	D	0	3	5	1,000	T	S01, S02, T01, T04	
36	D	0	3	6	1,000	T	S01, S02, T01, T04	
37	D	0	3	7	1,000	T	S01, S02, T01, T04	
38	D	0	3	8	1,000	T	S01, S02, T01, T04	
39	D	0	3	9	1,000	T	S01, S02, T01, T04	
40	D	0	4	0	1,000	T	S01, S02, T01, T04	
41	D	0	4	1	1,000	T	S01, S02, T01, T04	

42	D	0	4	2	1,000	T	S01, S02, T01, T04	
43	D	0	4	3	1,000	T	S01, S02, T01, T04	
44	F	0	0	1	5,000	T	S01, S02, T01, T04	
45	F	0	0	2	5,000	T	S01, S02, T01, T04	
46	F	0	0	3	5,000	T	S01, S02, T01, T04	
47	F	0	0	4	5,000	T	S01, S02, T01, T04	
48	F	0	0	5	5,000	T	S01, S02, T01, T04	
49	F	0	0	6	1,000	T	S01, S02, T01, T04	
50	F	0	0	7	1,000	T	S01, S02, T01, T04	
51	F	0	0	8	1,000	T	S01, S02, T01, T04	
52	F	0	0	9	1,000	T	S01, S02, T01, T04	
53	F	0	1	0	1,000	T	S01, S02, T01, T04	
54	F	0	1	1	1,000	T	S01, S02, T01, T04	
55	F	0	1	2	1,000	T	S01, S02, T01, T04	
56	F	0	1	9	1,000	T	S01, S02, T01, T04	
57	F	0	2	0	1,000	T	S01, S02, T01, T04	
58	F	0	2	1	1,000	T	S01, S02, T01, T04	
59	F	0	2	2	1,000	T	S01, S02, T01, T04	
60	F	0	2	3	1,000	T	S01, S02, T01, T04	
61	F	0	2	4	1,000	T	S01, S02, T01, T04	
62	F	0	2	5	1,000	T	S01, S02, T01, T04	
63	F	0	2	6	1,000	T	S01, S02, T01, T04	
64	F	0	2	7	500	T	S01, S02, T01, T04	
65	F	0	2	8	500	T	S01, S02, T01, T04	
66	F	0	3	2	500	T	S01, S02, T01, T04	
67	F	0	3	4	500	T	S01, S02, T01, T04	
68	F	0	3	5	500	T	S01, S02, T01, T04	
69	F	0	3	7	500	T	S01, S02, T01, T04	
70	F	0	3	8	500	T	S01, S02, T01, T04	
71	F	0	3	9	500	T	S01, S02, T01, T04	
72	K	0	0	1	1,000	T	S01, S02, T01, T04	
73	K	0	0	2	1,000	T	S01, S02, T01, T04	
74	K	0	0	3	1,000	T	S01, S02, T01, T04	
75	K	0	0	4	1,000	T	S01, S02, T01, T04	
76	K	0	0	5	1,000	T	S01, S02, T01, T04	
77	K	0	0	6	1,000	T	S01, S02, T01, T04	
78	K	0	0	7	1,000	T	S01, S02, T01, T04	
79	K	0	0	8	1,000	T	S01, S02, T01, T04	
80	K	0	0	9	1,000	T	S01, S02, T01, T04	
81	K	0	1	0	1,000	T	S01, S02, T01, T04	
82	K	0	1	1	1,000	T	S01	
83	K	0	1	3	1,000	T	S01	
84	K	0	1	4	1,000	T	S01, S02, T01, T04	
85	K	0	1	5	1,000	T	S01, S02, T01, T04	
86	K	0	1	6	1,000	T	S01, S02, T01, T04	
87	K	0	1	7	1,000	T	S01, S02, T01, T04	

88	K	0	1	8	1,000	T	S01, S02, T01, T04	
89	K	0	1	9	1,000	T	S01, S02, T01, T04	
90	K	0	2	0	1,000	T	S01, S02, T01, T04	
91	K	0	2	1	1,000	T	S01, S02, T01, T04	
92	K	0	2	2	1,000	T	S01	
93	K	0	2	3	1,000	T	S01, S02, T01, T04	
94	K	0	2	4	1,000	T	S01, S02, T01, T04	
95	K	0	2	5	1,000	T	S01, S02, T01, T04	
96	K	0	2	6	1,000	T	S01, S02, T01, T04	
97	K	0	2	7	1,000	T	S01	
98	K	0	2	8	1,000	T	S01, S02, T01, T04	
99	K	0	2	9	1,000	T	S01, S02, T01, T04	
100	K	0	3	0	1,000	T	S01, S02, T01, T04	
101	K	0	3	1	1,000	T	S01	
102	K	0	3	2	1,000	T	S01, S02, T01, T04	
103	K	0	3	3	1,000	T	S01, S02, T01, T04	
104	K	0	3	4	1,000	T	S01	
105	K	0	3	5	1,000	T	S01, S02, T01, T04	
106	K	0	3	6	1,000	T	S01, S02, T01, T04	
107	K	0	3	7	1,000	T	S01, S02, T01, T04	
108	K	0	3	8	1,000	T	S01, S02, T01, T04	
109	K	0	3	9	1,000	T	S01, S02, T01, T04	
110	K	0	4	0	1,000	T	S01, S02, T01, T04	
111	K	0	4	1	1,000	T	S01, S02, T01, T04	
112	K	0	4	2	1,000	T	S01, S02, T01, T04	
113	K	0	4	3	1,000	T	S01, S02, T01, T04	
114	K	0	4	4	1,000	T	S01, S02, T01, T04	
115	K	0	4	5	1,000	T	S01	
116	K	0	4	6	1,000	T	S01, S02, T01, T04	
117	K	0	4	7	1,000	T	S01, S02, T01, T04	
118	K	0	4	8	1,000	T	S01, S02, T01, T04	
119	K	0	4	9	1,000	T	S01, S02, T01, T04	
120	K	0	5	0	1,000	T	S01, S02, T01, T04	
121	K	0	5	1	1,000	T	S01, S02, T01, T04	
122	K	0	5	2	1,000	T	S01, S02, T01, T04	
123	K	0	6	0	1,000	T	S01, S02, T01, T04	
124	K	0	6	1	1,000	T	S01, S02, T01, T04	
125	K	0	6	2	1,000	T	S01	
126	K	0	6	9	1,000	T	S01, S02, T01, T04	
127	K	0	7	1	1,000	T	S01, S02, T01, T04	
128	K	0	7	3	1,000	T	S01, S02, T01, T04	
129	K	0	8	3	1,000	T	S01, S02, T01, T04	
130	K	0	8	4	1,000	T	S01, S02, T01, T04	
131	K	0	8	5	1,000	T	S01, S02, T01, T04	
132	K	0	8	6	1,000	T	S01, S02, T01, T04	
133	K	0	8	7	1,000	T	S01, S02, T01, T04	

134	K	0	8	8	1,000	T	S01, S02, T01, T04
135	K	0	9	3	1,000	T	S01, S02, T01, T04
136	K	0	9	4	1,000	T	S01, S02, T01, T04
137	K	0	9	5	1,000	T	S01, S02, T01, T04
138	K	0	9	6	1,000	T	S01
139	K	0	9	7	1,000	T	S01
140	K	0	9	8	1,000	T	S01
141	K	0	9	9	1,000	T	S01
142	K	1	0	0	1,000	T	S01, S02, T01, T04
143	K	1	0	1	1,000	T	S01, S02, T01, T04
144	K	1	0	2	1,000	T	S01, S02, T01, T04
145	K	1	0	3	1,000	T	S01, S02, T01, T04
146	K	1	0	4	1,000	T	S01, S02, T01, T04
147	K	1	0	5	1,000	T	S01, S02, T01, T04
148	K	1	0	6	1,000	T	S01, S02, T01, T04
149	K	1	0	7	1,000	T	S01
150	K	1	0	8	1,000	T	S01, S02, T01, T04
151	K	1	0	9	1,000	T	S01, S02, T01, T04
152	K	1	1	0	1,000	T	S01, S02, T01, T04
153	K	1	1	1	1,000	T	S01, S02, T01, T04
154	K	1	1	2	1,000	T	S01, S02, T01, T04
155	K	1	1	3	1,000	T	S01, S02, T01, T04
156	K	1	1	4	1,000	T	S01, S02, T01, T04
157	K	1	1	5	1,000	T	S01, S02, T01, T04
158	K	1	1	6	1,000	T	S01, S02, T01, T04
159	K	1	1	7	1,000	T	S01
160	K	1	1	8	1,000	T	S01
161	K	1	2	3	1,000	T	S01, S02, T01, T04
162	K	1	2	4	1,000	T	S01
163	K	1	2	5	1,000	T	S01, S02, T01, T04
164	K	1	2	6	1,000	T	S01, S02, T01, T04
165	K	1	3	1	1,000	T	S01, S02, T01, T04
166	K	1	3	2	1,000	T	S01, S02, T01, T04
167	K	1	2	6	1,000	T	S01, S02, T01, T04
168	K	1	4	1	1,000	T	S01, S02, T01, T04
169	K	1	4	2	1,000	T	S01, S02, T01, T04
170	K	1	4	3	1,000	T	S01, S02, T01, T04
171	K	1	4	4	1,000	T	S01, S02, T01, T04
172	K	1	4	5	1,000	T	S01, S02, T01, T04
173	K	1	4	7	1,000	T	S01, S02, T01, T04
174	K	1	4	8	1,000	T	S01
175	K	1	4	9	1,000	T	S01, S02, T01, T04
176	K	1	5	0	1,000	T	S01, S02, T01, T04
177	K	1	5	1	1,000	T	S01, S02, T01, T04
178	K	1	5	6	1,000	T	S01, S02, T01, T04
179	K	1	5	7	1,000	T	S01, S02, T01, T04

180	K	1	5	8	1,000	T	S01, S02, T01, T04	
181	K	1	5	9	1,000	T	S01, S02, T01, T04	
182	K	1	6	1	1,000	T	S01, S02, T01, T04	
183	K	1	7	1	1,000	T	S01, S02, T01, T04	
184	K	1	7	2	1,000	T	S01, S02, T01, T04	
185	K	1	7	4	1,000	T	S01, S02, T01, T04	
186	K	1	7	5	1,000	T	S01, S02, T01, T04	
187	K	1	7	6	1,000	T	S01, S02, T01, T04	
188	K	1	7	7	1,000	T	S01, S02, T01, T04	
189	K	1	7	8	1,000	T	S01, S02, T01, T04	
190	K	1	8	1	1,000	T	S01, S02, T01, T04	
191	P	0	0	1	1,000	T	S01, S02, T01, T04	
192	P	0	0	2	1,000	T	S01, S02, T01, T04	
193	P	0	0	3	1,000	T	S01, S02, T01, T04	
194	P	0	0	4	1,000	T	S01, S02, T01, T04	
195	P	0	0	5	1,000	T	S01, S02, T01, T04	
196	P	0	0	6	1,000	T	S01	
197	P	0	0	7	1,000	T	S01, S02, T01, T04	
198	P	0	0	8	1,000	T	S01, S02, T01, T04	
199	P	0	0	9	1,000	T	S01, S02, T01, T04	
200	P	0	1	0	1,000	T	S01, S02, T01, T04	
201	P	0	1	1	1,000	T	S01, S02, T01, T04	
202	P	0	1	2	1,000	T	S01, S02, T01, T04	
203	P	0	1	3	1,000	T	S01, S02, T01, T04	
204	P	0	1	4	1,000	T	S01, S02, T01, T04	
205	P	0	1	5	1,000	T	S01, S02, T01, T04	
206	P	0	1	6	1,000	T	S01, S02, T01, T04	
207	P	0	1	7	1,000	T	S01, S02, T01, T04	
208	P	0	1	8	1,000	T	S01, S02, T01, T04	
209	P	0	2	0	1,000	T	S01, S02, T01, T04	
210	P	0	2	1	1,000	T	S01, S02, T01, T04	
211	P	0	2	2	1,000	T	S01, S02, T01, T04	
212	P	0	2	3	1,000	T	S01, S02, T01, T04	
213	P	0	2	4	1,000	T	S01, S02, T01, T04	
214	P	0	2	6	1,000	T	S01, S02, T01, T04	
215	P	0	2	7	1,000	T	S01, S02, T01, T04	
216	P	0	2	8	1,000	T	S01, S02, T01, T04	
217	P	0	2	9	1,000	T	S01, S02, T01, T04	
218	P	0	3	0	1,000	T	S01, S02, T01, T04	
219	P	0	3	1	1,000	T	S01, S02, T01, T04	
220	P	0	3	3	1,000	T	S01, S02, T01, T04	
221	P	0	3	4	1,000	T	S01, S02, T01, T04	
222	P	0	3	6	1,000	T	S01, S02, T01, T04	
223	P	0	3	7	1,000	T	S01, S02, T01, T04	
224	P	0	3	8	1,000	T	S01, S02, T01, T04	
225	P	0	3	9	1,000	T	S01, S02, T01, T04	

226	P	0	4	0	1,000	T	S01, S02, T01, T04	
227	P	0	4	1	1,000	T	S01, S02, T01, T04	
228	P	0	4	2	1,000	T	S01, S02, T01, T04	
229	P	0	4	3	1,000	T	S01, S02, T01, T04	
230	P	0	4	4	1,000	T	S01, S02, T01, T04	
231	P	0	4	5	1,000	T	S01, S02, T01, T04	
232	P	0	4	6	1,000	T	S01, S02, T01, T04	
233	P	0	4	7	1,000	T	S01, S02, T01, T04	
234	P	0	4	8	1,000	T	S01, S02, T01, T04	
235	P	0	4	9	1,000	T	S01, S02, T01, T04	
236	P	0	5	0	1,000	T	S01, S02, T01, T04	
237	P	0	5	1	1,000	T	S01, S02, T01, T04	
238	P	0	5	4	1,000	T	S01, S02, T01, T04	
239	P	0	5	6	1,000	T	S01, S02, T01, T04	
240	P	0	5	7	1,000	T	S01, S02, T01, T04	
241	P	0	5	8	1,000	T	S01, S02, T01, T04	
242	P	0	5	9	1,000	T	S01, S02, T01, T04	
243	P	0	6	0	1,000	T	S01, S02, T01, T04	
244	P	0	6	2	1,000	T	S01, S02, T01, T04	
245	P	0	6	3	1,000	T	S01, S02, T01, T04	
246	P	0	6	4	1,000	T	S01, S02, T01, T04	
247	P	0	6	5	1,000	T	S01, S02, T01, T04	
248	P	0	6	6	1,000	T	S01, S02, T01, T04	
249	P	0	6	7	1,000	T	S01, S02, T01, T04	
250	P	0	6	8	1,000	T	S01, S02, T01, T04	
251	P	0	6	9	1,000	T	S01, S02, T01, T04	
252	P	0	7	0	1,000	T	S01, S02, T01, T04	
253	P	0	7	1	1,000	T	S01, S02, T01, T04	
254	P	0	7	2	1,000	T	S01, S02, T01, T04	
255	P	0	7	3	1,000	T	S01, S02, T01, T04	
256	P	0	7	4	1,000	T	S01, S02, T01, T04	
257	P	0	7	5	1,000	T	S01, S02, T01, T04	
258	P	0	7	6	1,000	T	S01, S02, T01, T04	
259	P	0	7	7	1,000	T	S01, S02, T01, T04	
260	P	0	7	8	1,000	T	S01, S02, T01, T04	
261	P	0	8	1	1,000	T	S01, S02, T01, T04	
262	P	0	8	2	1,000	T	S01, S02, T01, T04	
263	P	0	8	4	1,000	T	S01, S02, T01, T04	
264	P	0	8	5	1,000	T	S01, S02, T01, T04	
265	P	0	8	6	1,000	T	S01, S02, T01, T04	
266	P	0	8	7	1,000	T	S01, S02, T01, T04	
267	P	0	8	8	1,000	T	S01, S02, T01, T04	
268	P	0	8	9	1,000	T	S01, S02, T01, T04	
269	P	0	9	2	1,000	T	S01, S02, T01, T04	
270	P	0	9	3	1,000	T	S01, S02, T01, T04	
271	P	0	9	4	1,000	T	S01, S02, T01, T04	

272	P	0	9	5	1,000	T	S01, S02, T01, T04	
273	P	0	9	6	1,000	T	S01, S02, T01, T04	
274	P	0	9	7	1,000	T	S01, S02, T01, T04	
275	P	0	9	8	1,000	T	S01, S02, T01, T04	
276	P	0	9	9	1,000	T	S01, S02, T01, T04	
277	P	1	0	1	1,000	T	S01, S02, T01, T04	
278	P	1	0	2	1,000	T	S01, S02, T01, T04	
279	P	1	0	3	1,000	T	S01, S02, T01, T04	
280	P	1	0	4	1,000	T	S01, S02, T01, T04	
281	P	1	0	5	1,000	T	S01, S02, T01, T04	
282	P	1	0	6	1,000	T	S01, S02, T01, T04	
283	P	1	0	8	1,000	T	S01, S02, T01, T04	
284	P	1	0	9	1,000	T	S01, S02, T01, T04	
285	P	1	1	0	1,000	T	S01, S02, T01, T04	
286	P	1	1	1	1,000	T	S01, S02, T01, T04	
287	P	1	1	2	1,000	T	S01, S02, T01, T04	
288	P	1	1	3	1,000	T	S01, S02, T01, T04	
289	P	1	1	4	1,000	T	S01, S02, T01, T04	
290	P	1	1	5	1,000	T	S01, S02, T01, T04	
291	P	1	1	6	1,000	T	S01, S02, T01, T04	
292	P	1	1	8	1,000	T	S01, S02, T01, T04	
293	P	1	1	9	1,000	T	S01, S02, T01, T04	
294	P	1	2	0	1,000	T	S01, S02, T01, T04	
295	P	1	2	1	1,000	T	S01, S02, T01, T04	
296	P	1	2	2	1,000	T	S01, S02, T01, T04	
297	P	1	2	3	1,000	T	S01, S02, T01, T04	
298	P	1	2	7	1,000	T	S01, S02, T01, T04	
299	P	1	2	8	1,000	T	S01, S02, T01, T04	
300	P	1	8	5	1,000	T	S01, S02, T01, T04	
301	P	1	8	8	1,000	T	S01, S02, T01, T04	
302	P	1	8	9	1,000	T	S01, S02, T01, T04	
303	P	1	9	0	1,000	T	S01, S02, T01, T04	
304	P	1	9	1	1,000	T	S01, S02, T01, T04	
305	P	1	9	2	1,000	T	S01, S02, T01, T04	
306	P	1	9	4	1,000	T	S01, S02, T01, T04	
307	P	1	9	6	1,000	T	S01, S02, T01, T04	
308	P	1	9	7	1,000	T	S01, S02, T01, T04	
309	P	1	9	8	1,000	T	S01, S02, T01, T04	
310	P	1	9	9	1,000	T	S01, S02, T01, T04	
311	P	2	0	1	1,000	T	S01, S02, T01, T04	
312	P	2	0	2	1,000	T	S01, S02, T01, T04	
313	P	2	0	3	1,000	T	S01, S02, T01, T04	
314	P	2	0	4	1,000	T	S01, S02, T01, T04	
315	P	2	0	5	1,000	T	S01, S02, T01, T04	
316	U	0	0	1	1,000	T	S01, S02, T01, T04	
317	U	0	0	2	1,000	T	S01, S02, T01, T04	

318	U	0	0	3	1,000	T	S01, S02, T01, T04	
319	U	0	0	4	1,000	T	S01, S02, T01, T04	
320	U	0	0	5	1,000	T	S01, S02, T01, T04	
321	U	0	0	6	1,000	T	S01, S02, T01, T04	
322	U	0	0	7	1,000	T	S01, S02, T01, T04	
323	U	0	0	8	1,000	T	S01, S02, T01, T04	
324	U	0	0	9	1,000	T	S01, S02, T01, T04	
325	U	0	1	0	1,000	T	S01, S02, T01, T04	
326	U	0	1	1	1,000	T	S01, S02, T01, T04	
327	U	0	1	2	1,000	T	S01, S02, T01, T04	
328	U	0	1	3	1,000	T	S01, S02, T01, T04	
329	U	0	1	4	1,000	T	S01, S02, T01, T04	
330	U	0	1	5	1,000	T	S01, S02, T01, T04	
331	U	0	1	6	1,000	T	S01, S02, T01, T04	
332	U	0	1	7	1,000	T	S01, S02, T01, T04	
333	U	0	1	8	1,000	T	S01, S02, T01, T04	
334	U	0	1	9	1,000	T	S01, S02, T01, T04	
335	U	0	2	0	1,000	T	S01, S02, T01, T04	
336	U	0	2	1	1,000	T	S01, S02, T01, T04	
337	U	0	2	2	1,000	T	S01, S02, T01, T04	
338	U	0	2	3	1,000	T	S01, S02, T01, T04	
339	U	0	2	4	1,000	T	S01, S02, T01, T04	
340	U	0	2	5	1,000	T	S01, S02, T01, T04	
341	U	0	2	6	1,000	T	S01, S02, T01, T04	
342	U	0	2	7	1,000	T	S01, S02, T01, T04	
343	U	0	2	8	1,000	T	S01, S02, T01, T04	
344	U	0	2	9	1,000	T	S01, S02, T01, T04	
345	U	0	3	0	1,000	T	S01, S02, T01, T04	
346	U	0	3	1	1,000	T	S01, S02, T01, T04	
347	U	0	3	2	1,000	T	S01, S02, T01, T04	
348	U	0	3	3	1,000	T	S01, S02, T01, T04	
349	U	0	3	4	1,000	T	S01, S02, T01, T04	
350	U	0	3	5	1,000	T	S01, S02, T01, T04	
351	U	0	3	6	1,000	T	S01, S02, T01, T04	
352	U	0	3	7	1,000	T	S01, S02, T01, T04	
353	U	0	3	8	1,000	T	S01, S02, T01, T04	
354	U	0	3	9	1,000	T	S01, S02, T01, T04	
355	U	0	4	1	1,000	T	S01, S02, T01, T04	
356	U	0	4	2	1,000	T	S01, S02, T01, T04	
357	U	0	4	3	1,000	T	S01, S02, T01, T04	
358	U	0	4	4	1,000	T	S01, S02, T01, T04	
359	U	0	4	5	1,000	T	S01, S02, T01, T04	
360	U	0	4	6	1,000	T	S01, S02, T01, T04	
361	U	0	4	7	1,000	T	S01, S02, T01, T04	
362	U	0	4	8	1,000	T	S01, S02, T01, T04	
363	U	0	4	9	1,000	T	S01, S02, T01, T04	

364	U	0	5	0	1,000	T	S01, S02, T01, T04
365	U	0	5	1	1,000	T	S01, S02, T01, T04
366	U	0	5	2	1,000	T	S01, S02, T01, T04
367	U	0	5	3	1,000	T	S01, S02, T01, T04
368	U	0	5	5	1,000	T	S01, S02, T01, T04
369	U	0	5	6	1,000	T	S01, S02, T01, T04
370	U	0	5	7	1,000	T	S01, S02, T01, T04
371	U	0	5	8	1,000	T	S01, S02, T01, T04
372	U	0	5	9	1,000	T	S01, S02, T01, T04
373	U	0	6	0	1,000	T	S01, S02, T01, T04
374	U	0	6	1	1,000	T	S01
375	U	0	6	2	1,000	T	S01, S02, T01, T04
376	U	0	6	3	1,000	T	S01, S02, T01, T04
377	U	0	6	4	1,000	T	S01, S02, T01, T04
378	U	0	6	6	1,000	T	S01, S02, T01, T04
379	U	0	6	7	1,000	T	S01, S02, T01, T04
380	U	0	6	8	1,000	T	S01, S02, T01, T04
381	U	0	6	9	1,000	T	S01, S02, T01, T04
382	U	0	7	0	1,000	T	S01, S02, T01, T04
383	U	0	7	1	1,000	T	S01, S02, T01, T04
384	U	0	7	2	1,000	T	S01, S02, T01, T04
385	U	0	7	3	1,000	T	S01, S02, T01, T04
386	U	0	7	4	1,000	T	S01, S02, T01, T04
387	U	0	7	5	1,000	T	S01, S02, T01, T04
388	U	0	7	6	1,000	T	S01, S02, T01, T04
389	U	0	7	7	1,000	T	S01, S02, T01, T04
390	U	0	7	8	1,000	T	S01, S02, T01, T04
391	U	0	7	9	1,000	T	S01, S02, T01, T04
392	U	0	8	0	1,000	T	S01, S02, T01, T04
393	U	0	8	1	1,000	T	S01, S02, T01, T04
394	U	0	8	2	1,000	T	S01, S02, T01, T04
395	U	0	8	3	1,000	T	S01, S02, T01, T04
396	U	0	8	4	1,000	T	S01, S02, T01, T04
397	U	0	8	5	1,000	T	S01, S02, T01, T04
398	U	0	8	6	1,000	T	S01, S02, T01, T04
399	U	0	8	7	1,000	T	S01, S02, T01, T04
400	U	0	8	8	1,000	T	S01, S02, T01, T04
401	U	0	8	9	1,000	T	S01, S02, T01, T04
402	U	0	9	0	1,000	T	S01, S02, T01, T04
403	U	0	9	1	1,000	T	S01, S02, T01, T04
404	U	0	9	2	1,000	T	S01, S02, T01, T04
405	U	0	9	3	1,000	T	S01, S02, T01, T04
406	U	0	9	4	1,000	T	S01, S02, T01, T04
407	U	0	9	5	1,000	T	S01, S02, T01, T04
408	U	0	9	6	1,000	T	S01, S02, T01, T04
409	U	0	9	7	1,000	T	S01, S02, T01, T04

410	U	0	9	8	1,000	T	S01, S02, T01, T04	
411	U	0	9	9	1,000	T	S01, S02, T01, T04	
412	U	1	0	1	1,000	T	S01, S02, T01, T04	
413	U	1	0	2	1,000	T	S01, S02, T01, T04	
414	U	1	0	3	1,000	T	S01, S02, T01, T04	
415	U	1	0	5	1,000	T	S01, S02, T01, T04	
416	U	1	0	6	1,000	T	S01, S02, T01, T04	
417	U	1	0	7	1,000	T	S01, S02, T01, T04	
418	U	1	0	8	1,000	T	S01, S02, T01, T04	
419	U	1	0	9	1,000	T	S01, S02, T01, T04	
420	U	1	1	0	1,000	T	S01, S02, T01, T04	
421	U	1	1	1	1,000	T	S01, S02, T01, T04	
422	U	1	1	2	1,000	T	S01, S02, T01, T04	
423	U	1	1	3	1,000	T	S01, S02, T01, T04	
424	U	1	1	4	1,000	T	S01, S02, T01, T04	
425	U	1	1	5	1,000	T	S01, S02, T01, T04	
426	U	1	1	6	1,000	T	S01, S02, T01, T04	
427	U	1	1	7	1,000	T	S01, S02, T01, T04	
428	U	1	1	8	1,000	T	S01, S02, T01, T04	
429	U	1	1	9	1,000	T	S01, S02, T01, T04	
430	U	1	2	0	1,000	T	S01, S02, T01, T04	
431	U	1	2	1	1,000	T	S01, S02, T01, T04	
432	U	1	2	2	1,000	T	S01, S02, T01, T04	
433	U	1	2	3	1,000	T	S01, S02, T01, T04	
434	U	1	2	4	1,000	T	S01, S02, T01, T04	
435	U	1	2	5	1,000	T	S01, S02, T01, T04	
436	U	1	2	6	1,000	T	S01, S02, T01, T04	
437	U	1	2	7	1,000	T	S01, S02, T01, T04	
438	U	1	2	8	1,000	T	S01, S02, T01, T04	
439	U	1	2	9	1,000	T	S01, S02, T01, T04	
440	U	1	3	0	1,000	T	S01, S02, T01, T04	
441	U	1	3	1	1,000	T	S01, S02, T01, T04	
442	U	1	3	2	1,000	T	S01, S02, T01, T04	
443	U	1	3	3	1,000	T	S01, S02, T01, T04	
444	U	1	3	4	1,000	T	S01, S02, T01, T04	
445	U	1	3	5	1,000	T	S01, S02, T01, T04	
446	U	1	3	6	1,000	T	S01, S02, T01, T04	
447	U	1	3	7	1,000	T	S01, S02, T01, T04	
448	U	1	3	8	1,000	T	S01, S02, T01, T04	
449	U	1	4	0	1,000	T	S01, S02, T01, T04	
450	U	1	4	1	1,000	T	S01, S02, T01, T04	
451	U	1	4	2	1,000	T	S01, S02, T01, T04	
452	U	1	4	3	1,000	T	S01, S02, T01, T04	
453	U	1	4	4	1,000	T	S01, S02, T01, T04	
454	U	1	4	5	1,000	T	S01, S02, T01, T04	
455	U	1	4	6	1,000	T	S01, S02, T01, T04	

456	U	1	4	7	1,000	T	S01, S02, T01, T04	
457	U	1	4	8	1,000	T	S01, S02, T01, T04	
458	U	1	4	9	1,000	T	S01, S02, T01, T04	
459	U	1	5	0	1,000	T	S01, S02, T01, T04	
460	U	1	5	1	1,000	T	S01, S02, T01, T04	
461	U	1	5	2	1,000	T	S01, S02, T01, T04	
462	U	1	5	3	1,000	T	S01, S02, T01, T04	
463	U	1	5	4	1,000	T	S01, S02, T01, T04	
464	U	1	5	5	1,000	T	S01, S02, T01, T04	
465	U	1	5	6	1,000	T	S01, S02, T01, T04	
466	U	1	5	7	1,000	T	S01, S02, T01, T04	
467	U	1	5	8	1,000	T	S01, S02, T01, T04	
468	U	1	5	9	1,000	T	S01, S02, T01, T04	
469	U	1	6	0	1,000	T	S01, S02, T01, T04	
470	U	1	6	1	1,000	T	S01, S02, T01, T04	
471	U	1	6	2	1,000	T	S01, S02, T01, T04	
472	U	1	6	3	1,000	T	S01, S02, T01, T04	
473	U	1	6	4	1,000	T	S01, S02, T01, T04	
474	U	1	6	5	1,000	T	S01, S02, T01, T04	
475	U	1	6	6	1,000	T	S01, S02, T01, T04	
476	U	1	6	7	1,000	T	S01, S02, T01, T04	
477	U	1	6	8	1,000	T	S01, S02, T01, T04	
478	U	1	6	9	1,000	T	S01, S02, T01, T04	
479	U	1	7	0	1,000	T	S01, S02, T01, T04	
480	U	1	7	1	1,000	T	S01, S02, T01, T04	
481	U	1	7	2	1,000	T	S01, S02, T01, T04	
482	U	1	7	3	1,000	T	S01, S02, T01, T04	
483	U	1	7	4	1,000	T	S01, S02, T01, T04	
484	U	1	7	6	1,000	T	S01, S02, T01, T04	
485	U	1	7	7	1,000	T	S01, S02, T01, T04	
486	U	1	7	8	1,000	T	S01, S02, T01, T04	
487	U	1	8	0	1,000	T	S01, S02, T01, T04	
488	U	1	8	1	1,000	T	S01, S02, T01, T04	
489	U	1	8	2	1,000	T	S01, S02, T01, T04	
490	U	1	8	3	1,000	T	S01, S02, T01, T04	
491	U	1	8	4	1,000	T	S01, S02, T01, T04	
492	U	1	8	5	1,000	T	S01, S02, T01, T04	
493	U	1	8	6	1,000	T	S01, S02, T01, T04	
494	U	1	8	7	1,000	T	S01, S02, T01, T04	
495	U	1	8	8	1,000	T	S01, S02, T01, T04	
496	U	1	8	9	1,000	T	S01, S02, T01, T04	
497	U	1	9	0	1,000	T	S01, S02, T01, T04	
498	U	1	9	1	1,000	T	S01, S02, T01, T04	
499	U	1	9	2	1,000	T	S01, S02, T01, T04	
500	U	1	9	3	1,000	T	S01, S02, T01, T04	
501	U	1	9	4	1,000	T	S01, S02, T01, T04	

502	U	1	9	6	1,000	T	S01, S02, T01, T04	
503	U	1	9	7	1,000	T	S01, S02, T01, T04	
504	U	2	0	0	1,000	T	S01, S02, T01, T04	
505	U	2	0	1	1,000	T	S01, S02, T01, T04	
506	U	2	0	2	1,000	T	S01, S02, T01, T04	
507	U	2	0	3	1,000	T	S01, S02, T01, T04	
508	U	2	0	4	1,000	T	S01, S02, T01, T04	
509	U	2	0	5	1,000	T	S01, S02, T01, T04	
510	U	2	0	6	1,000	T	S01, S02, T01, T04	
511	U	2	0	7	1,000	T	S01, S02, T01, T04	
512	U	2	0	8	1,000	T	S01, S02, T01, T04	
513	U	2	0	9	1,000	T	S01, S02, T01, T04	
514	U	2	1	0	1,000	T	S01, S02, T01, T04	
515	U	2	1	1	1,000	T	S01, S02, T01, T04	
516	U	2	1	3	1,000	T	S01, S02, T01, T04	
517	U	2	1	4	1,000	T	S01, S02, T01, T04	
518	U	2	1	5	1,000	T	S01, S02, T01, T04	
519	U	2	1	6	1,000	T	S01, S02, T01, T04	
520	U	2	1	7	1,000	T	S01, S02, T01, T04	
521	U	2	1	8	1,000	T	S01, S02, T01, T04	
522	U	2	1	9	1,000	T	S01, S02, T01, T04	
523	U	2	2	0	1,000	T	S01, S02, T01, T04	
524	U	2	2	1	1,000	T	S01, S02, T01, T04	
525	U	2	2	3	1,000	T	S01, S02, T01, T04	
526	U	2	2	5	1,000	T	S01, S02, T01, T04	
527	U	2	2	6	1,000	T	S01, S02, T01, T04	
528	U	2	2	7	1,000	T	S01, S02, T01, T04	
529	U	2	2	8	1,000	T	S01, S02, T01, T04	
530	U	2	3	4	1,000	T	S01, S02, T01, T04	
531	U	2	3	5	1,000	T	S01, S02, T01, T04	
532	U	2	3	6	1,000	T	S01, S02, T01, T04	
533	U	2	3	7	1,000	T	S01, S02, T01, T04	
534	U	2	3	8	1,000	T	S01, S02, T01, T04	
535	U	2	3	9	1,000	T	S01, S02, T01, T04	
536	U	2	4	0	1,000	T	S01, S02, T01, T04	
537	U	2	4	3	1,000	T	S01, S02, T01, T04	
538	U	2	4	4	1,000	T	S01, S02, T01, T04	
539	U	2	4	6	1,000	T	S01, S02, T01, T04	
540	U	2	4	7	1,000	T	S01, S02, T01, T04	
541	U	2	4	8	1,000	T	S01, S02, T01, T04	
542	U	2	4	9	1,000	T	S01, S02, T01, T04	
543	U	3	2	8	1,000	T	S01, S02, T01, T04	
544	U	3	5	3	1,000	T	S01, S02, T01, T04	
545	U	3	5	9	1,000	T	S01, S02, T01, T04	
546	U	3	6	4	1,000	T	S01, S02, T01, T04	
547	U	3	6	7	1,000	T	S01, S02, T01, T04	

548	U	3	7	2	1,000	T	S01, S02, T01, T04	
549	U	3	7	3	1,000	T	S01, S02, T01, T04	
550	U	3	8	7	1,000	T	S01, S02, T01, T04	
551	U	3	8	9	1,000	T	S01, S02, T01, T04	
552	U	3	9	4	1,000	T	S01, S02, T01, T04	
553	U	3	9	5	1,000	T	S01, S02, T01, T04	
554	U	4	0	4	1,000	T	S01, S02, T01, T04	
555	U	4	0	8	1,000	T	S01, S02, T01, T04	
556	U	4	0	9	1,000	T	S01, S02, T01, T04	
557	U	4	1	0	1,000	T	S01, S02, T01, T04	
558	U	4	1	1	1,000	T	S01, S02, T01, T04	

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1 General Facility Description

1.1 Clean Earth of Alabama, Inc. (CEA) is located at 402 Webster Chapel Road in Glencoe, Alabama. The facility receives hazardous wastes in bulk and containers by means of vans, tankers, roll offs and dumps. No hazardous waste is received by rail or water at the facility. No disposal of any type occurs on site.

1.1.1 The active portion of facility is on private property that consists of an area approximately 7 acres in size. The surrounding area consists of light industrial and residential housing within a 1000-foot area around the facility.

1.1.2 There are two water bodies located within 1000 feet of the facility; 1) Little Cove Creek 2) Quarry

1.1.3 Topography: See topographic map in Appendix A.

1.1.3.1 100-year Flood Plain: CEA is not in a 100-year flood plain. See Flood Plain Map in Appendix A.

1.2 Storm water, Runoff, and Sewage Control:

1.2.1 The facility operates under an NPDES storm water discharge permit. A Best Management Plan and Spill Prevention and Control Plan are maintained in accordance with this permit. All storm water that falls onto the facility is funneled to a storm water discharge point (**DSN001**) before being released. This discharge point is capable of holding approximately 10,000 gallons of storm water and is equipped with a valve that is capable of being opened and closed. This valve remains closed and is only opened to discharge storm water after the water to be discharged is inspected for obvious signs of oil sheen or other contamination. As part of the NPDES storm water permit, samples are collected semi-annually and sent off site to an independent lab for analysis. Storm water and ground water flows generally in a west/southwesterly direction. Sewage is handled by onsite septic tanks.

1.3 Access Control:

1.3.1 The facility is surrounded by a chain link fence with barbed wire. There are two gates that are used to control access to the facility. During normal working hours plant personnel and/or security personnel control access to the facility.

1.4 Traffic Patterns:

1.4.1 There is one major **road** (Webster Chapel) that allows access to the facility. Traffic patterns are rural in nature. Traffic on facility premises is accomplished by private roads leading to and from the main road. See the Facility Satellite photo in Appendix A.

2 Waste Analysis Plan

2.1 General Description of Waste

CEA processes industrial wastes including, but not limited to, paints, lacquers, thinners, waste petroleum products, petroleum by-products, aerosols, inks, resins, adhesives, petroleum distillates, solvents, such as, halogenated and non-halogenated, organic chemicals and by-products, various alcohols, waste contaminated materials and residues in its waste storage, blending and processing facility.

Waste materials may be delivered to the facility in bulk and/or various containers sizes, and either processed, blended and consolidated and/or stored in various containers sizes or tanks on-site or processed and shipped off-site to an approved, permitted disposal facility.

Most, but not all, of the wastes handled at the CEA facility are wastes designated as characteristic or listed as hazardous by U.S. EPA and the State of Alabama. However, CEA also receives used oil and other non-hazardous material.

2.2 Hazardous Characteristics

Hazardous wastes listed by the U.S. Environmental Protection Agency under its regulations at 40 CFR Part 261 (ADEM Rule 335-14-2) and wastes exhibiting hazardous characteristics also described in those regulations may be accepted at CEA depending upon their suitability for the facility's operations and compatibility with materials with which they will be stored, blended and/or processed. The wastes accepted at CEA are listed in the Part A Application and are identified by EPA Hazardous Waste Codes and associated hazard.

Wastes exhibiting the characteristics of reactivity, D003, may be accepted only for storage and shipped off-site to an approved, permitted facility for final disposal. EPA listed wastes which contain dioxins, furans, such as, F020-F023, F026- F027, are not accepted for processing or fuel blending purposes. However, these wastes may be accepted for storage and transfer from CEA to an approved, permitted disposal facility. *Note: that these wastes will not be placed in storage tanks.

2.3 Basis for Hazardous Designation

The typical components of hazardous waste accepted at CEA are spent solvents or other industrial wastes which are characteristic or listed wastes.

These wastes are further described by one or more toxicity characteristics. Many industrial wastes and waste petroleum products may contain significant heat value, i.e. BTU'S, but are not listed wastes for ignitability. Such wastes may contain sufficient concentrations of certain metals or organic components to exhibit the characteristics of toxicity. CEA may accept for storage, blending, Consolidated and processing any of these wastes. The determination of whether a waste is suitable for CEA's use is generally more dependent on the physical and chemical characteristics of the waste.

CEA also receives wastes in the form of debris, RCRA hazardous non-infectious medical wastes, metals bearing waste, plating waste, and solids for processing. Processing protocol for

these types of waste may consist of any of, or combination of, but not limited to, the following; storing, pumping, blending, bulking, consolidating, shredding, compaction, or separation. Once processed these wastes are then transferred off-site for final disposal to an approved, disposal facility.

CEA also receives wastes in the form of aerosol cans and other containers. Most of the aerosol containers to be received at the facility are regulated and classified as ignitable (or flammable) compressed gas as defined in 40 CFR Part 261.21 and 49 CFR 173.300. Non-flammable aerosol containers are also accepted at the facility (e.g., cans with compressed air, such as, nitrogen). Cylinders are also accepted at the facility, such as, but not limited to: oxygen, nitrogen, helium, propane, Freon, etc. and are transferred off-site for final disposal to an approved, permitted facility or recycled.

2.4 Laboratory Documentation

New waste streams undergo a prequalification review as indicated in Section 2.6.1. Analytical data, if required, may be provided by the generator or by CEA. Other laboratories may also be used as necessary. Samples of wastes delivered to the CEA facility are analyzed per Section 2.10, shipping papers and/or manifests are reviewed before acceptance into the facility. Any problems with waste identification and composition are resolved with the generator or the waste is not accepted into the facility. Samples for analysis from incoming shipments are generally performed at the laboratory on-site. Other laboratories may also be used as necessary.

2.5 Waste Analysis Plan

The waste analysis plan sets out the criteria, rationale and procedures that will be followed at CEA for the sampling, analysis and evaluation of wastes received, stored in tanks, consolidated, blended and/or processed at the facility. It outlines the procedures and analytical methods used to obtain the chemical and physical characteristics of the wastes to evaluate them for safe storage and handling by the facility.

2.6 Waste Qualification Protocol, Parameters and Rationale

It is CEA's policy not to process any waste until the analytical results are obtained and any discrepancies resolved, except for the following; aerosols, debris, Loose pack paint, Lab-packs or RCRA non-infectious medical waste.

2.6.1 Prequalification Procedures and Analysis

CEA requires a written waste profile of the waste material from the generator prior to the waste being shipped to the facility. An example of a Waste Profile Sheet, shown in Figure 1-1, is reviewed biennially or whenever the waste stream changes. The generator may use their version of a Waste Profile Sheet if all pertinent information is included on the form. The prequalification procedure is designed to assure that a comprehensive chemical profile is provided for each waste including, e.g., volatile and semi-volatile chemicals, metals, pesticides and poly-aromatic hydrocarbons. The information can be based on generator knowledge, generator certification, SDS or testing. Based on the information contained on the Profile Sheet, CEA will determine whether the waste can be managed on site.

Note: non-substantive changes to these exemplary documents may be made so long as all required information is contained in the documents.

As part of this prequalification procedure, representative samples of each waste stream are either obtained from the generator or from the first shipment of material at the facility. These are required to be analyzed and the results are compared to the waste profile.

The following prequalification fingerprint analysis will be performed as necessary.

1. BTU Value*
2. Chlorides*
3. pH**
4. Moisture Content***
5. Specific Gravity***
6. Compatibility*
7. Flash Point

* This analysis will be performed only on materials to be blended into fuel for reuse.

** This analysis will **not** be performed on solvent matrix materials, e.g., organic solvent waste or oil wastes, or water insoluble solid matrix wastes.

*** This analysis will be performed only on liquid materials.

2.7 Discrepancies

The criteria used for identifying discrepancies will include 1) differences in physical state 2) materials or compounds present which were not listed on the manifest or waste profile and 3) materials or compounds present but outside the expected range.

If discrepancies are noted, CEA will contact the generator and describe the discrepancy. The generator can revise the profile. If the profile is revised, the generator may fax or email the corrected signed document(s).

2.8 In-Coming Bulk Shipment Procedures and Analysis

In addition to the prequalification procedures, representative samples from the waste shipment are analyzed upon arrival at CEA and the results are compared to the waste profile. The following fingerprint analysis will be performed on incoming bulk shipments as discussed below:

1. BTU Value*
2. Chlorides*
3. pH**
4. Moisture Content***
5. Specific Gravity***
6. Compatibility*
7. GC Scan (PCB's)
8. Flash Point

* This analysis will be performed only on materials to be blended into fuel for reuse.

** This analysis will not be performed on solvent matrix materials, e.g., organic solvent wastes or oil wastes, or water insoluble solid matrix wastes.

*** This analysis will be performed only on liquid materials.

If discrepancies are noted CEA will contact the generator within 24 hours and describe the discrepancy. The generator is allowed 24 hours to 1) revise the profile; 2) correct the manifest; or 3) make arrangements to remove the waste. If revisions are necessary, the generator may fax or email the signed corrected document(s).

2.9 In-Coming Container Shipment Procedures and Analysis

In addition to the prequalification procedures, representative samples from incoming container shipments are analyzed upon arrival at CEA and the results are compared to the waste profile sheet. The following waste streams are exempt from sampling: aerosols, loose pack paint, Lab-packs, RCRA hazardous (non-infectious) medical waste (i.e. pharmaceuticals), cylinders, RCRA Reactive waste (D003), D.O.T. hazard classes 4.2 Spontaneously combustible and 4.3 Water Reactive, Poison Inhalation Hazards as defined by D.O.T. under hazard classes and divisions 2.3 & 6.1, Hydrofluoric acid at any other waste stream that management deem unsafe to sample.

The following prequalification fingerprint analysis will be performed as discussed below:

1. BTU Value*
2. Chlorides*
3. pH**
4. Moisture Content***
5. Specific Gravity***
6. Compatibility*
7. GC Scan (PCB's)
8. Flash point

* This analysis will be performed only on materials to be blended into fuel for reuse.

** This analysis will not be performed on solvent matrix material, e.g., organic solvent wastes or oil wastes, or water insoluble solid matrix wastes.

*** This analysis will be performed only on liquid materials.

Trucks carrying containers will proceed to the container unloading dock where plant personnel will visually inspect the load, confirm the number of containers, and, on the basis of the documentation and waste identification number, give permission for the load to be unloaded onto the container dock area. During the unloading process, all containers will be inspected, and any container not considered to be in a satisfactory condition will be placed safely in an over pack drum or other suitable container. Each consignment of containers will be kept separate until approved. When the truck is unloaded, and the manifest signed, the truck may leave the plant.

Containers being unloaded may be placed on sampling floor or the dock, or temporarily in storage, for sampling and verification by fingerprint testing. If it is found that the truckload or a group of containers within a truckload need to be placed in storage for a time before

processing, then these containers may be placed in the storage area for up to 72 hours prior to acceptance while undergoing fingerprint testing. Each container or group of containers, which have been sampled, will be specially marked in such a manner to indicate the arrival date and also so as to be readily apparent to plant personnel that the containers have not been sampled. For sampling, all containers in a shipment will be opened and sampled. A composite sample will be created from the individual samples in accordance with the written procedure. The samples will be taken to the laboratory for analysis.

The containers will travel by forklift truck to the appropriate storage area. If it is found that a container or group of containers does not conform to the profile sheet and upon review it is determined that the waste is unsuitable for processing, then the containers will be placed into storage and put on “hold” until a resolution has been reached.

If discrepancies are noted CEA will contact the generator within 24 hours and described the discrepancy. The generator is allowed 15 Days to 1) revise the profile; 2) correct the manifest; or 3) make arrangements to remove the waste. If revisions are necessary, the generator may fax the signed corrected document(s).

2.10 Parameters to be analyzed

A general discussion of the parameters to be analyzed follows:

pH

pH is a very important indicator since unwanted reactions may occur when wastes of widely different pHs are mixed.

Specific Gravity

Specific gravity is a basic indicator of waste characteristics and, as such, is used to ensure that a waste shipment matches the waste profile. Specific gravity is performed as both part of the pre-qualification and incoming shipment acceptance testing.

Flash Point

Flash point is an indicator for proper handling and storage of liquid wastes.

BTU/Chlorides/Moisture Content

These help determine the waste’s suitability as a fuel.

GC Scan (PCB’s)

The facility is not requesting a permit to process wastes whose PCB content is such that the waste is legally a PCB waste. Thus, it is important to sample and analyze for PCB content. However, these wastes may be accepted for temporary storage and transfer from CEA.

Compatibility

A compatibility test is conducted for all liquid and sludge waste received at the CEA facility for storage, blending, consolidating or processing. A sample from each load received is tested to determine if the material reacts with other materials already in the system.

For this test, a container is partially filled with a sample of representative material from a storage tank. A sample from the load being received is then added to the container and capped. The mixture is shaken and observed to determine if the samples react chemically.

Failure of the compatibility test does not necessary imply that the waste is out of specification. If a waste is found to be incompatible the decision will be made to either (1) reject the waste, (2) accept the waste and retest it using a different solvent matrix that will not result in a reaction that will interfere with processing or (3) ship it off-site to a permitted facility that could handle this material.

2.11 Test Methods

Table 1-1 lists the test methods utilized to measure each parameter at the CEA laboratory. Because of the varied nature of the waste materials it may be desirable or necessary to modify or adapt the standard methods or the sample preparation used prior to analysis, or to use entirely alternative methods. Such modifications are permissible under this plan, provided that the modified or alternative procedures produce accurate and reliable results. However, test methods normally conform to SW-846 methods or other acceptable methods.

Initial testing for qualifying a new waste stream is generally performed by CEA, independent laboratories may also be used. Analyses of samples collected from incoming trucks for acceptance at CEA are generally performed in laboratories at the facility. If the facility is unable to analyze a sample in a timely manner, an alternate laboratory will be utilized.

**TABLE 1-1
TEST METHODS FOR ANALYSIS ***

<u>Parameters</u>	<u>Test Methods</u>	<u>Reference</u>
Specific Gravity	Standard Hydrometer	
Flash Point	Closed-cup Methods	USEPA SW-846, Method 1010
pH	pH Measurement or Litmus Paper	USEPA SW-846, Method 9040, 9041, 9045
Heat of Combustion	Bomb Calorimeter	ASTM D-240
Moisture Content	Karl Fisher	ASTM D-2361, D-805, E-203
Chloride	Silver Nitrate Titration	ASTM D-808, and 512B

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Polychlorinated Biphenyls	Gas Chromatography	Test Method for Evaluating Solid Waste (EPA SW-846, Method 8082)
Toxicity Characteristic Leaching Procedure	Eight RCRA Hazardous Metals ONLY.	USEPA SW-846 1311

The above methods may be modified provided the modified method is sufficiently accurate and reliable for waste acceptance procedures.

2.12 Sampling Methods

2.12.1 Bulk Shipments

Sampling of tanker trucks is accomplished using a Coliwasa sampler. The sampling devices proposed for use by the facility for bulk shipments and containers go all the way to the bottom of the vessels so that accumulated sludge will be included in the sample matrix. Storage tanks may have agitators on them to reduce the possibility of sludge accumulation.

2.12.2 Containers

Samples from drums, e.g., 55-gallon drums and smaller containers are taken with a tube or pipe similar to a Coliwasa sampler. The pipe is made of non-sparking material such as copper or plastic and has an inside diameter of about ½” to 5/8”. This provides a much sturdier tool for sampling and has proven to be an adequate sampling device even under adverse sampling conditions.

2.12.3 Storage Tanks

Storage tanks may be sampled by different methods. A sampling device may be used for sampling tanks with depths of up to 30 feet or more. A Coliwasa sampler may be used if practical. Also, a grab sample may be taken from a recirculating line. Samples are typically collected from a tap located on the solvent tank recirculating line. The tank(s) are agitated, and solvents are recirculated for a period of approximately thirty minutes. A Coliwasa sampler may be used if practical. Also, a grab sample may be taken from a recirculating line, or an equivalent method.

2.12.4 Solids

Solids that are non-penetrable may be sampled with an auger, spatula or by chipping, scraping, or by tearing or breaking off a piece.

2.12.5 Aerosol Cans and Cylinders

Currently CEA receives shipments of aerosols in non-bulk (i.e. 55 gal. drum and smaller) and intermediate bulk containers (i.e. cubic yard boxes). Non-bulk containers of aerosols may be consolidated into cubic yard boxes prior to shipment off site for final disposal at an approved recycling facility. Again, no samples of the liquids or propellant gases from aerosol cans or cylinders will be obtained.

2.13 Frequency of Analysis

Sampling and testing prior to storage, blending, or processing. All new waste streams are prequalified. Waste streams in current use are reviewed biennially (24 months) at which time generators are required to provide a recertification of their waste profile.

Each incoming shipment of bulk waste is sampled to verify the identity of the waste. Containers are sampled according to ADEM Administrative Rule 335-14-5-.02 (c) and (d) in lots of 10 or less with the representative samples from each container being composited into 1 sample. Composite samples will be taken only from containers containing material from the same waste stream of the same generator.

2.14 Additional Waste Analysis Requirements Pertaining to Land Disposal Restrictions

The facility does not treat or dispose of any hazardous waste in land disposal units at the facility. Wastes are stored in tanks or containers, blended, consolidated or processed in tanks or containers for off-site shipment to approved, permitted facilities.

Waste generated at the facility requiring shipment off-site will require knowledge of the waste generating process or chemical analysis to allow the facility to make proper notification of any land disposal restrictions to the receiving facility. The applicable testing, tracking and recordkeeping requirements pertaining to the land disposal restrictions in 40 CFR 268.7 will be followed for applicable off-site shipments.

3 Preparedness, Prevention, and Contingency Plan

3.1 Emergency Contact Information

This section provides all emergency contact and response/reporting information for this facility.

TABLE 1 EMERGENCY COORDINATORS CONTACT INFORMATION		
Name/Position	Office Address	Phone Numbers
<i>Primary Emergency Coordinator</i> John Black General Manager	402 Webster Chapel Road Glencoe, AL 35905	713-538-4341 (C) 256-492-8340 (O)
<i>1st Alternate</i> Michael Wilson Plant Manager	402 Webster Chapel Road Glencoe, AL 35905	256-558-6185 (C) 256-492-8340 (O)
<i>2nd Alternate</i> Don Johnson Assistant Plant Manager	402 Webster Chapel Road Glencoe, AL 35905	256-613-6303 (C) 256-438-5376 (H) 256-492-8340 (O)
<i>3rd Alternate</i> Bryan Jones Area EH&S Manager	402 Webster Chapel Road Glencoe, AL 35905	205-405-3042 (C) 256-492-8340 (O)
See <u>SECTION 4</u> for description and requirements for emergency coordinators.		

TABLE 2 EMERGENCY NOTIFICATION PHONE LIST: COMMUNITY		
Entity	Name	Phone Numbers
Fire Department (Primary)	Glencoe Volunteer Fire Department	911 for Emergencies 1-256-492-1433
(Secondary) Fire Department	Gadsden Fire Department	911 for Emergencies 1-256-549-4500
Police	Glencoe Police Department	911 for Emergencies 1-256-492-4124
Hospitals	Gadsden Regional Medical Center Riverview Medical Center	1-256-494-4965 1-256-543-5838
EMS/Ambulance	Rural Metro Ambulance	911 1-256-442-3648
Response Contractor – for response to releases that occur during <i>or</i> after business hours	Safeway Environmental	1-256-492-3704
	Verisk (3E)	800-451-8346
Water	Glencoe Water Works	1-256-492-1020
Power – Electric	Alabama Power	1-888-430-5787
Natural Gas	ALAGASCO	1-800-292-4008

3.2 Other Numbers and Links for Reporting Oil Spills & Hazardous Substance Releases

1. National Response Center (NRC) - 1-800-424-8802
2. Alabama Dept. Of Public Safety (24 Hours) 1-334-261-4378
3. (LEPC) Local Emergency Planning Committee 256-549-4575
4. Alabama Emergency Response Commission 1-800-843-0699
5. EPA Region 4 in Atlanta Emergency Response | (404)-562-8700
6. United States Coast Guard – Mobile | (251) 441-5286
7. ADEM Montgomery Branch Field Office | (334)-260-2700
8. ADEM Birmingham Branch Field Office | (205)-942-6168
 - Aaron Peters, 1-334-394-4310 dapeters@adem.alabama.gov
9. ADEM - Central Office | (334)-271-7700
10. ADEM Office of Emergency Response (General Info. only) | (334)-260-2717
11. CHEMTREC 1-800-424-9300
12. Coastal Section Office | (251)-304-1176
13. Alabama State Warning Point - 1-800-843-0699

3.3 Purpose and Implementation

This Contingency Plan (the “Plan”) is designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the CEA, Glencoe, Alabama facility (the “Facility”). This Contingency Plan describes the actions Facility personnel will take to comply with Alabama Administrative Code Rule 335-14-5-.04(2) and (7) in response to fires, explosions, or any unpermitted sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the Facility. The provisions of this Plan will be carried out immediately whenever there is a fire, explosion or release of

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hazardous waste or hazardous waste constituents which could threaten human health or the environment.

The Plan also describes arrangements agreed to by local law enforcement, fire departments, hospitals, contractors and ADEM Field Operations Division and local emergency response teams to coordinate emergency services, pursuant to Alabama Administrative Code Rule 335-14-5-.03(8).

3.4 General Information

CEA operates a Facility located at 402 Webster Chapel Road in Etowah County, Glencoe, Alabama 35905 (the “Facility”) where hazardous wastes are stored in tanks and containers. The Facility is located on a total of 7.3 acres, with 4.6 acres being the actual area that contains the permitted Treatment, Storage and Disposal Facility (TSDF). The TSDF is secured with an 8-foot perimeter chain link fence and locking gates that are monitored. The fenced TSDF area includes the following buildings and structures:

1. An administrative and office building;
2. A breakroom building;
3. Building #1: drum storage building and covered containment pad/loading dock (a permitted area)
4. Building #2: (Quonset Hut) building (a permitted area);
5. Building #4: A solids waste processing building (a permitted area);
6. Building #3: a bulk storage covered containment area (a permitted area);
7. A covered aboveground storage tank (AST) farm and loading dock area (a permitted area); and
8. Miscellaneous hydraulic air compressor, fire suppression, electrical and safety supply sheds.

An earthen berm has been installed along the eastern and southern fence lines to aid with site drainage and runoff control. Just outside the permitted and fenced area to the south is a non-regulated carbon-black processing shed and pad.

The Facility accepts a variety of hazardous and non-hazardous industrial wastes, pharmaceutical wastes, universal wastes and e-wastes. The majority of wastes that are received at the Facility are blended into fuel and shipped off-site to be burned in kilns, boilers, and industrial furnaces. Other wastes are accepted for storage and shipment off-site to permitted facilities.

The Facility consists of storage and blending tanks, container storage and processing areas, tanker loading/unloading pad, solids processing area, and an on-site laboratory. The Facility has bulk storage capacity of 90,000 gallons divided amongst six (6)-15,000 gallon above ground storage tanks (ASTs) and 190,497 gallons in container storage such as various sized totes and drums, etc. Wastes are typically transported to the Facility in bulk tank trucks with a capacity of up to 6,000 gallons and vans carrying various size containers.

Incoming bulk fuel wastes are pumped directly into the ASTs. Containerized fuel wastes are processed through fuel blending or by other Facility processes such as bulking. Waste may be pumped to or from the holding tanks either directly from tankers or other containers as needed.

The Facility has the following active utilities:

- Natural Gas
- Electrical
- Water
- Internet/Cable
- Telephone

The only toilet facilities are in the administrative, laboratory breakroom buildings. These buildings are

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attached to a septic tank waste disposal system.

The Facility currently operates one (1) primary work shift between 7 AM to 3:30 PM. A second work shift operates between 2:30 PM to 11:00 PM. The site always has one security guard on the premises 24/7, 365 days a year.

3.5 Emergency Coordinators

At all times, there must be at least one employee either on the Facility premises or on call (i.e., available to respond to an emergency by reaching the Facility within a short period of time) with the responsibility for coordinating all emergency response measures. That person is known as the Emergency Coordinator.

The Emergency Coordinator must be available on a 24-hour basis and trained in the responsibilities of the position. The Emergency Coordinator will be thoroughly familiar with all aspects of the Facility's Contingency Plan, all operations and activities at the Facility, the location and characteristics of wastes handled, the location of all records within the Facility and the Facility layout. In addition, the Emergency Coordinator and alternates have the authority to commit the resources needed to carry out the Contingency Plan.

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Emergency Equipment

The following emergency response equipment is available at the Facility:

INVENTORY OF EMERGENCY RESPONSE EQUIPMENT

① Throughout Facility	⑦ Drum Storage Building
② Office Building	⑧ Stabilization Building
③ Break Room Building	⑨ Bulk Storage
④ Emergency Storage Shed	⑩ Solids Buildings
⑤ Laboratory Building	⑪ Nonregulated Operations Pad
⑥ AST Tank Farm	⑫ Other:

CATEGORY/ITEM	LOCATION(S) (Insert #'S from above to all that apply)	CAPABILITY/USE
COMMUNICATIONS		
Telephones	1	Land line service. For use in contacting emergency responders and employees.
Portable Radios	1	Used for onsite inter-communication between staff. Hand held and body mounted.
Air Horns	1	Used to alert employees of an emergency or evacuation order.
PERSONAL PROTECTIVE EQUIPMENT		
Air-Purifying Respirators	4	Variety of forms, see corporate respiratory protection program for selection criteria.
Full-face (APR) Respirators	Individually Issued	Individual issued to employees. Air purifying. Adequate reserves on hand. Variety of forms, see corporate respiratory protection program for selection criteria.
Half-face (APR) Respirators	Individually Issued	Individual issued to employees. Air purifying. Adequate reserves on hand. Variety of forms, see corporate respiratory protection program for selection criteria.
Respirator Cartridges:		
Multi-gas Organic Vapor Acid Gas/P100	Individually Issued (Stored PPE Closet Electrical Room)	Protects against organic vapors - see corporate respiratory protection program for selection details.
Other:		
Other:		
Particulate Protective Suits	4	Protects against small size hazardous particles, such as dust, lead, asbestos, and mold.
Chemical Resistant Suits	4	Protects against splash hazard from certain hazardous chemical types. Need to check compatibility of suit with waste.
Rain Gear	4	Protects against splash hazard from certain hazardous chemical types. Need to check compatibility of suit with waste.
Booties	4	Protects against splash hazard from certain hazardous chemical types. Need to check compatibility of suit with waste.
Splash Shield	4	Protects face from splashes.
Goggles	4	Protects eyes.
Safety Glasses	4	Protects eyes.
Hearing Protection	4	Protects ears/hearing.
Chemical Resistant Gloves:	4	
Nitrile	4 work station area PPE supply room	Protect when working with oils, greases, acids, caustics and alcohols. Not recommended for oxidizing agents, aromatic solvents, ketones and acetates.
PVC	4	Versatile heavy duty work glove that protects workers from chemicals, punctures, cuts and abrasion.
Cloth Glove Liners	4	Inner cloth glove liners.
Decontamination Supplies	4	Wash brushes, alquinox, alcohol, buckets to clean off emergency personnel.
Duct Tape	1, 4	Seal PPE, multi-purpose.
EMERGENCY RESPONSE EQUIPMENT		
Backhoe	12 Other: Various Locations Onsite	Mechanical tool for excavating and recovering large quantities of released waste.
Hand shovels, rakes, hoes, & brooms	4, 12 Other: Various Locations Onsite	Hand tools for waste capture.
Explosion Proof Pumps	6, 12 Other: Various Locations Onsite	Pumps that are compliant with NFPA standards for transferring or pumping Class 1 and 2 flammable liquids.

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INVENTORY OF EMERGENCY RESPONSE EQUIPMENT

① Throughout Facility	⑦ Drum Storage Building
② Office Building	⑧ Stabilization Building
③ Break Room Building	⑨ Bulk Storage
④ Emergency Storage Shed	⑩ Solids Buildings
⑤ Laboratory Building	⑪ Nonregulated Operations Pad
⑥ AST Tank Farm	⑫ Other:

CATEGORY/ITEM	LOCATION(S) (Insert #'S from above to all that apply)	CAPABILITY/USE
Pneumatic Pumps	6, 12 Other: Various Locations Onsite	Pneumatic diaphragm pump. Can be used for non-flammable and flammable liquids. Check compatibility of pump and bladder to waste and degree of flammability of material.
Sump/Electric Pump	12 Other: (TBD)	Pump non-flammable liquids.
Centrifugal Pump	4	Typically gas powered pumps designed to move large volumes of non-flammable liquids.
Hoses	6, 12 Other: Various Locations Onsite	Attachments to pumps.
Clamps & Fittings	12 Other: Various Locations Onsite	Misc. fittings for piping and hoses
Compressor	8, 12 Other: Various Locations Onsite	Air Supply for pneumatic equipment
Generator/Extension Cords	12 Other: Various Locations Onsite	In-field electrical power supply.
Forklift	12 Other: Various Locations Onsite	Removing pallets, drums and other objects.
Absorbent Materials:		
Pads	4	Spill containment/clean-up.
Booms	4	Spill containment/clean-up.
Particulate	4	Spill containment/clean-up.
Wipes	4	Spill containment/clean-up.
Soda Ash	8	Spill containment/clean-up.
Saw Dust	4, 7, 8, 9, 10, 11	Spill containment/clean-up.
Drums	12 Other: Various Locations Onsite	Waste capture/storage.
Totes	12 Other: Various Locations Onsite	Waste capture/storage.
Buckets	12 Other: Various Locations Onsite	Waste capture/storage.
Pre-assembled Spill Response Kits	4, 7, 8, 9, 10, 11	Chemical resistance gloves (2 pair), goggles (2), Tyvek coveralls (2), oil absorb granules, absorbent pads (25), absorbent socks (4), absorbent pillows (2), disposable bags and ties (3), roll of caution tape, plastic shovel, 85 gallon container. Kit is capable of containing spills up to 26.5 gallons. Materials contained in spill kit can be used to contain spill, to prevent it from reaching a waterway or from leaving the site.
Storm Drain Covers	4	Cover drains to prevent impacted surface water from migrating within the stormwater system.
Polyethylene Sheeting (rolls)	1	Building containments, covering wastes, protective layer, etc.
FIRE FIGHTING SUPPLIES		
Foam Station (fixed)	12 Other: 2 Central Locations Onsite	Firefighting - Class B foams for flammable or combustible liquids.
ABC Fire Extinguisher (portable)	1	Firefighting - Class A (combustible), Class B (flammable or combustible liquids) and Class C (electrical) fires.
Dolly Mounted ABC Fire Ext. w/ Hose	8	Firefighting - Class A (combustible), Class B (flammable or combustible liquids) and Class C (electrical) fires.
Class D Fire Extinguisher	8, 10	Extinguishing Class D (combustible metal) fires.
FIRST AID SUPPLIES		
First Aid Kit	1	Equipment for treating minor medical problems such as lacerations, punctures, abrasions, sprains, strains, 1 st and 2 nd degree burns.
Automatic Defibrillator	5	Treating sudden cardiac arrest.
Stretcher	12 Other: (TBD)	Transport injured person.
Eye Wash Station	4, 7, 8, 9, 10, 11	Wash eyes after being splashed.
Showers	4, 7, 8, 9, 10, 11	Wash body after being splashed.
NA = Not applicable or currently onsite. TBD = To Be Determined/Unknown whether onsite at this time.		

3.6 Evacuation Plan

In the event that the Emergency Coordinator or Alternate determines that the evacuation of Facility personnel is necessary, the need for evacuation will be signaled through the use of an emergency air horn. All employees, contractors and visitors will evacuate the Facility using predetermined routes as depicted on DRAWING 2 and proceed to the Assembly (Rally) Point. At the Assembly Point, supervisors will note the presence of their employees and any contractors who were working in their area. The Emergency Coordinator

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or Alternate (or designee) will account for any visitors who were present at the Facility.

General evacuation recommendations and procedures are also listed on DRAWING 2, but for a full account of CEA’s evacuation procedures and routes please consult the personnel training manual. Evacuation routes are also posted throughout the Facility.

3.7 Copies of the Contingency Plan

A copy of the Contingency Plan and all revisions to the plan will be maintained at the Facility and submitted to local law enforcement, fire departments, hospitals, and the Alabama Department of Environmental Management (ADEM), Field Operations Division as well as any local emergency response teams that may be called upon to provide emergency services. Documentation of compliance with this requirement will be maintained at the Facility.

3.8 Amendment of the Contingency Plan

The Contingency Plan will be reviewed, and immediately amended if necessary, whenever

- The Facility’s permit is revised;
- The Plan fails in an emergency;
- The Facility changes, in its design, construction, operation, maintenance, or other circumstances, in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- The list of emergency coordinators changes; or
- The list or location of emergency equipment changes.

All revisions to the plan will be provided to ADEM and/or all other parties that are typically provided copies of the plan.

3.9 Emergency Procedures

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator or Alternate will immediately activate internal Facility alarms or communication systems, where applicable, to notify all Facility personnel. Emergency notification systems include two-way radios, voice, or air horn. In addition, the Emergency Coordinator will notify appropriate State of Alabama or local agencies with designated response roles if their help is needed.


The Facility uses a color-coded system, as shown below, to identify the type of emergency:

EMERGENCY RESPONSE CODES

 YELLOW (INJURY)

 BLUE (SPILL)

 RED (FIRE)

 **YELLOW (INJURY)** is used to denote when an injury has occurred onsite. There are two types of injuries: (1) a minor injury where the injured party(s) can be adequately addressed by onsite personnel using the Facility’s first aid supplies; and (2) a serious injury where the injured party(s) requires immediate professional medical attention either onsite and/or requires transport to an offsite medical facility for care. **IN ALL CASES, BEFORE A RESPONDER(S) ATTEMPTS TO PROVIDE AID TO AN INJURED PARTY THEY MUST SURVEY THE SCENE TO MAKE SURE IT IS SAFE FOR THEM TO PROVIDE ASSISTANCE. RESPONDING TO AN INJURY, REGARDLESS OF THE DEGREE OR URGENCY,**

MUST ONLY BE DONE WHEN THE AID PROVIDER(S) CAN DO SO SAFELY.

BLUE (SPILL) is used to denote a spill of a hazardous material. There are two types of spills: (1) a minor and/or contained spill that occurs within a structure that can control and prevent any of the materials from migrating to other areas and/or impacting the environment; and (2) is an uncontained spill where materials can migrate in an uncontrolled manner and potentially impact the environment. Uncontained spills are dynamic and pose unique risks and concerns and must be addressed based on real-time situations and site conditions. When liquids are released to an uncontained area the liquid will flow in a downgradient direction. Predicting where the material may migrate based on its viscosity and site terrain so that barriers or temporary containments can be made to capture the migrating liquid is recommended. Preferably, response actions should attempt to keep the material onsite, if possible. Amongst many options, the use of absorbent materials (booms, pads, wipes, etc.), creating ditches and pits (lined if possible) or diverting the materials into an existing containment structure are some of the things that might be consider to address and shorten the migration route of an uncontained spill. Ultimately, the goal of the responder should be to stop the migration of the material as quickly as possible in a manner that allows for the largest volume of material to be subsequently recovered. Special attention should be paid to minimizing the risk the spill may pose to human health and environment as well as ensuring that the material does not pose a physical hazard to the site structures or other areas.

RED (FIRE) is used to denote a fire or explosion. There are two types of fires/explosions: (1) an incipient fire that is small or in the initial stages of starting (or small chemical reaction/explosion) that can be put out by appropriately trained Facility personnel using the onsite fire extinguishing resources; and (2) a serious fire/explosion that will or already has exceeded the firefighting/response capabilities available onsite. A serious fire or explosion of this nature requires immediate outside professional firefighting resources and will likely require the evacuation of the Facility. A generalized response flow diagram for each of these emergencies is provided in APPENDIX A.

Whenever there is a spill/release, fire, or explosion, the Emergency Coordinator or Alternate will immediately identify the character, exact source, amount, and areal extent of any released materials or hazardous substances. This may be done by observation or review of Facility records or manifests, and, if necessary, by chemical analysis.

Concurrently, the Emergency Coordinator or Alternate will assess possible hazards (substances or conditions present) to human health or the environment that may result from the release, fire, or explosion. That assessment will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions). Such information will be provided to the appropriate Federal, State and local authorities as necessary to protect human health and the environment.

The following sections describe the prioritized response actions to be carried out by Facility personnel under this response plan to ensure the safety of the Facility and its employees and to mitigate or prevent small, medium and worst-case discharges.

3.9.1 Discovery

If an employee discovers a spill, fire, or other emergency, he or she will notify the Emergency Coordinator or Alternate by telephone, portable radio or other direct means and report the following:

1. Nature of emergency (i.e. fire or spill);
2. Location of emergency;
3. Size and extent of emergency;
4. Materials involved;

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5. Injury to personnel;
6. The name of the person providing notice of the emergency; and,
7. The person's present location.

Telephones are located at clearly visible locations within the administrative office and operational buildings only. Notification can be made via phones as needed.

The Emergency Coordinator or Alternate will determine the proper response in accordance with the control procedures provided in this Contingency Plan.

3.9.2 Initial Response

In the event of injury, in-house, trained personnel will administer first aid as necessary. If the injury is beyond the capabilities of first aiders, the Emergency Coordinator or Alternate (or designee) will contact the ambulance (911) and the hospital, as appropriate. In the event of an after hour's emergency, the onsite supervisor will be responsible for contacting the ambulance and hospital in the event of injuries.

Upon being notified of the emergency, the Emergency Coordinator or Alternate (or designee) will assess the situation to determine the following:

1. Hazards involved including the character, exact source, amount, and areal extent of any released materials or hazardous substances;
2. Magnitude of the problem;
3. 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;
4. Resources threatened; and,
5. Exclusion zone need or if evacuation of the Facility is required.

The Emergency Coordinator will then determine the actions to be taken using the procedural flow diagrams provided in APPENDIX A.

If the emergency involves the release of a hazardous material, while awaiting arrival of the Emergency Coordinator or his designee, plant personnel shall commence containment activities immediately, using all available trained manpower and materials on-hand. **All containment activities will be conducted at a safe distance from the release area and will consist of only those activities for which the employee has received training and can be safely administered.** Immediate containment of the spill shall include blocking of adjacent drains, constructing dikes, etc., using all available containment materials on-hand. The location of available emergency equipment is provided in SECTION 5 of this Contingency Plan.

If the emergency involves an incipient (i.e., just starting/small) fire, and the employee can safely do so while allowing a safe means of egress from the building, the employee may fight the fire using the appropriate handheld fire extinguisher. **All firefighting activities will be limited to incipient fires and will consist of only those activities for which the employee has received training and can be safely administered.** The location of available emergency equipment is provided in SECTION 5 of this Contingency Plan as well as on DRAWING 1.

CEA employees will not engage in emergency response operations other than responding to minor releases or hazardous materials, containment of larger releases of hazardous materials or responding to incipient fires. In the event of an emergency, as described in this Plan, all employees will evacuate the plant buildings and report to a designated assembly area or shelter-in-place as directed by the Emergency Coordinator. An outside emergency responder (i.e., Fire Department, a contract response company) will

be contacted for emergency response.

3.10 Establishment of Objectives and Priorities for Response

3.10.1 Immediate Goals

In the event of an accidental discharge or spill of hazardous materials, the immediate objective is to protect human health and the environment by:

1. Containing the spill to the smallest possible area;
2. Preventing potential ignition of the released material; and,
3. Recovering and packaging the spilled materials.

3.10.2 Later Goals

After the accident or emergency has been address, the later goals of the response are:

1. Investigate the nature and extent of impact resulting from the incident and complete the cleanup or remediation of affected areas (coordinate with local, state and federal agencies, as needed);
2. Diagnose the cause;
3. Evaluate the adequacy of the response, safety equipment, staff preparedness and training, and the ability of the site's engineered controls to address/manage the type of emergency that just occurred.
4. Evaluate pros and cons of the Facility's response actions (i.e., lessons learned); and,
5. Revisit the Contingency Plan and make modifications as needed.

3.11 Mitigation Actions for Releases

3.11.1 Immediate Emergency Actions for Releases

Emergency procedures are the responsibility of the Emergency Coordinator or Alternate (or designee) and not the general employees of CEA. Immediate procedures are outlined below:

1. The Emergency Coordinator or Alternate (or designee) will identify the character, exact source, amount and extent of any released materials and assess possible hazards to human health or the environment.
2. If necessary, the Emergency Coordinator or Alternate (or designee) will order the evacuation of all personnel within the Facility using predetermined routes as shown on DRAWING 2. As an alternative, the Emergency Coordinator or designee can order personnel to shelter-in-place.
3. If the Emergency Coordinator or designee determines there is a threat to human health or to the environment outside the Facility he will report his findings immediately to local authorities, especially if evacuation of local areas is advised (see procedural flow diagrams) by calling 911.

3.11.2 Response to Small Spills or Leaks

For all spills or leaks, the following guidelines will be followed as closely as possible by individuals specified only by the Emergency Coordinator or his/her alternate. If the spill is small enough to be absorbed, neutralized or otherwise controlled (i.e., typically 55-gallons or less) at the time of release by employees in the immediate release area; does not pose an adverse exposure hazard to employees; and is within the scope of the employee's training then the spill will be handled in the following manner:

1. Make sure all unnecessary persons are removed from the hazard area.
2. Survey the area. Identify the source and nature of the spill to determine if the area is safe and how best respond to the spill.
3. If flammable material is involved, remove all ignition sources, and use spark and explosion proof equipment and clothing in containment and clean up.

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4. If possible, try to stop the leak.
5. Remove all surrounding materials that could be especially reactive with the materials in the waste. Determine the major components at the time of the spill.
6. Specific spill clean-up methods are provided in APPENDIX B to this Contingency Plan.
7. Use absorbent pads, booms, earth, sandbags, sand, and other inert materials to contain, divert, neutralize and clean up a spill if it has not been contained by a dike or sump. Most spills contained within a dike or sump can be pumped back into the appropriate storage tank or drum. If the released material is flammable, make sure that all electrical/mechanical equipment used in the response is explosion proof.
8. Procedure to follow for leaking drum:
 - a. Move drum into or construct containment around area;
 - b. Roll drum or stand up on end away from leak;
 - c. Drain contents (transfer to clean drum);
 - d. Label both drums accordingly;
 - e. Absorb spillage or leakage with absorbent;
 - f. Transfer absorbent waste to drum, label accordingly; and
 - g. Store until final disposal.
9. If spilled materials are flowing off site, try to stop flow from the source by using sand, earth, sandbags, etc. If this is done, pump this material out into a temporary holding tank or drum as soon as possible. If the released material is flammable, make sure that all electrical/mechanical equipment used in the response is explosion proof.
10. Place all containment and clean-up materials in drums for proper disposal. Some items, such as absorbent rags or booms, may have to be cut up.
11. Place all recovered liquid wastes in drums for removal to an approved disposal site.

3.11.3 Response to Large Spills

For large spills (i.e., greater than 55-gallons) and/or small spills of an acutely hazardous material, the Emergency Coordinator or Alternate (or designee) will use the following procedure:

1. Call Glencoe Volunteer Fire Department if a fire is involved by dialing 911.
2. With the exception of small fires in the incipient stage, Facility employees are not to respond to a fire. Any response must be consistent with the employee's training and experience.
3. If exposed containers can safely be cooled with water spray and/or removed from the area, the Emergency Coordinator or Alternate may direct employees to do so. Note that fire emergencies generally supersede spill emergencies.

IF A HISSING SOUND COMES FROM A VENTING DEVICE OR IF A DRUM BEGINS TO BULGE OR DISCOLOR, WITHDRAW FROM THE AREA IMMEDIATELY.

4. If the spill can be safely contained through the use of absorbents, spill booms, storm drain covers or other appropriate spill equipment, the Emergency Coordinator or designee may direct properly trained employees to do so.
5. Contact an emergency response contractor listed in SECTION 1 for emergency spill response.
6. Contact the proper authorities (see SECTION 1) to report the spill or release as deemed necessary by the Emergency Coordinator or designee. Contact local authorities first so that, if necessary, downstream water users and/or persons downwind of the vapor can be notified and, if necessary, evacuated and/or sheltered. The Emergency Coordinator or Alternate (or designee) will be prepared to assist authorities in making the final determination relative to evacuation. However, the final decision to

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evacuate the area will be the responsibility of the local agencies.

7. All emergency equipment used in the emergency will be returned to ready status prior to resumption of plant operations in the affected area. During the emergency, the Emergency Coordinator or designee should be aware of the following:
 - a. If the Facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator or designee must monitor for leaks, pressure build up, gas generation, or ruptures in valves, pipes or other equipment, as appropriate.
 - b. No waste or other materials that may be incompatible with the released material should be treated, stored, or disposed in the affected areas of the Facility until after cleanup procedures are completed
 - c. Run-off (i.e., liquid wastes and/or fire water potentially mixed with wastes) from spills or firefighting operations, to the degree possible, should be contained in a safe, down gradient location, onsite and then recovered in competent vessels pending proper profiling and re-processing or disposal.

The Emergency Coordinator or designee will document the incident within 15 days and begin an investigation of the incident and the effectiveness of the emergency procedures.

3.12 Mitigation Actions for Fires

3.12.1 Precautionary Measures for Fires

In general, a fire can be extinguished by eliminating one of the four (4) basic components that keep it in the active state. They are:

Oxygen supply - Usually, oxygen is supplied by air.

Heat - BTUs are generated on a self-sustaining basis as a result of continuing oxidation.

Fuel - The material undergoing oxidation.

Chemical Reaction. The following precautionary measures are in place to minimize the spread of fire:

- Portable A, B, C fire extinguishers (see top insert) are located throughout the facility for use on trash, wood, building materials, flammable liquids and electrical fires are located throughout the Facility and are designated with identifying labels (see DRAWING 1). In addition to the fixed locations within the structures, forklifts and other onsite equipment are also equipped with fire extinguishers.
- Portable D (dry powder) fire extinguishers (see middle insert) are located in Building #2 (s) and Building #4 for use on combustible metals fires (see DRAWING 1).
- Two (2) fixed foam fire suppression stations (see bottom insert), #1 is west of the main administration building and #2 is in the middle of the Facility between the Building #1 and Building #4 (as shown in the photograph below), are for use on flammable liquids (see DRAWING 1).
- Plant personnel are trained annually on how to properly use fire extinguishers. All employees are trained in proper reporting and evacuation procedures.



TYPICAL DOLLY MOUNTED CLASS ABC HOSE UNIT AND CLASS D (DRY POWDER) EXTINGUISHER AT FACILITY



TYPICAL FIXED FOAM SUPPRESSION SYSTEM SHED AT FACILITY (FOAM STATION #2 – SMALL SHED ON THE LEFT)

3.13.2 Response to Fires and Explosions

1. The person discovering a fire will leave the immediate area and notify the Emergency Coordinator or Alternate by telephone or portable radio and provide the following information:
 - a. Nature of the emergency;
 - b. Location of the emergency;
 - c. Size and extent of the emergency;
 - d. Hazardous materials involved (if any);
 - e. Person(s) injured and seriousness of injury;
 - f. The name of the person providing notice of the emergency; and,
 - g. The person's present location.

Note: The first priority for an employee discovering a fire should be notifying the Emergency Coordinator or Alternate Coordinator by telephone, portable radio or other direct means so that the chain of command is aware of the situation and the fire department can be contacted, if needed.

2. If the fire is small and contained (incipient) and does not involve hazardous materials:
 - a. The Glencoe Voluntary Fire Department will be notified. Under extreme conditions, the Gadsden Fire Department can also be notified as a secondary or back-up option.
 - b. At the same time, any employee with fire extinguisher training may extinguish the fire, if within his training and experience.
 - c. If exposed containers can safely be cooled with water spray and/or removed from the area, the Emergency Coordinator or Alternate (or designee) may direct employees to do so. Note that fire emergencies generally supersede spill emergencies.
 - d. After fire is put out, the accident scene will be surveyed for any other hazards and a cause analysis performed. All associated wastes will be contained and processed for disposal.

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IF A HISSING SOUND COMES FROM A VENTING DEVICE OR IF A DRUM BEGINS TO BULGE OR DISCOLOR, WITHDRAW FROM THE AREA IMMEDIATELY.

- e. The Emergency Coordinator or Alternate (or designee) will determine whether the building should be evacuated.
 - f. The Emergency Coordinator or Alternate (or designee) will be notified of any injuries or damage to the building.
3. If the fire is determined to be significant:
- a. If necessary, the Emergency Coordinator or Alternate (or designee) will order the evacuation of all personnel within the Facility using predetermined routes depicted on DRAWING 2.
 - b. All personnel and visitors will proceed to the nearest designated assembly area unless that point is affected by or downwind of the fire, in which case they will proceed to an alternate assembly point.
 - c. The Emergency Coordinator or Alternate (or designee) will notify the Glencoe Voluntary Fire Department by dialing 911 in order to give the emergency center the name and address of the Facility and the nature of the call (fire). Under extreme conditions, the Gadsden Fire Department can also be notified as a secondary or back-up option.
 - d. All feed lines and additional equipment in the area of the fire will be shut down as necessary and practical.
 - e. Upon arrival of the fire department, the Emergency Coordinator or Alternate (or designee) and employee discovering the fire will report the location and type of fire and any missing employees.
 - f. Employees shall not speak with the media. All media requests will be referred to a designated media point of contact.

After the incident is complete, the Emergency Coordinator or Alternate (or designee) and person discovering the fire will document the incident.

During the emergency, the Emergency Coordinator or Alternate (or designee) should be aware of the following:

1. If the Facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator or Alternate (or designee) must monitor for leaks, pressure build up, gas generation, or ruptures in valves, pipes or other equipment, as appropriate.
2. No waste or other materials that may be incompatible with the released material should be treated, stored or disposed in the affected areas of the Facility until after cleanup procedures are completed

3.13 Notification

If the Emergency Coordinator or Alternate determines that the Facility has had a release, fire, or explosion which could threaten human health or the environment outside the Facility (release of hazardous waste or hazardous waste constituents from the active portion of the Facility is defined as such a threat), he must report his findings as follows:

1. If the assessment indicates that evacuation of local areas may be advisable, the Emergency Coordinator or Alternate will immediately notify appropriate local authorities. The Emergency Coordinator or Alternate will

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be available to help appropriate officials decide whether local areas should be evacuated; however, any decision to evacuate will be made by local officials.

2. The Emergency Coordinator or Alternate will immediately notify the **Alabama Emergency Management Agency (available 24-hours / 7 days per week [24/7]), the National Response Center (24/7), and the ADEM (normal business hours are 8:00 AM and 5:00 PM., Monday through Friday)**. See SECTION 1 for all contact and reporting names and numbers. The report will include:

- a. Name and telephone number of reporter;
- b. Name and address of Facility;
- c. Time and type of incident (e.g., release, fire);
- d. Name and quantity of material(s) involved, to the extent known;
- e. The extent of injuries, if any; and
- f. The possible hazards to human health or the environment outside the Facility.

3.14 Requirements Following an Emergency

Prior to resumption of operations, the Emergency Coordinator or Alternate will ensure that all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use.

The Facility must note in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan. Within 15 days after the incident, the Emergency Coordinator or Alternate (or designee) will submit a written report on the incident to the ADEM.

That report will include:

- 1. Name, address, and telephone number of the owner or operator.
- 2. Name, address, and telephone number of the Facility;
- 3. Date, time, and type of incident (e.g., fire, explosion);
- 4. Name and quantity of material(s) involved;
- 5. The extent of injuries, if any
- 6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- 7. Estimated quantity and disposition of recovered material that resulted from the incident.

4 Personnel Training

4.1 Training will be given to facility personnel whose duties have a direct effect on hazardous waste management and/or hazardous waste accumulation, whether by direct contact with the hazardous waste or through hazardous waste management activities. Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the ADEM and EPA requirements and will include all elements of the regulations.

4.2 Training Director

4.2.1 This program will be directed by a person trained in hazardous waste management procedures and will include instruction that teaches facility personnel hazardous waste management procedures, including implementation of the Contingency Plan, relevant to their positions.

4.3 Training Program

4.3.1 At a minimum, the training program is designed to ensure facility personnel are able to respond effectively to emergencies by familiarizing themselves with emergency procedures, emergency equipment, and emergency systems. Facility personnel will be directed in the procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment, automatic waste feed cut-off systems, communications or alarm systems, response to fires or explosions, response to groundwater incidents and shut down operations.

4.3.2 All emergency response team members are trained to 29 CFR 1910.120(q). Facility personnel will be given the required training within 6 months after the date of their employment or assignment or to a new position at the facility, whichever is later. They are not allowed to work unsupervised until they have successfully completed the training program, thereafter an annual review will be conducted.

4.4 Documentation

4.4.1 The following documents and records will be maintained at the facility;

- Written job description of each position
- Job title
- Name of employee filling the position
- Written description of the type and amount of training given
- Documentation of training | Training records for former employees will be maintained onsite for at least a minimum of 3 years from the date the employee last worked at the facility. Training records for current employees will be maintained onsite until closure of the facility.

5 Condition of Containers

- 5.1 This section addresses the condition, handling, and storage of containers at the facility. The wastes received at this facility are contained in DOT approved containers that are compatible with the waste within. All containers are inspected for rusting or structural defects prior to being stored. If a container is determined to be leaking the contents are transferred to another container that is in good condition or processed immediately.
- 5.2 All containers are stored in the appropriate containment system with adequate volumes (see section 10 CONTAINMENT).
- ### 5.3 Management of Containers
- 5.3.1 All containers that contain waste materials are kept closed during storage except when adding or removing waste.
- 5.3.2 All containers are handled in such a way as to minimize the possibility of rupture, leakage, or other damage to the container.
- 5.3.3 All containers greater than thirty (30) gallons will not be stacked more than two high.

5.4 Shredding

- 5.4.1 The upgraded shredder unit was installed in Building #4 and operations began in late March of 2017. In a letter dated 12/15/2016 CEA notified the Department that the shredder unit and dewatering screw conveyor (Model MS 4220) was replacing the model # MS-2817 that was originally approved in the 2013 permit application. In March of 2019 CEA submitted a Class I MOD to relocate the existing shredder from Building #4 and into Building #2. CEA is submitting a Class II MOD in June 2019 to add an additional second identical shredding unit which will sit side by side to allow for both units to feed processed material directly into an end dump trailer that will be positioned within the containment of the building. Refer to drawing A2.1 dated 3.15.2019.

CEA receives containers of expired medicines or pharmaceuticals as either non-regulated or as RCRA hazardous waste such as P and U listed wastes. The containers are rigid in design, UN rated, and approved by D.O.T. for such type of pharmaceutical waste. The containers of pharmaceutical wastes will be received and checked in. These pharmaceutical wastes will then be processed in the shredder. The technicians working in this department conduct a quality control inspection to identify off-spec materials that are not desirable for shredding or prohibited for receipt by the facility. Material can be fed to the shredder via a conveyor belt, or manually in which employees remove the lids from the containers and dump the contents into a hopper. The technicians visually inspect the contents as they dump the material to look for non-conforming waste that may have been inadvertently packaged by the generator. The contents of the hopper (when full) are dumped into a shredder for final processing. The shredded material drops down into a collection hopper or through a dewatering screw into an end dump trailer. The shredded debris will be sent to a RCRA incinerator or to a cement kiln as fuel. Liquids from the shredded material will be pumped out of the hopper into a tote. If the resulting liquids are amenable to fuel blending the tote will be transferred to the tank farm for fuel blending (directly into a tanker for outbound disposal; not fuel blending into the tank farm i.e. T-1 through T-6), otherwise it will be shipped off site for RCRA incineration.

5.5 Inspections

- 5.5.1 Inspections shall be accomplished in accordance with the schedule set forth in Section 7 INSPECTIONS.

6 Tank Systems

6.1 Purpose

CEA currently holds a RCRA Part B Permit which expires in September 25, 2024. This Tank Assessment Report is prepared, certified and submitted in satisfaction of requirements found in the State of Alabama Department of Environmental Management Administrative Code, 335-14 (Revised Effective March 26, 2013); specifically, Chapter 335-14-5, Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, Section 10, Tank Systems.

6.2 Scope and Organization of the Certification

There are six aspects of a tank certification. This Tank Assessment Report is organized to address each of the aspects described below.

- 6.2.1 First, the structural integrity of the tank(s) must be determined. The focus of this aspect is to ensure the tanks have the structural strength to hold the hazardous waste that is to be stored and that the tanks are constructed of a material that is compatible with the waste stored.
- 6.2.2 The second aspect is the structural integrity of the support system that holds the tanks. The focus is to ensure that the structural supports can hold the tanks when they are full and that the supports are adequately designed to withstand seismic and wind loads.
- 6.2.3 The third aspect is the foundation on which the tank(s) and the supports rest. The focus is to determine if the foundation can support the fully loaded tanks and supports. Both frost heave and flotation due to hydraulic saturation should be considered if applicable.
- 6.2.4 The fourth aspect addresses corrosion. The focus is to ensure the materials used in the construction of the tanks and ancillary systems are compatible with the wastes stored. Special considerations apply if the tank(s) are in contact with the soil.
- 6.2.5 The fifth aspect examines the adequacy of secondary containment. The focus of this aspect is on both the structural integrity of the containment and on the ability of the containment to hold at least 100% of the volume of the largest vessel. Coating compatibility is also examined.
- 6.2.6 The sixth aspect addresses piping and ancillary equipment. The focus of this aspect is to ensure piping and ancillary equipment is in containment and can be visually inspected daily.

6.3 Background

- 6.3.1 CEA began operations in June of 2016. The original facility received its Interim Status permit in 1986. The facility was grandfathered into the RCRA program and granted its Part B Permit in 2004.

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6.3.2 CEA is a full-service waste management company. The company is a fully permitted Part B facility located in Etowah County, Alabama at 402 Webster Chapel Road, Glencoe, AL 35905. The permitted active site is 7.3 acres surrounded by 32 acres of woodland property, which is also owned by CEA. Security is maintained 24 hours per day, 7 days per week, by CEA personnel, security guards, and surveillance cameras. The facility is surrounded by a 6-ft. chain-link fence with a 3-strand barbed wire overhang and has controlled access.

6.3.3 CEA receives hazardous and non-hazardous waste from several business sectors: industrial, medical, and governmental. Waste and chemicals that are eligible for beneficial reuse are transported to CEA for storage, repackaging, and recycling. Wastes are beneficially reclaimed or reused and disposal. CEA has a wide range of capabilities for managing various waste streams from hazardous to non-hazardous waste processing to include fuels blending, bulking, lab packaging, and unpacking.

6.3.4 This Tank Assessment Report addresses CEA fuels blending operations. It is the goal of CEA to maximize the waste-to-energy programs available. CEA receives spent solvents and ignitable wastes and blends them to maximize their Btu content.

6.4 Process Description

CEA receives, and blends spent solvents and other ignitable hazardous wastes. The company receives wastes by tanker, by van, in containers, or by bulk shipment.

6.4.1 Hazardous Characteristics of Wastes

The exact characteristics of the waste stored at CEA vary daily. Based on experience, the following accurately describes the waste potentially present at any one time.

- Waste flammable liquids with a Flash Point < 140 F
- pH: 4-10
- Heat content > 10,000 Btu

The following are the waste codes that may be present in the blended mixture: D LISTED WASTES, F LISTED WASTES, K LISTED WASTES, P LISTED, and U LISTED WASTES.

6.4.2 Delivery by Tanker

Waste that is delivered in tankers is offloaded directly into the storage tanks. (There are six, 15,000-gallon storage tanks located in a nest within secondary containment.) On occasion, the tanker's internal pump is used to move the hazardous waste into the storage tanks. More frequently, one of the pumps located in the storage tank secondary containment area is used. Tankers are parked next to the storage tank containment area on a coated concrete pad that slopes into the containment area. The tanker uses its hoses to attach to the manifold that services the storage tanks. The intake manifold that services the tanker is in a trench so that all piping leading from the tanker to the storage tanks is visible. Any leak which may occur in the transfer of hazardous waste from the tanker to the storage tank would be immediately observed. Because the tanker sits on a coated concrete pad that slopes into the containment area, and because the piping used to transfer the hazardous waste is in a trench that also slopes into the containment area, no release of hazardous waste to the environment is likely. Any hazardous waste that is spilled during transfer would drain into the secondary containment area. At the time of my observation, there was no evidence of any spill on the coated concrete near the intake manifold or in the

coated trench containing the piping servicing the tanks.

6.4.3 Waste That Arrives in Containers

Containers are pumped by a dedicated pump through piping that is in a coated trench to the storage tanks.

6.5 Regulated Tanks

The following tanks and ancillary equipment are regulated and are addressed in this report.

Description	Size/Capacity	Number	Location	Composition
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#1	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#2	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#3	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#4	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#5	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#6	Containment Area	0.45 inch plate steel

6.6 Assessment

6.6.1 Structural Integrity

The ultimate structural integrity of the tanks is determined by visual inspection, through the analysis of ultrasound reports, and by the application of API 653 (Tank Inspection and Repair) standards. All tanks present have been in continuous service in excess of 14 years. Requirements to observe and document proper installation of the tanks were addressed in the November 1991 BCM RCRA Tank Assessment submitted to, and on file at, ADEM. Similarly, the ADEM code requires tanks to be leak tested prior to being put into service. Neither BCM in 1991 nor HGS at present can locate documentation that leak testing was performed. The tank systems have been in service for 14 years and there is no evidence of leaking.

6.6.2 Storage Tanks

CEA utilizes six (6) above ground atmospheric tanks that have a volume of 15,000 gallons each. The tanks are 21.16 feet high and have a diameter of 11.44 feet. The tanks are conical and are constructed of 0.45-inch carbon plate steel. The tanks were originally constructed in approximately 1945 by Sharpville Steel Fabricators, Inc. They were constructed as pressure vessels. The company is no longer in business and the standard to which the tanks were constructed is not known. Regarding compliance with NFPA 30 requirements that prescribe minimum spacing standards, Table 22.4.1.1(b) of the 2008 Edition of the *Flammable and Combustible Liquids Code Handbook* was reviewed. The storage tanks comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys or an adjoining property line.

Visual inspection of each of the tanks revealed no noticeable corrosion, punctures, indentations or other defects. Ultrasound inspections were performed on each tank on July 16, 2013. A total of 32 measurements were taken on each tank. The minimum observed thickness was 0.262 inches.

T (actual) = 0.262 inches

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Calculation of the minimum allowable tank thickness following API 653, Edition 3, Section 4.3.3.1 is provided below.

$T(\min) = (2.6HH-1)(D)(G) / (S)(E)$ Where:

D = tank diameter H=height S= 0.429T

Y= yield strength of plate or 30,000 psi if not known

G= highest specific gravity of material stored

T= tensile strength of plate or 55,000 psi if not known

E=joint efficiency or 1.0 if not known

$T(\min) = (2.6)(20.16)(11.44)(1.4) / (23,595)(1.0)$ $T(\min) = 0.0356$ inches

$T(\text{actual}) > T(\min)$

The results of the ultrasound testing reflect adequate steel is present to hold the hazardous waste stored.

6.6.3 Structural Integrity of the Tank Support System

John Funk, PE of David Funk Engineering, Inc. was commissioned to assess the adequacy of the storage tank support system. His report of findings is found at Attachment 3.

Based on the findings of the structural engineer, the support system for the storage tanks is adequate to support the tank and its full load.

6.6.4 Foundations

As described in the November 1991 BCM Tank Assessment Report, "The tanks are resting on a slab foundation and, as such, the tanks are not in contact with the soil or water."

The foundations and sub-grade of the floor slab upon which the tanks sit are compacted native soils overlain by 2-4 inches of compacted crushed Limestone. Compaction tests were not performed on the sub-grade after compaction, and prior to construction; however, the facility has operated with fully loaded tanks for about two years with no noticeable settlement of the structure. The plant site is not influenced by any known fault system, therefore, any uplift pressures that might be experienced would be inconsequential pressures caused by the expansion and contraction of the clay in the native soil (generally less than 10% of the total soil composition).

The...tanks are not subject to dislodgement or flotation since they are not located in a saturated zone. Seismic action is not a likely cause of structural failure for these tanks since the geographic location is not subject to excessive seismic activity.

The facility is not located in a frost heave zone and, therefore, the tanks...are not subject to the damaging effects of frost heave."

On August 20, 1996, John Funk, PE issued a report regarding the structural adequacy of the foundation for the six storage tanks. He concluded, "...the existing concrete slab foundation is capable of safely supporting the six relocated storage tanks."

A visual inspection of the foundations was conducted by Mr. Harry Summers, PE on July 17, 2013. There was no evidence of settlement, cracks, gaps or structural damage or deterioration.

Based on visual inspection and current conditions, and on the findings of Mr. Funk, a licensed

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professional structural engineer, I conclude that the foundations are adequate to support the loads to which they are subjected.

6.6.5 Corrosion

Because the tanks and ancillary equipment are not in contact with the soil or water, a detailed corrosion analysis by a certified corrosion engineer or expert is not required. However, analysis must be performed to demonstrate that the tanks are constructed of a material that is compatible with the wastes stored for the anticipated service life of the tanks.

6.6.5.1 Storage Tanks

The storage tanks are constructed of .45-inch plate carbon steel. The plates and welds are free of defect and appear in good repair. There is no evidence of corrosion or deterioration.

Annual ultrasound results are available from 2008 to the present. Using 192 readings taken in 2008 as a baseline and comparing it to 192 readings taken on July 16, 2013, no corrosion is noted. Based on the predicted corrosion rate and the minimum thickness required for these storage tanks, the tanks have an indefinite service life.

6.6.6 Secondary Containment

Secondary containment is provided for all tanks and ancillary equipment as detailed below. CEA has selected daily visual inspection as its method of leak detection. A procedure is in place and daily inspections are being performed and documented.

6.6.6.1 Storage Tanks

6.6.6.1.1 Structural Adequacy

The structural adequacy of the containment area was addressed in a letter, dated August 20, 1996, by John Funk, a licensed structural engineer. See Attachment 2. He concluded that the containment area was structurally sound and adequate. Visual inspection of the area conducted on July 17, 2013 found that the area was free of cracks or other defects, that the coating was in good repair, and no changes had been made that could potentially impact the area's structural functionality.

6.6.6.1.2 Containment Adequacy

Secondary containment for the storage tanks is provided by an epoxy-coated, concrete liner. The liner is designed to completely encompass all the tanks. According to plant personnel and as verified by visual inspection, the concrete liner was placed as a monolithic pour without construction joints or seams. The liner has a rectangular shape with outside dimensions of 30 feet x 60 feet. The long axis of the rectangle is oriented north-south. The structure has a 0.3% slope from southwest to southeast and a 0.4% slope from north to south. A pump intake system is located in the southeast corner of the containment area for the removal of accumulated precipitation or of spilled waste. Additional secondary containment is provided by an 11.5 x 9.5-foot reinforced concrete basin. The basin has the same floor and wall elevation as the main containment area and is located at the southeast corner of the main containment area. The walls and floor were designed to prevent migration of released waste to the environment. Both the walls and the floor are structurally capable of resisting lateral earth pressure. The floor slopes toward the main containment area to provide positive drainage to the sump. Precipitation and any spilled waste accumulate in the 11.5 x 9.5-foot concrete basin area where a manually activated precipitation pump pipes it to one of the tanks in the containment area. The floor and walls of the

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containment area are coated with chemically resistant epoxy coating selected for its compatibility with the wastes present.

Volume Analysis

<u>Primary Containment 29 x 59</u>	<u>1,711 sq. ft. Additional</u>
<u>Containment 11.5 x 9.5</u>	<u>109 sq. ft.</u>
<u>Pump pit Containment 11.5 x 11</u>	<u>126 sq. ft. Total Available</u>
<u>Containment Area</u>	<u>1,946 sq. ft. Total Available</u>
<u>Volume (height 2.583 ft.)</u>	<u>5,026 cubic ft.</u>
<u>100% of Largest Tank (15,000 gallons)</u>	<u>2,005.5 cubic ft.</u>

Volume of Rainfall during a 25 year/24-hour event

6.75/12 feet x 1, 946 sq ft. 109.46 cubic ft.

Volume 100% largest tanks and rainfall 2,114.96 cubic ft.

Excess containment capacity **2,911.04 cubic ft.**

The Secondary Containment for the six (6) 15,000-gallon storage tanks is sufficient to capture a release of 100% of one of the tanks plus the accumulated rainfall of a 25 year/ 24-hour rainfall event.

6.6.7 Ancillary Equipment

The regulation requires that all ancillary equipment be supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction. Ancillary equipment must be provided with secondary containment. Aboveground piping and welded flanges, joints and connections must be inspected for leaks daily.

Pumps that support the drum pumping operation are located in the secondary containment area. Pumps that support the storage tanks are located in the storage tank containment area. All piping is welded, is visible, and is located in coated concrete trenches that drain into the storage tank containment area.

Plant personnel indicate that all pumps and piping are inspected daily for leaks.

At the time of my inspection, there were no leaks or evidence of leaks from the piping or pumps. Trenches were free of cracks or other defects. The piping appeared free of corrosion and all welds appeared to be intact.

CEA has policies in place and implemented to ensure the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite.

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6.6.8 Regulatory Crosswalk

The following table identifies the regulatory requirements of a Tank Assessment Report. It also leads reviewers to that section in this report that addresses the requirements cited.

ADEM Citation 335-14-5-.10	Description	Location in this report (page)
(3)(a)	Assessment and certification of design	15
(3)(a) 1.	Identification of design standards	Tub 6 Tank 7
(3)(a) 2.	Characteristics of hazardous waste to be handled	2
(3)(a) 5.(i)	Tank foundation will maintain the load of the full tank	Attachment 2
(3)(a) 5. (ii)	Tank is anchored to prevent flotation if it is in a saturated zone	8
(3)(a) 5. (iii)	Tanks will withstand frost heave	8
(3)(b)	Tanks were properly handled during installation	5
(3)(d)	Tanks tested for tightness prior to being placed in use	5
(3)(c)	Ancillary equipment must be supported and protected against physical damage	13
(4)(b) 1.	Secondary containment designed to prevent any migration of hazardous waste to the environment	Tub 10 Tank 12
(4)(b) 2.	Secondary containment capable of detecting and collecting releases	10
(4)(c) 1.	Constructed or lined with materials compatible with the waste stored	Tub 11 Tank 12
(4)(c) 2.	Placed on a foundation capable of supporting the secondary containment	Attachment 2
(4)(c) 3.	Provided with a leak detection system	10
(4)(c) 4.	Secondary containment is sloped	12
(4)(d) 1.	Secondary Containment must be provided with an exterior liner	12
(4)(e) 1. (i)	Liner is designed to contain 100% of the capacity of the largest tank within its boundary	12
(4)(e) 1.(ii)	Liner must have sufficient additional capacity to contain precipitation from a 25 year, 24 hour rainfall event	12
(4)(e) 1. (iii)	Liner must be free of cracks or gaps	11
(4)(e) 1. (iv)	Liner must be designed to surround the tanks completely and cover all surrounding earth likely to come into contact with the waste	Tubs 10 Tanks 12
(4)(e) 1. (v)	Liner must be provided with an	12

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	impermeable interior coating if concrete is used. The coating must be compatible with the waste stored.	
(4)(f)	Ancillary equipment must be provided with secondary containment (e.g. trenches)	13
(4)(f) 1.	Aboveground piping must be inspected daily	13
(4)(f) 2.	Welded flanges, welded joints and welded connections on ancillary equipment must be inspected daily	13
(9)(a) 2.	Special requirements for ignitable waste...the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite.	13
(9)(b)	Complies with protective distances prescribed by the NFPA	Tubs 6 Tanks 7

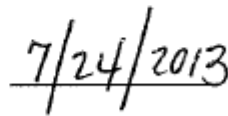
6.6.9 Professional Engineer Certification

The following certification statement is provided in satisfaction of ADEM Admin Code r 335-14-5-.10, specifically those requirements identified in Section 5.0 above.

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



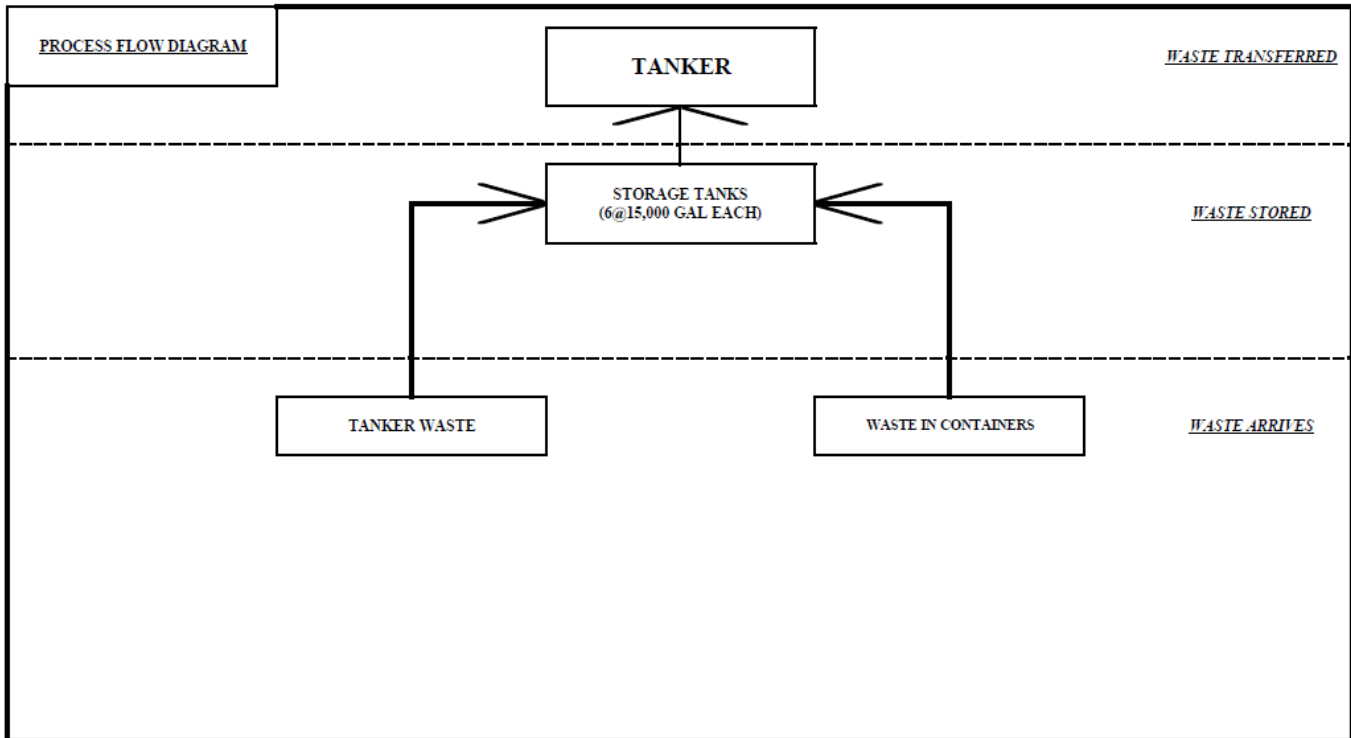
 Harry G. Summers, PE



 Date

Alabama License Number 17129

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Attachment #1 Process Flow Diagram



Attachment #2 Structural Engineer's Report – Foundation

DAVID FUNK ENGINEERING, INC.

CONSULTING STRUCTURAL ENGINEERS

P. O. BOX 480 - TELEPHONE (205) 733-8491
PELHAM, ALABAMA 35124

August 20, 1996

Mr. Scott Skipper
Skipper Engineering, Inc.
171 Woodland Drive
Rainbow City, Alabama 35906

RE: Fisher Industrial Services
Containment Slab Foundation

Dear Scott:

This office has completed a structural engineering review of an existing concrete containment slab foundation pertaining to its capacity to support six relocated storage tanks. Our review and accuracy of our conclusions rely upon information provided by the owner defined as follows:

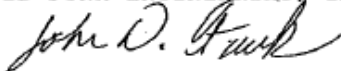
1. Relocated storage tanks are 15,000 gallon tanks to be filled with a fluid weighing 9.5 pounds per gallon.
2. The tanks are built of 0.45" thick steel plates. Each tank is supported by eight channel legs, each with a base plate measuring 5.0" by 8.0".
3. The existing slab is a minimum 12" thick, of 4000 psi concrete, with a layer of 5/8" diameter reinforcing bars on 12" centers each direction located at mid-depth of slab. A concrete containment wall around the slab perimeter is 1'-6" high, 5" wide at the top and 6" wide at the base, with reinforcing dowels embedded into the slab.

The results of our review indicate that the existing concrete slab foundation is capable of safely supporting the six relocated storage tanks. Each tank leg can be anchored to the existing slab with a 1" diameter "Hilti Kwik Bolt", 4-1/2" embedment into concrete. See the enclosed sketch. If interference occurs from an existing stiffener, a new plate can be welded to the edge of an existing base plate to receive a new anchor bolt.

If we may be of further service in the matter, please advise.

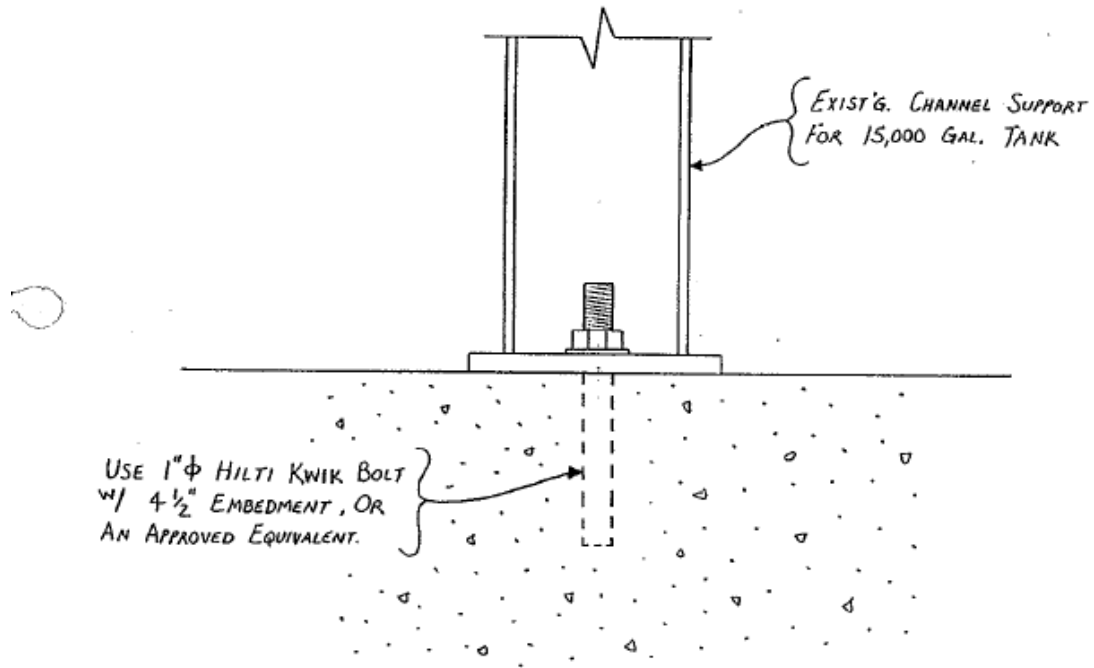
Sincerely yours,

DAVID FUNK ENGINEERING, INC.



John D. Funk, P.E.

Enclosure



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Attachment #3 Structural Engineer's Report – Structural Steel Assessment

DAVID FUNK ENGINEERING, INC.

CONSULTING STRUCTURAL ENGINEERS
TWO RIVERCHASE OFFICE PLAZA, SUITE #124
HOOVER, ALABAMA 35244-2810
TELEPHONE (205) 733-8491

July 23, 2013

VIA EMAIL TO harry@hgsengineeringinc.com
ORIGINAL VIA U.S. MAIL

HGS Engineering, Inc.
ATTN: Mr. Harry Summers
1121 Noble Street
Anniston, AL 36201

RE: 15,000 Gallon Storage Tank Frames
EWS Alabama, Inc.
402 Webster Chapel Road
Glencoe, Alabama 35905

Dear Mr. Summers:

This office has completed a structural engineering review of six tank frames located at the above mentioned facility. The purpose of the review is to determine whether each frame can safely support a 15,000 gallon tank and its contents. Our review and accuracy of our conclusions rely upon information provided by either HGS or the tank owner and is defined as follows:

1. The tanks have a 15,000 gallon capacity to be filled with fluids weighing 9.5 pounds per gallon.
2. The tanks are built of 0.45" thick steel plates. Each tank is supported by eight channel legs, each with a base plate measuring 5.0" by 8.0".

The undersigned visited the site on July 22, 2013, to inspect the frames on each of the tanks. Five of six tank frames are built exactly the same way. One different frame had 1/2" thick by 6" wide by 4'-0" long plates welded to the flanges of the channel legs starting approximately 2 1/2" above the top of the concrete slab. There was no indication as to why these plates were added to the channel legs. The addition of plates will increase the lateral stability of the channel legs.

Repair work was observed on one channel leg of one tank frame. It appeared the flanges of the channel leg were damaged and repaired by adding a plate 1/2" thick by 1 1/2" wide

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Mr. Harry Summers
EWS Storage Tank Frames
July 23, 2013
Page 2 of 2

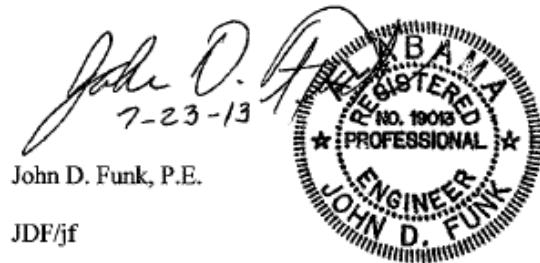
by 10" long to the exterior side of each flange of the channel. No other modifications were observed on any of the other tank frames.

The results of our review indicate the tank frames are capable of safely supporting the tanks and contents including the additional overhead walkway supported at various channel legs. Unless there are reasons unknown to us, it is recommended each channel leg be anchored to the concrete slab with one 1" diameter Hilti Kwik bolt with a 4 1/2" embedment into the concrete slab. Follow the manufacturer's recommendations when installing the anchor bolt.

Should you wish to discuss the contents of this report, or if we may be of further service in the matter, please advise.

Sincerely yours,

DAVID FUNK ENGINEERING, INC.


John D. Funk, P.E.
JDF/jf

DAVID FUNK ENGINEERING, INC., TWO RIVERCHASE OFFICE PLAZA, SUITE #124, HOOVER, ALABAMA 35244-2810

7 Facility Inspections

7.1 The inspection of the facility components and equipment is an integral part of an overall personnel safety and environmental security program. The purpose of this section is to describe the procedures for inspecting the hazardous waste management units at the facility and to establish a schedule for conducting the inspections. Routine inspections are required to detect equipment malfunctions, deterioration, leaks, discharges and unauthorized entry.

Inspections are conducted on a predetermined schedule. Identified problems are noted in the Inspection Report. The nature of the problem, the date and time the problem is discovered, is noted on this report. An example inspection log is included in this plan for illustrative purposes. The Facility Manager or designated representative will assess the problem and have necessary repairs and/or replacement of equipment identified as defective or damaged. Repair/replacement of affected equipment will be completed on a priority basis, as soon as possible or practical. The date, time, and nature of the repair or replacement action taken is then documented on the Work Order which is then given to the Plant Manager. The documents are retained on file for an indefinite period of time (i.e., not less than 3 years).

7.2 Subpart BB - Air Emission Standards for Equipment Leaks

7.2.1 CEA (CEA) has implemented the following program for Leak Detection and Repair (LDAR) for the six (6), fifteen thousand (15,000) gallon storage tanks located in the tank farm containment area of the facility. The key elements of the plan that will be addressed in this program are as follows:

- Maintaining a leak rate goal below detectable limits (<500ppm)
- A listing of all equipment that has the potential to leak
- Procedures for identifying leaks
- Procedures for repairing leaks
- Procedures for evaluating new or replacement equipment that will minimize or eliminate leaks
- A listing of LDAR personnel and a description of their roles and responsibilities
- Procedures for evaluating new construction to identify components that may be subject to the LDAR requirements
- Procedures for submitting updates or additions to the LDAR program to the required agencies
- Procedures for identifying regulated components
- Monitoring
- Inspection
- Recordkeeping
- Best Management Practices (BMP)

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7.3 List of Equipment subject to the program:

COMPONENT	CODE
Blind Flanges	BFL
Couplers	C
Cap	CA
Double Tee	DT
Elbow	E
Flange	FL
Hand Valve	HV
Opening	O
Man way's	MW
Tee	T
Tank	TK
Union	U
Pump	P

7.4 Procedures for Identifying Leaks

- 7.4.1 Detection of leaks is an ongoing process, detected by daily visual inspections and Method 21.
- 7.4.2 Daily visual inspection: At least daily a visual inspection is performed. This inspection includes both a visual and auditory inspection of tank farm components. An auditory inspection consists of listening for hissing, dripping, etc. The results of this inspection will be noted on the Daily Inspection form.
- 7.4.3 Monthly monitoring using Method 21, monitoring for leaks is completed monthly and/or quarterly as specified and appropriate. This is accomplished by the tank farm supervisor, the Assistant Plant manager, and/or the EH&S Manager or designee. Equipment used is PhotoVac MicroFID, or equivalent equipment. Any personnel that has been tasked to conduct monitoring shall be trained on how to calibrate and use the testing equipment (see training in section) prior to use. The EH&S Manager takes recorded readings and compiles them results into a report that is kept on site.

7.5 Procedures for Repairing Leaks

Once a leak is discovered either visually or during monthly monitoring, the leaking component is isolated and contained. Any spilled material is cleaned up and notification is given to the Plant Manager or direct supervisor. The Plant Manager will evaluate the leak and generate a work order for the repair(s). One copy of the work order will be placed in the Daily Inspection Log book, and one copy will be given to the EH&S Manager. The Facility Manager will arrange for repairs to be accomplished either by plant personnel or an outside source. Once repairs have been completed the work order shall be updated by the individual performing the repair. This completed work order must include the following information:

- Name of person performing the repair
- What repairs were completed
- What repairs were not accomplished and the reason(s)
- Date of repair
- Results of visual inspection of installed components
- Verification by the Assistant Plant Manager, Plant Manager, or the EH&S Manager that the repair(s) have been completed.

7.6 Delay of Repair

- 7.6.1 No component will be placed back into service until repairs are completed unless this involves a process unit shutdown. If a component cannot be repaired because a process unit must be shut down to perform the repair, and then the component shall be placed on the Delay of Repair List. For any component placed on the Delay of Repair List, the following information must be recorded:
- Identifying number and description of component
 - An explanation of why the component cannot be repaired
 - An estimated date of repair

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7.6.2 Repairs shall be accomplished for components that have been placed on the Delay of Repair List before the end of the next hazardous waste management unit shutdown (40 CFR 264.1059(a)). Repair for pumps and valves must be accomplished as soon as possible but no later than six months after the leak was detected (40 CFR 264.1059(d)(2) (pumps), and (e) valves). Once repairs have been accomplished, monitoring should be done over several days to ensure that the leak repair is successful.

7.7 Procedures for Evaluating New or Replacement Components

7.7.1 All new or replacement components that are replacing components that were identified as leaking during the last monitoring cycle shall be visually inspected for leaks at the time the component is placed into service. Those components installed by an outside contractor or other entity shall be inspected by plant personnel prior to being put into service.

7.7.2 All components shall be monitored using method 21 immediately or no later than the next scheduled monitoring cycle. This is not to exceed 30 days from the time the component is installed. Components that are installed as part of preventive maintenance must be monitored using method 21 during the next monitoring cycle. All new components that are installed either as a result of leak detection or preventative maintenance must be tracked using the work order program defined in section 4.0.

7.8 LDAR Personnel

The following Facility personnel are the individuals that will be adequately trained to perform LDAR inspections, monitoring and their associated duties and responsibilities.

Facility personnel will be adequately trained to perform LDAR inspections, monitoring and their associated duties and responsibilities.

Title	Responsibility
Plant Manager	<ul style="list-style-type: none">• Generation of work orders• Verification of repairs• Dissemination of work orders• Tracking work orders
Assistant Plant Manager	<ul style="list-style-type: none">• Verification of repairs• Dissemination of work orders• Method 21 monitoring• Daily Visual Inspection
Tank Farm Supervisor	<ul style="list-style-type: none">• Verification of repairs• Repair or replacement of leaking components• Preventative maintenance repairs• Method 21 monitoring• Daily visual inspections

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Maintenance	<ul style="list-style-type: none">• Repair or replacement of leaking components• Preventative maintenance repairs
EH&S Manager	<ul style="list-style-type: none">• Generation of work orders• Tracking work orders• Recording work• Verification of repairs• Method 21 monitoring• Recordkeeping• Report generation• Program maintenance

7.9 Program Updates

- 7.9.1 Updates will be accomplished by the EH&S Manager whenever any of the following occur:
- New components are added
 - New personnel are added, or
 - Roles or responsibilities of current employees are changed
- 7.9.2 Program updates will be sent to the Alabama Department of Environmental Management.
- 7.9.3 Procedures for Identifying Regulated components will be accomplished at the time of installation.

7.10 Monitoring

- 7.10.1 Monitoring shall be accomplished conducted by facility personnel. The equipment used shall be the PhotoVac MicroFID or equivalent. Monitoring shall be in accordance with the following schedule:
- Pumps – monthly
 - Valves, connectors, flanges, fittings, etc. - *monthly
 - Tanks – monthly
- 7.10.2 Diaphragm type pumps meet the specifications in 40 CFR 264.1052(e) [ADEM Admin. Code Rule 355-14-5-.28(3)] and therefore only require annual monitoring. These pumps must operate with no detectable emissions as determined at annual monitoring and initial designation. CEA operates only diaphragm type pumps in light liquid service, and assumes these pumps are used greater than 300 hours per calendar year.
- 7.10.3 This schedule shall be followed for six consecutive months. If after the sixth month no more than 2% of all listed components are above the threshold of 500 ppm then these components shall go to a quarterly monitoring schedule until greater than 2% of all components monitored are above the 500-ppm threshold.
- 7.10.4 Components deemed Unsafe to monitor:
- 7.10.4.1 All unsafe or difficult-to-monitor components must be included on a log with identification numbers and an explanation of why the component is “unsafe to monitor” or “difficult to monitor.” Monitoring can be deferred for all such components, but the facility must maintain a plan that explains the conditions under which the components become safe to monitor or no longer difficult to monitor.

7.11 Inspection

- 7.11.1 Visual inspections of the LDAR components are accomplished daily during operational days. The only exception to this is that on weekends one of the members of the security team will conduct the visual inspection except for the tops of the tanks due to safety concerns.

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7.12 Recordkeeping

7.12.1 All records and reports shall be generated and kept by the EH&S Manager. All records shall be kept for a minimum of three years and be made available upon request to representatives of the Alabama Department of Environmental Management and/or EPA. See Appendix A for a representative copy of the log used to record monitoring results. This format and/or the contents may be changed to accommodate changes to the regulations, the addition to or subtraction from components, or changes to the monitoring plan.

7.13 Best Management Practices

7.13.1 All results should be entered into a spread sheet for easier maintenance. Results shall be entered into a report by the EH&s manager or other designated employee.

7.13.2 A review of the LDAR program shall be conducted no less than once every four years.

7.13.3 Before any monitoring is accomplished every effort will be taken to ensure that all components can be monitored safely and that all obstructions are removed prior to monitoring.

7.14 Training

7.14.1 Training shall take place initially before any duties are carried out, and at least annually thereafter. Training shall be conducted by a qualified trained personnel for all new employees, or by another qualified individual. All training shall be documented and maintained in the employee training file and shall be kept by the EH&S Manager.

8 Record Keeping

8.1 This document covers the records that are required to be kept at CEA, Inc. per ADEM regulations. This document addresses the type, retention, and procedures that will be followed with regard to the records that are required to be kept per ADEM code 355-14-3-.04, 355-14-4-.02, and 355-14-5-.05.

Records to be kept:

Type	Retention Time
Signed Manifests	3 years
Designated Facility Manifests	3 years
Biennial Report	3 years
Exception Report	3 years
Closure Report	3 years
Test results, waste analyses	3 years
Operating Record	3 years
Waste Minimization Plan	3 years

8.2 Biennial Report

This report must be prepared and submitted to ADEM by March 1 of each even numbered year. The biennial report shall contain the following information:

- EPA Identification number
- Calendar year covered
- EPA identification number, name, and location address for each off-site TSDF to which waste has been shipped during the year
- The name and EPA identification number of each transporter used to ship hazardous wastes to each TSDF.
- Description, EPA waste number, USDOT hazard class, and quantity of each hazardous waste shipped off-site to each TSDF.
- Description of the efforts undertaken during the year to reduce the volume and toxicity of wastes generated.
- Description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984.
- Any other information requested in the biennial report.

8.3 Exception Reporting

If CEA does not receive a copy of the manifest with a hand-written signature signed by the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter, CEA, as the generator of the waste must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

CEA must submit an Exception Report to ADEM if we have not received a copy of the manifest with the hand-written signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The exception report must include the following:

- A legible copy of the manifest for which the generator does not have confirmation of delivery
- A cover letter signed by CEA, or its authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.
- For rejected shipments of hazardous waste or container residues contained in non-empty

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containers that are forwarded to an alternate facility by a designated facility using a new manifest (see 335-14-.05(3)(e)(1 through 335-14-6-.05(3)(e)1-6) the generator must comply with the above.

8.4 Closure Reporting

As a large quantity generator of hazardous waste, CEA, must notify ADEM no less than 45 days prior to the expected date of the beginning of closure of:

- Cessation of storage in, or moves container storage areas
- tanks systems
- drip pads and/or containment buildings

The notification to ADEM must include the following:

- Generators name, address, and EPA identification number
- The date the closure is expected to begin, and a timeframe for completing closure activities (not to exceed 180 days)
- A description of the units to be closed, and a site diagram identifying each unit
- The procedures to be used for closure
- The type and maximum volume of hazardous wastes stored in the unit at any time and the associated EPA hazardous waste numbers
- The type and amount of hazardous waste expected to be stored in the unit at the time closure activities are expected to begin
- The condition of the units at the time of the notification
- Plans for hazardous waste determinations on, and proper management and disposal of, stored wastes, unit components, investigation derived wastes, and decontamination wastes.

Within 45 days after completion of closure CEA, must provide a written report documenting the procedures used to comply with rule(s) 335-14-3-.03(5)(a)5, 335-14-6-.09(9), 335-14-6-.10(8), 335-14-6-.23(6), and/or 335-14-6-.30(3).

8.5 Transporters

CEA as the transporter of any hazardous waste must keep a copy of the manifest signed by the generator in accordance with what is listed below under “generator requirements” for a period of three years from the date the waste was accepted by the original transporter of the waste, or until CEA receives a signed copy from the facility that received the waste.

8.6 Operating Record

CEA must keep a written operating record. The following information must be recorded, as it becomes available and maintained in the operating record for three years.

- A description of and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by 335-15-5-Appendix I. This information must be maintained in the operating record until closure of the facility.
- The location of each hazardous waste within the facility and the quantity at each location. This information must be cross referenced to manifest document numbers if the waste was accompanied by a manifest. This information must be kept until closure of the facility.
- Records and results of waste analyses must be kept for three years.

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- Summary reports and details off all incidents that require implementing the contingency plan must be kept for three years. Records and results of inspections must be kept for three years.
- Monitoring, testing, or analytical data, and corrective action where required by ADEM rules must be kept for three years.
- Closure cost estimates must be kept until closure of the facility.
- Waste minimization program must be reported annually and kept for three years.

9 Closure

9.1 Partial and Final Closure

Partial Closure, should it be necessary prior to final closure, will be made in accordance with the Closure Plan procedures and will be accomplished in the same manner as specified for Final Closure, using the methods, equipment, and procedures applicable to that unit of the facility. Final Closure will be accomplished in accordance with provisions outlined in this section.

9.2 Current Treatment/Storage Tanks Maximum Design Capacity

CAPACITIES TANKS			
ITEM	QUANTITY	NET CAPACITY (gallons)	GROSS CAPACITY (gallons)
Storage/Treatment Tanks	6	15,000	90,000
Total Capacities		15,000	90,000

CAPACITIES DRUM STORAGE			
NOTE: A 55 GALLON EQUIVALENT IS USED			
ITEM	QUANTITY	NET CAPACITY (gallons)	GROSS CAPACITY (gallons)
Building #1	1,840	55	101,200
Building #4	420	55	23,100
Building #2	1,780	55	97,900
Building #3	960	55	52,800
Total Capacities			275,000

9.3 Closure Tasks

The following is a general outline of the tasks necessary to effect closure of this facility. Specific details of these tasks are covered in subsequent sections of this document. Methods for decontaminating this facility have been selected based on best available information at this time. However, the final engineering details of the Closure Plan will be submitted to ADEM/EPA in an Engineering Plan 45 days prior to proposed commencement of closure. This plan will include the results of a bench scale treatability study designed to validate the methods proposed for use in this document and to do a final engineering design on the closure. Additionally, other appropriate technologies will be evaluated in this study which may provide more thorough decontamination of the facility under conditions that are more appropriate with respect to worker safety and to the environment and that generate the least hazardous waste to be managed. Figure 1 summarizes the major closure tasks and the sequence in which they will be carried out.

9.4 Figure 1 Closure

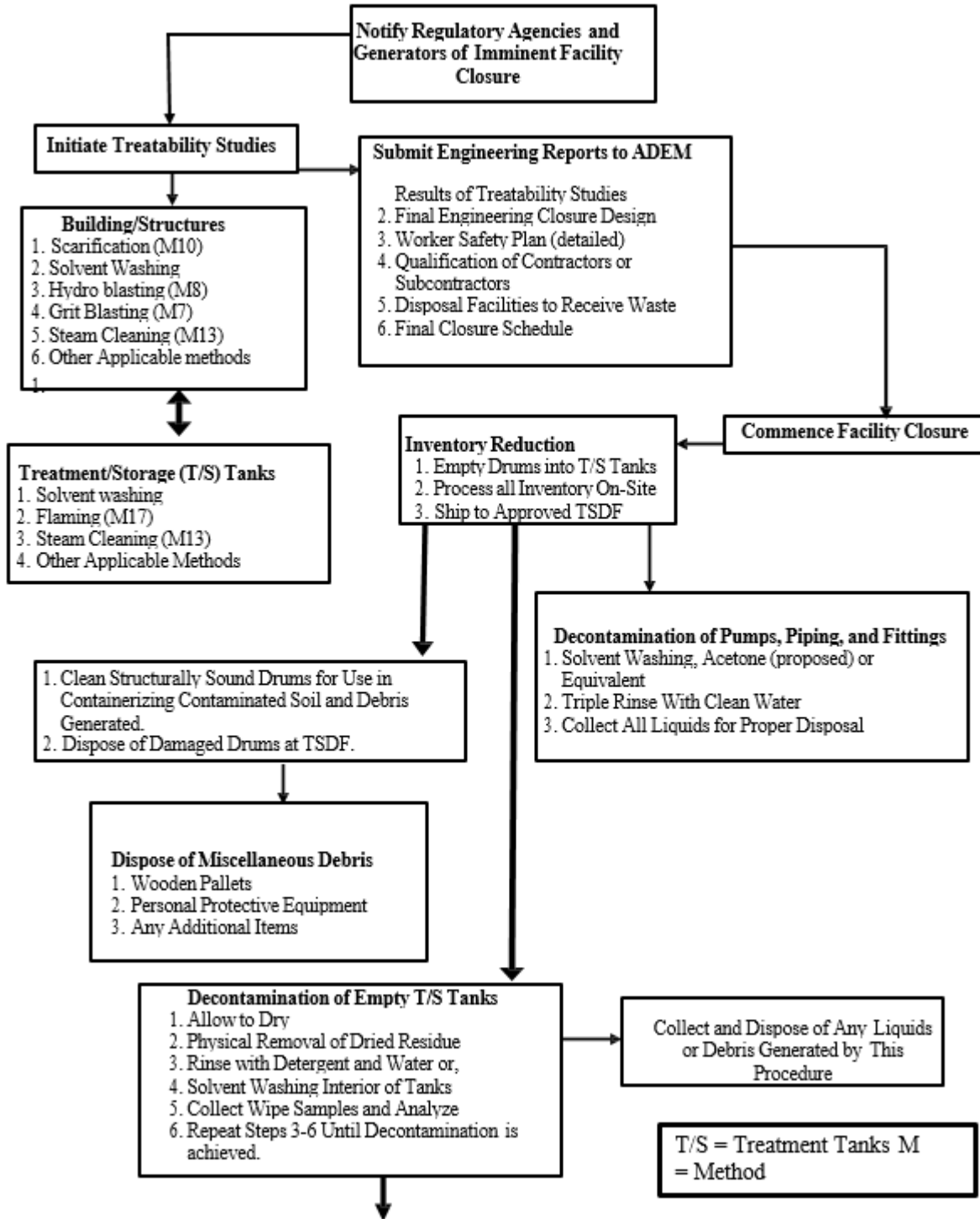
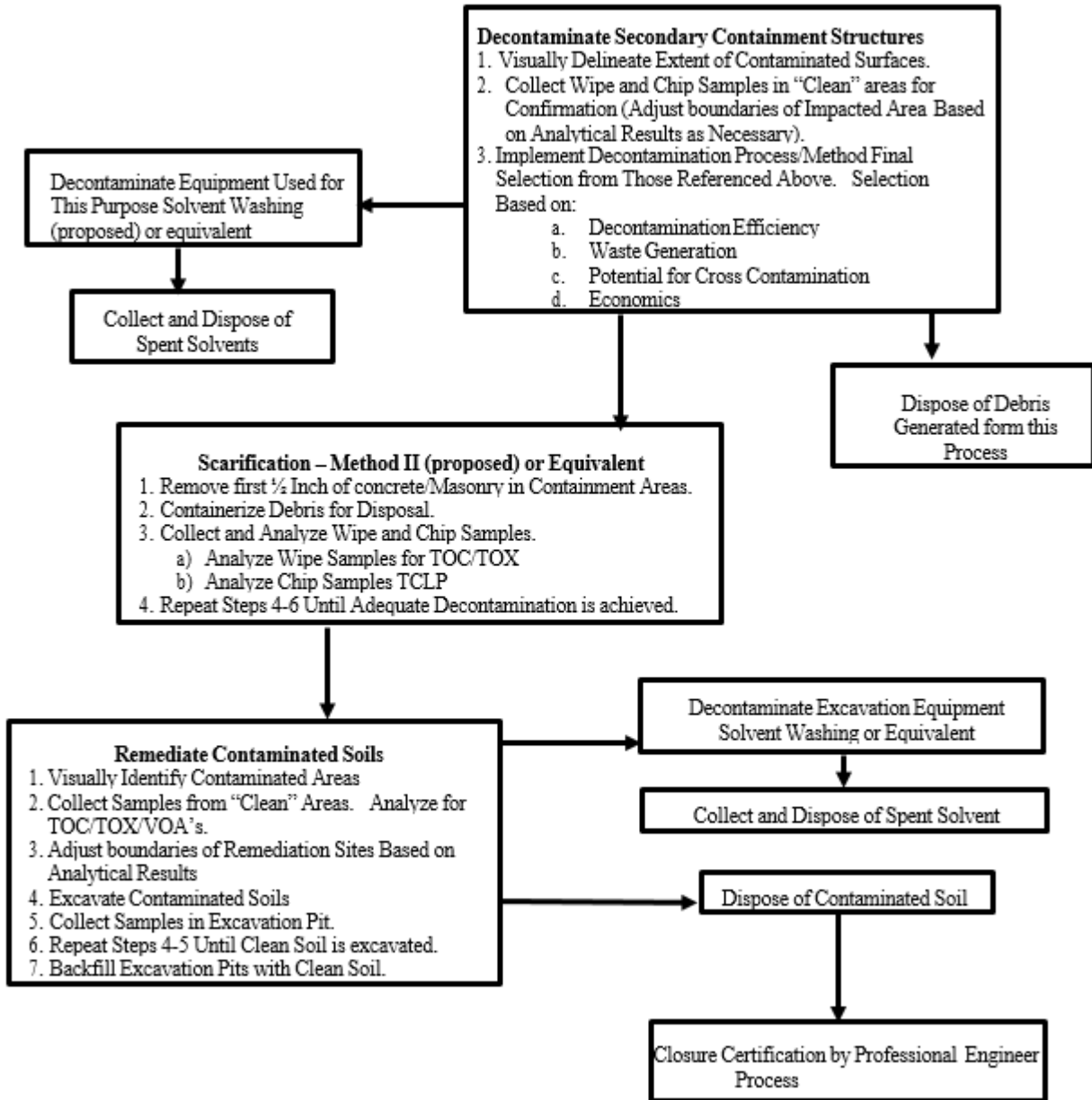


Figure 1 Closure (Continued)



9.5 Closure Details

9.5.1 Generators will be notified of imminent closure so that they may seek other sources of waste management. Bench scale treatability studies will be conducted to verify that the method and materials (i.e.; solvents, etc.) proposed in this plan are appropriate to the closure of this facility. Additionally, new technologies will be investigated for possible application in the closure of this facility. The results of this study will be submitted to ADEM 45 days prior to the implementation of this plan.

9.5.2 Submittal of a final Engineering Plan 45 days prior to the closure commencement to ADEM/EPA for review. This engineering plan will be consistent with actual and operating facility design as approved in the permit. The plan will ensure that any changes to the facility will be submitted to ADEM by means of a permit modification. Prior to submittal of this report, a bench scale treatability study will be conducted. The purpose of this study is to verify that the proposed decontamination/disposal method is adequate to perform the test. The Engineering Report will contain a detailed worker safety plan, the results of the Bench Scale Treatability Study, additional specification of these methods, as required, for decontamination and demolition, independent contractor qualifications and experience, and the identity of the disposal facilities which will receive the waste.

All tasks will be undertaken in strict accordance with worker Health and Safety standards provided in OSHA 1910 specifically:

- All workers will have attended an OSHA 24-hour HAZWOPER class provided by a qualified instructor or other source, and be fully acquainted with the facilities contingency plan.
- All workers involved in closure will wear appropriate levels of personal protective equipment (PPE), including, but not limited to, dermal and inhalation protection. The on-site Safety coordinator will determine the level of protection required for each task.
- An exclusion zone will be established around each work site so that the on-site Safety Officer and on-site Coordinator control access to and from this area. All workers will be required to enter and leave the work area via designated corridors.
- All wash waters generated from worker decontamination will be collected, sampled and analyzed, and, if appropriate, managed as a hazardous waste.

9.5.3 In order to affect a “clean closure” of this facility, the methods by which decontamination and removal of contaminated debris are accomplished will be largely dictated by the condition of the facility at the time of closure. However, selection of the most comprehensive, and cost-effective method by which closure will be accomplished will follow the guidelines established in appropriate and relevant EPA documents and guidance. The details of the closure plan will be dictated by the most cost effective, appropriate, and relevant technologies at the time of closure. The methods for decontamination of structures and the procedures for selection of methods as provided in the closure plan are supported by the referenced AP guidance document¹.

- Reduce inventory of waste as practical.
- Empty drums which are structurally sound will be cleaned by scraping both the inside and outside of the drum. These drums will then be shipped off-site for proper disposal, or

Clean Earth of Alabama, Inc. – ALD981020894

may be used to containerize contaminated soils and debris generated at closure. The material scraped from these drums will be collected and managed as a hazardous waste. Structurally unsound drums will be shipped off-site for proper disposal.

- All piping and pipe fittings in hazardous waste service will be cleaned to below method detection limits. A treatability study will be performed at the time of closure to confirm that the selected method of decontaminating the tank, TSP (trisodium phosphate) rinse is appropriate. Based on current information, the preferred method EWS Alabama, Inc. intends to use is a high-pressure water rinse followed by a rinse with a TSP and a final high-pressure water rinse. The wash waters will be collected, sampled and analyzed, and shipped offsite for appropriate disposal.
- Alternatively, a solvent washing method may be used if the TSP method described above is ineffective in decontaminating the piping and pipefitting in hazardous waste service. The solvent used to decontaminate this equipment will be collected and managed as a hazardous waste.
- A qualified and experienced contractor will perform the decontamination of tanks in hazardous waste service. The contractor will supply certification of closure in accordance with ADEM approved methods. Residue generated from this task will be managed as hazardous waste if indicated by TCLP analysis of samples.
- The decontamination of vessels will be accomplished by either TSP rinse or solvent wash method. The interior of the tanks will be visually clean prior to collection of wipe samples from each tank.
- To confirm that the tanks have been sufficiently decontaminated, wipe samples will be collected from inside the tanks. From the individual tanks, three wipes will be collected from the tank walls at different strata along the tank walls and one sample collected from the floor of the tank. Each of the four samples collected from each tank will be collected from a 10cm x 10cm area using laboratory cleaned gauze pads. These four samples will be composited and the composited samples from each tank will be submitted for analysis for Appendix VII compounds.

¹ EPA Document [Guide for Decontaminating Buildings, Structures, and Equipment at Superfund Sites EPA/600/2-85/028](#)

9.5.4 Decontamination of secondary containment structures will likely be necessary. The extent of the contamination will be determined from visual observations of these areas and analyses of a representative number of wipe and bulk/chip samples. The proposed method for decontaminating the structures is scarification. This method involves the removal of thin layers (i.e.; ~1/4 inch) of concrete from the surface areas where spills have caused staining. The resulting debris from this operation will be collected and analyzed for TCLP parameters and managed appropriately. Alternatively, solvent washing, or Hydroblasting/water washing may be performed. Each of these methods will be tested during the treatability study. Selection will be made on the basis primarily of effectiveness and residue/waste generation will be subject to ADEM approval. Economic considerations will also be a factor but may not be the deciding factor in the selection of a method(s), or any alternative methods. The resulting waste waters or used solvent will be collected and managed appropriately.

Demolition of the secondary containment system will only be necessary if decontamination procedures given above are ineffective in rendering these structures free from contamination. Decontamination procedures will be judged ineffective and demolition required if contaminated soil is found beneath the concrete. Soil samples will be collected from beneath the concrete if evidence of migration has been found (i.e.; ½ inch penetration into the concrete and/or if

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cracks in the concrete have occurred). Should such action be necessary, the structure will be demolished. The debris from this activity will be sent to a waste management facility for disposition. Disposal of all other closure debris will be collected, sampled and analyzed for TCLP parameters and managed appropriately.

9.5.5 All visibly contaminated soils will be excavated and subjected to a TCLP analysis and managed appropriately. Following removal of all visibly contaminated soils, a grid will be constructed on each wall and on the floor of the excavation pit. A minimum of four grab samples of approximately 150 grams each will be collected at each grid node. The grab samples from each wall and the floor will then be composited to create five separate samples representing each of the five surface areas. Each of these five samples will be submitted to a qualified analytical laboratory and analyzed for TOC, TOX, and selected organic compounds. If analysis indicates remaining contamination above background, an additional 1-foot of soil will be excavated on each of the offending surfaces of the pit (i.e.; walls and floor). When this excavation is completed, more samples will be collected as previously described and submitted for analysis. This process will be repeated until analytical verification is obtained indicating that the site is free of contaminants. All analyses will be performed in accordance with appropriate SW-846 protocols and procedures by a qualified analytical laboratory. The contaminated soils excavated from this site will be subjected to TCLP analysis and managed appropriately. Excavated sites will be back-filled with clean soils procured from off-site locations.

9.5.6 Following the completion of the above tasks, soil samples will be collected around the perimeter of the production and storage areas of the facility and submitted for analysis to verify clean closure of the site. The samples will be collected as close to the regulated units as possible to the edge of the buildings and structures and a minimum of 10 samples will be collected from each area. The sample locations will be selected such that the areas of most probable contamination are included in the sampling strategy. One background soil sample will be collected from an offsite location that is topographically up gradient of the site. This off-site location will not be more than 100 yards from the property boundary, if practical (i.e.; not within roadways or roadway drainage ways). This background sample and those collected from the storage and process areas will be analyzed for Appendix VII constituents. If any on-site samples indicate Appendix VIII constituent levels above background, additional soil will be excavated until clean soil (i.e.; < background is encountered). Prior to back filling the excavation pit with clean soil, two additional samples will be collected from the immediate vicinity of this “hot spot”. One of these samples will include a surface soil sample collected three feet topographically down gradient from the original sample point and another sample will be collected from two feet beneath the pit. These samples will be analyzed for the parameters that were identified as being present in the original soil sample. This procedure will be repeated until analytical results are below background levels.

The data from sample analyses will be reviewed and any additional excavation/decontamination warranted will be performed. If warranted, additional samples will be collected and submitted for analysis. This procedure will be repeated until the standards for a RCRA clean closure have been satisfied.

All data and details of closure will be reviewed by a qualified, registered professional engineer. A certification of clean closure will be submitted in accordance with regulatory requirements.

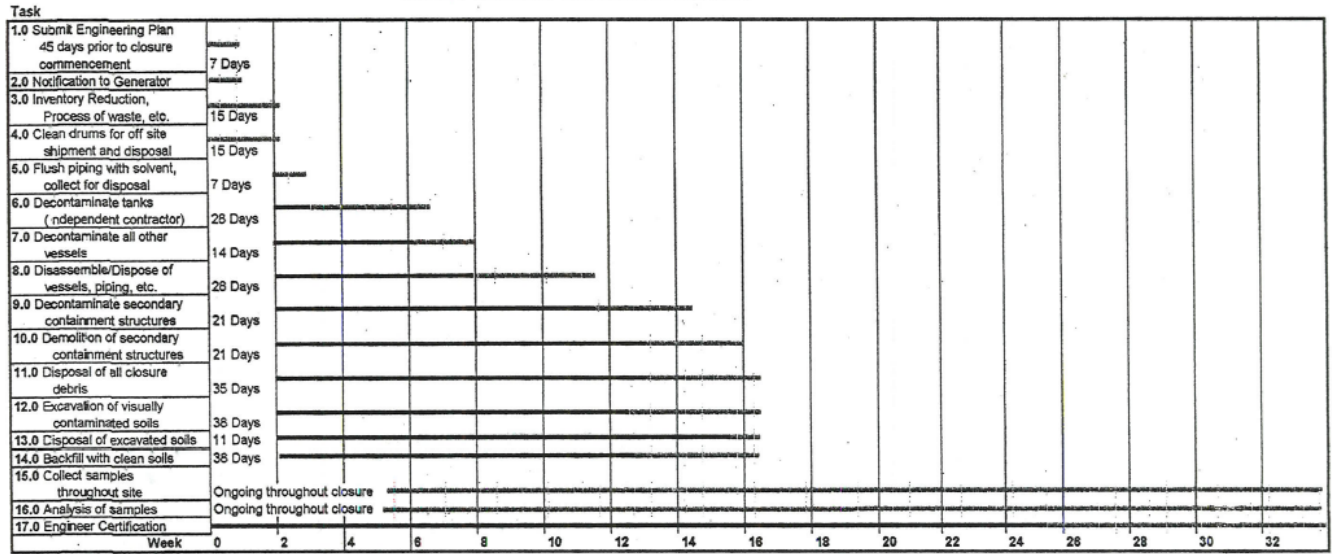
9.6 Schedule for Closure

Figure 2 presents the estimated schedule for final facility closure. Upon determination that closure is to take place, the facility will submit a final engineering plan to ADEM. The engineering plan will detail actual closure procedures for approval, and will be submitted to ADEM 45 days prior to the planned closure date. Generators will be notified of the imminent closure date and will be directed to seek other sources of waste management.

Clean Earth of Alabama, Inc. – ALD981020894

9.6.1 Figure 2 - Closure Schedule

Figure 2
Closure Schedule at 2 Week Graduation



Clean Earth of Alabama, Inc. – ALD981020894

9.8 Appendix II – Closure Cost Estimates



ROBBIE D. WOOD, INC.

P.O. Box 125
DOLOMITE, AL 35061
PHONE 205-744-8440

INVOICE 1142817

Date 06/06/2013

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FIGLAL
EWS OF ALABAMA, LLC
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

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LSGRIN
LONE STAR
3301 S COUNTY RD 150 WEST
GREENCASTLE, IN 46135

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EWS
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

SHIPPING DATE 05/26/2013
SHIPPER'S REF NO. 001954814GBF
ORDERED BY
DRIVER NAME CRE
TRUCK NO. 391
TRAILER NO. 1446V
BOX NO.
LOAD NO.

P.O.#/PAY#

DESCRIPTION	WEIGHT	MILES	RATE	CHARGES
HAZ WASTE	0.0	1.0000	1625.0000	1625.00
FUEL SURCHARGE	Percent	1625.0000	31.0000	503.75
<i>tanker</i>				
THIS BILL IS PAST DUE ON	07/06/2013		PLEASE PAY THIS AMOUNT	\$2,128.75

RECEIVED JUN 07 2013

ICC REGULATIONS REQUIRE PAYMENT WITHIN 15 DAYS

Please DO NOT short pay this Invoice. Call(205-744-8440 ext 17) for a corrected Invoice.

Clean Earth of Alabama, Inc. – ALD981020894



ROBBIE D. WOOD, INC.

P.O. Box 125
DOLOMITE, AL 35061
PHONE 205-744-8440

INVOICE 1142817

Date 06/06/2013


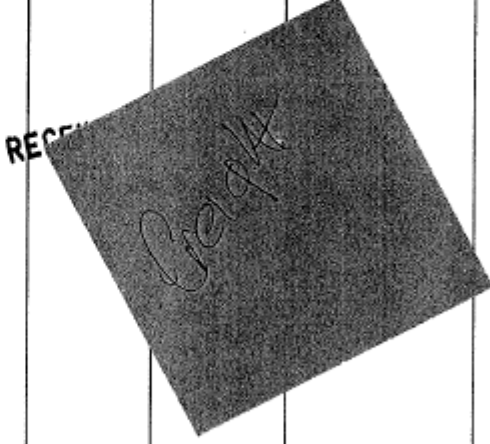
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EWS OF ALABAMA,LLC
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

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LSGRIN
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3301 S COUNTY RD 150 WEST
GREENCASTLE, IN 46135

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EWS
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

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HAZ. WASTE	0.0	1.0000	1625.0000	1625.00
FUEL SURCHARGE	Percent	1625.0000	31.0000	503.75
				
				
THIS BILL IS PAST DUE ON	07/06/2013		PLEASE PAY THIS AMOUNT	\$2,128.75

ICC REGULATIONS REQUIRE PAYMENT WITHIN 15 DAYS

Please DO NOT short pay this Invoice. Call(205-744-8440 ext 17) for a corrected Invoice.



Buzzi Unicem USA

INVOICE NUMBER

78261

Buzzi Unicem USA
Greencastle WDF Facility
3301 S. Co. Rd. 150 W.
P.O. Box 486
Greencastle, IN 46135
(765) 653-8816

BILL TO:

EWS ALABAMA INC
402 WEBSTER CHAPEL ROAD
GLENCOE, AL 35905

Attention: Accounts Payable

[Handwritten signature]

Invoice Date: 01/11/13

JAN 21 2013

Thermal Destruction Services at Greencastle WDF Facility

Customer: EWS ALABAMA INC
Profile No: LS02596
Manifest No: 1954211
Weight: 39180 Pounds
Specific Gravity: 1.

Reference: 1954211

cost / lb for fuel

<u>Item</u>	<u>Lab Measurement</u>	<u>SurCharge</u>	<u>Total</u>
Load Base Price	\$0.0100	\$0.00	\$391.80
Minimum Load Fee		\$0.00	\$0.00
BTU's per Pound	9,200	\$0.000	\$0.00
Moisture	26.90%	\$0.000	\$0.00
Chlorine	1.40%	\$0.000	\$0.00
Suspended Solids	12.00%	\$0.000	\$0.00
Heel Removal Fee		\$0.00	\$0.00
Rejection Fee			\$0.00
Additional Charges			\$0.00
Multiple Manifest Fee			\$0.00

Terms: Net 30 days

Please Pay This Amount:

\$391.80

Comments:

Partial rejection - 260 gallons/2140 lbs approx

REMIT TO:

Buzzi Unicem USA
Greencastle - Alt. Fuels
23121 Network Place
Chicago, IL 60673-1231

SHIPPING DOCUMENTS AND CERTIFICATE OF DESTRUCTION/REUSE ENCLOSED. PLEASE FORWARD TO PROPER AUTHORITY.

A.R. Paquette & Co., Inc.

INVOICE PHONE: 380-730-1978 1400 E Int'l Speedway Blvd **INVOICE No.**
 FAX: 380-738-2810 De Land, FL 32724 **125839**

SHIPPING DATE	12/29/2012	BILLING DATE	01/08/2013	PO #		B/L #	
SHIPPER ORIGIN L 1) EWS - Glencoe, AL 12/29/2012				CONSIGNEE - DESTINATION U 2) Safety Kleen Solvent Center - Smithfield, KY 01/02/2013			
CUSTOMER-BILL TO EWS Alabama INC. 402 Webster Chapel Rd Glencoe, AL 35905							
QUANTITY	DESCRIPTION	WEIGHT	QUANTITY	RATE	AMOUNT		
1 TL	Hazardous Waste		410Mi	2.150/M	881.50		
	Fuel Surcharge		410Mi	0.580/M	237.80		
Manifest 002856803SKS							
<i>TRANS TO SAFETY KLEEN SOLIDS 8060MS</i>							
THIS INVOICE DUE AND PAYABLE UPON RECEIPT					TOTAL	1119.30	

CUSTOMER:

[11521]
 EWS Alabama INC.
 402 Webster Chapel Rd
 Glencoe, AL 35905

---- PLEASE RETURN THIS PORTION WITH YOUR PAYMENT ----

LOAD NUMBER: 125839

INVOICE NUMBER: 125839

AMOUNT DUE: 1119.30

CREDIT TAKEN: _____


DATE PAID: _____

AMOUNT PAID: _____

MAIL PAYMENT TO:

NOTICE OF ASSIGNMENT
 THIS INVOICE HAS BEEN ASSIGNED TO, AND
 MUST BE PAID DIRECTLY TO:
 ADVANCE BUSINESS CAPITAL LLC
 P.O. Box 810028
 Dallas, TX 75281-0028
 CLAIMS OR OFFSETS SHOULD BE DIRECTED TO 888-414-8600

Clean Earth of Alabama, Inc. – ALD981020894



SAFETY-KLEEN SYSTEMS, INC.
2600 North Central Expressway Ste 400
Richardson, TX 75080
DURING 12:00 PM - 5:00 PM
TEL: 972.782.9000

INVOICE Page 1 of 2

Billing Account #	Service Account #	Invoice #	Invoice Date
609536	609536	59420423	11/09/12

Billing Address
EWS ALABAMA INC.
402 WEBSTERS CHAPEL RD
GLENCOE AL 35905-7150

Service Address
EWS ALABAMA INC.
402 WEBSTERS CHAPEL RD
GLENCOE AL 35905-7150

Branch Location
RC SMITHFIELD

Terms
Net 30

For Questions Call:

Service Date
11/07/12

PO Number	Department #	Department	Manifest #	Tax Status #
NONE				

QUANTITY	PART#	TERM	SERIAL/PROFILE #	UNIT PRICE	UOM	SALES TAX	TOTAL
647.5	1044417	24		\$0.1000	EA	\$0.00	\$64.75
KY WASTE FEE SOLID 32375lbs @ \$0.002/lb.							
1	876785	8	40254256	\$445.2000	CBX	\$0.00	\$445.20
WATSE FLAMMABLE SLUDGES							

PO Number	Department #	Department	Manifest #	Tax Status #
NONE	36	55 GAL SOLID	002856799SKS	

QUANTITY	PART#	TERM	SERIAL/PROFILE #	UNIT PRICE	UOM	SALES TAX	TOTAL
72	875060	8	2441573	\$111.3000	DR	\$0.00	\$8,013.60
TSDf DISPERABLE SLUDGE & SOLIDS							

only

NOV 28 2012

Please be advised delinquent payments may result in a Late Payment Charge of \$25.

 SAFETY-KLEEN SYSTEMS, INC.
2600 North Central Expressway Ste 400
Richardson, TX 75080

Billing Account #	Service Account #	Invoice #	Invoice Date
609536	609536	59420423	11/09/12
Date Due		Amount Due	
12/09/12		\$9,247.55	

PLEASE RETURN THIS PORTION WITH PAYMENT.
MAKE ANY ADDRESS CORRECTIONS BELOW.

000594204230000609536400009247556

000104 1
EWS ALABAMA INC.
402 WEBSTERS CHAPEL RD
GLENCOE AL 35905-7150

SAFETY-KLEEN SYSTEMS, INC.
PO BOX 650509
DALLAS, TX 75265-0509



Clean Earth of Alabama, Inc. – ALD981020894



AES Environmental LLC
 2100 Georgetowne Drive
 Suite 303
 Sewickley, PA 15143
 (724) 933-4100

Invoice Number: AES-152744
 Invoice Date: 02/04/2014
 Purchase Order #: _

Generator: EWS Alabama, Inc.
 402 Webster Chapel Road
 Glencoe, AL 35905

Work Order # 110166 T&D CC
 Disposal

Date	Description	Quantity	Unit	Unit Price	Line Price
1/27/2014	002071874GBF-1 / MGT-39614 / DEBRIS W/ METALS - BULK / Rolloff/Dump	16.94	Ton	\$76.00	\$1,287.44

Work Order Subtotal \$1,287.44
 Hazardous Waste Disposal Tax \$33.88
 Environmental Assessment Fee \$109.43
Invoice Total \$1,430.75

Remit To: AES Environmental LLC
 2100 Georgetowne Drive
 Suite 303
 Sewickley, PA 15143
 (724) 933-4100

Clean Earth of Alabama, Inc. – ALD981020894



AES Environmental LLC
 2100 Georgetowne Drive
 Suite 303
 Sewickley, PA 15143
 (724) 933-4100

Invoice Number: AES-152407
 Invoice Date: 01/24/2014
 Purchase Order #: _

Generator: EWS Alabama, Inc.
 402 Webster Chapel Road
 Glencoe, AL 35905

Work Order # 109580 T&D CC

Disposal

Date	Description	Quantity	Unit	Unit Price	Line Price
1/9/2014	002071839GBF-1 / MGT-45752 / CAUSTIC LIQUID - BULK / Vac Trailer/Tank Truck	5,000.00	Gallon	\$0.63	\$3,150.00

Work Order Subtotal	\$3,150.00
Hazardous Waste Disposal Tax	\$232.92
Environmental Assessment Fee	\$267.75
Invoice Total	\$3,650.67

Remit To: AES Environmental LLC
 2100 Georgetowne Drive
 Suite 303
 Sewickley, PA 15143
 (724) 933-4100

Printed

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August 21, 2013

Pat Sullivan
EWS
402 Webster Chapel Rd
Glencoe, Alabama 35905

Re: building & structure closure cleaning

Dear Pat,

Environmental & Recycling Solutions (ERS) is pleased to provide EWS with the following proposal for cleaning of your facility in Glencoe, Alabama. This quote is for your facility closure plan. ERS will provide all equipment and personnel required to conduct this service within all applicable local, state and federal guidelines.

Rates

	Floor surface area (\$0.40/sqft)	Wall surface area (\$1.65/sqft)	Total cost
Tank Farm	1,800 sqft	464sqft	\$ 1,485.60
Drum Storage	21,550 sqft	670 sqft	\$ 9,725.50
Solids Building	10,571 sqft	2,370 sqft	\$ 8,138.90
Bulk Storage area	3,600 sqft	0	\$ 1,440.00
Stabilization Building	10,440 sqft	1,172 sqft	<u>\$ 6,109.80</u>
			\$26,899.80

EWS will provide access to all areas needed to perform work and a water source. EWS will provide any information requested on what materials are in the facility. Should the nature of the waste material change it is the responsibility of the generator to inform ERS of this change.

Payment terms are net thirty (30).

Should you have any questions concerning this quotation please contact me @ 334-737-3866.

We thank you for the consideration, and hope to hear from you soon.

Regards,
David Chunn
ERS
1902 Market Street
Opelika, Alabama 36801
Ph: 334-737-3866
Cell: 205-616-2436
Fax: 334-737-3868

10 Containment

10.1 Building #1

Measurements:

$$152 \text{ ft.} + 120 \text{ ft.} = 272 \text{ ft.}^2 \times 60 \text{ ft.} = 16,320 \text{ ft.}^2$$

$$209 \text{ ft.} + 125 \text{ ft.} = 334 \text{ ft.}^2 \times 60 \text{ ft.} = 20,040 \text{ ft.}^2$$

$$\text{Total} = 36,360 \text{ ft.}^2$$

$$\text{Lowest Wall Height} - 4'' = 0.33 \text{ ft.}$$

$$\text{Containment Volume} = 36,360 \text{ ft.}^2 \times 0.33 \text{ ft.} = 11,998.8 \text{ ft.}^3 = 89,757 \text{ gallons}^*$$

$$\text{Current Displacement of Containers} = 1,840 \text{ Containers} \times 55\text{-gallon equivalent} = 101,200 \text{ gallons}$$

$$10\% \text{ of } 101,200 = 10,120 \text{ gallons}$$

10,120 gallons **does not** exceed containment capacity of 89,757 gallons

10.2 Building #4

$$\text{Area 1} = 50 \times 60 = 3,000 \text{ ft.}^2 \text{ (existing)}$$

$$\text{Area 2} = 71 \text{ ft. } 9 \text{ inches} \times 34 \text{ ft.} = 2,439.5 \text{ ft.}^2 \text{ (existing)} \quad 10 \text{ ft.} \times 45 \text{ ft.} = 450 \text{ ft.}^2$$

$$10 \text{ ft.} \times 45 \text{ ft.} = 450 \text{ ft.}^2$$

$$10 \text{ ft.} \times 71.75 \text{ ft.} = 717.5 \text{ ft.}^2$$

$$\text{Total} = 7,054.5 \text{ ft.}^2$$

$$7,054.5 \text{ ft.}^2 \times 0.70 \text{ ft. (wall height average taken from existing measurements)} = 4,938.15 \text{ ft.}^3$$

$$\text{Containment volume} = 4,938.15 \text{ ft.}^3 = 36,939 \text{ gallons}^*$$

$$\text{New Displacement of Containers} = 420 \text{ containers} \times 55 \text{ gallons} = 23,100 \text{ gallons}$$

$$10\% \text{ of } 23,100 \text{ gallons} = 2,310 \text{ gallons}$$

2,310 gallons **does not** exceed containment capacity of 36,939 gallons

10.3 Building #2

Existing Structure: 72.67 ft. x 145 ft. = 10,537.15 ft.² Containment

Area = 72.67 ft. x 145 ft. = 10,537.15 ft.²

10,537.15 ft.² x 0.17 (berm height) = 1,791.31ft³

Containment Volume = 1,791.31 ft.³ = 13,397 gallons*

New Container Displacement = 1,780 (55-gal equivalent) = 97,900 gallons

10% of 97,900 gallons = 9,790 gallons

9,790 gallons does not exceed containment capacity of 13,397 gallons

10.4 Tank Farm

Small Area = 12.5 ft. x 12.25 ft. = 153.125 ft.² Large Area = 29 ft. x 59 ft. = 1,711 ft.²

Total Area = 1,864.125ft² x 3ft. = 5,592.375 ft.³

Containment Volume = 5,592.375 ft.³ = 41,833 gallons*

Container Displacement = 15,000 gallons x 6 + 500 gal. Diesel tank + 500 gal. Gasoline tank = 91,000 gallons 10% of 91,000 gallons = 9,100 gallons

9,100 gallons does not exceed containment capacity of 41,833 gallons

10.5 Building #3

Containment Area = 60 ft. x 60 ft. = 3,600 ft.²

3,600 ft.² x 0.5 ft. = 1,800 ft.³

Containment Volume = 1,800 ft.³ = 13,464 gallons*

Container Displacement = (960 Drums @ 55 gallons) or 12 bulk containers = 52,800 gallons 10% of 52,800 gallons = 5,280 gallons

5,280 gallons does not exceed containment capacity of 13,464 gallons

*** Utilizing the following online conversion program:**

<http://www.metric-conversions.org/volume/cubic-feet-to-us-liquid-gallons.htm?val=5999>

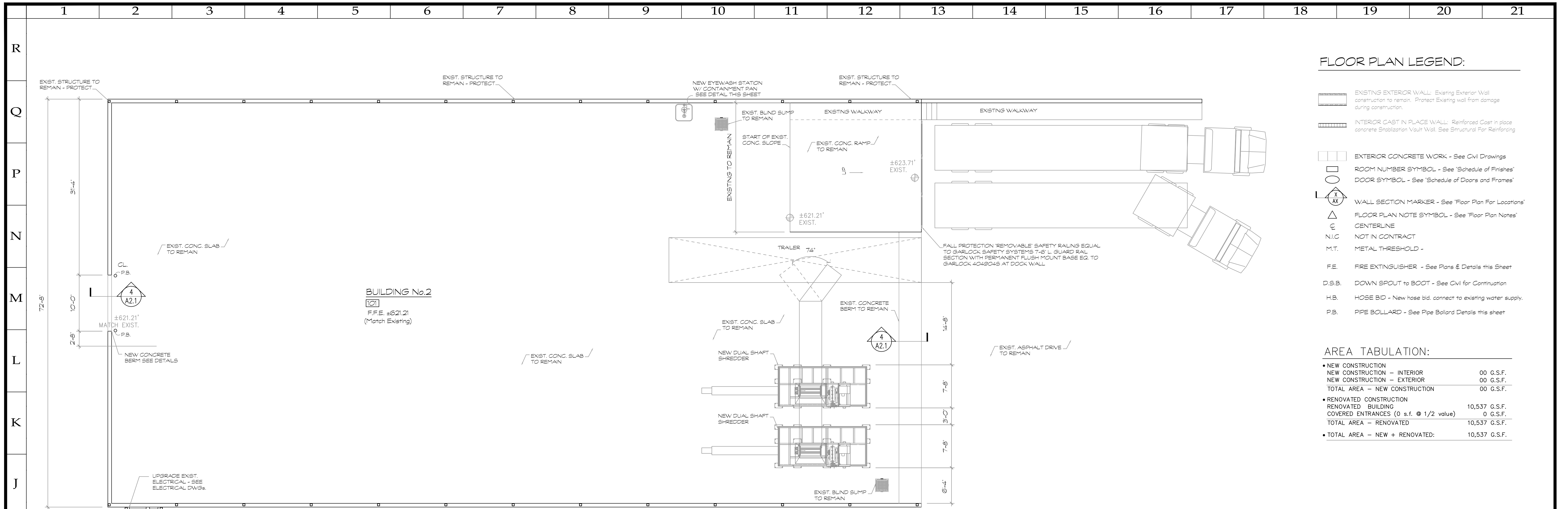
11 Proposed Changes

11.1 Building #4

A Class I MOD of the permit was approved on 5.31.2019 to relocate the shredder from Building #4 and relocate it into Building #2.

11.2 Building #2

Upon approval of a Class II MOD an additional shredder will be placed into building #2. Once approved the two units will be stationed side by side. Then the processed materials will be conveyed directly into an end dump trailer stationed within the containment of building #2. Once the trailer is full it will be stationed within the containment of Building #3 or sent to a 10-Day transfer facility until delivery to a permitted facility for final treatment/disposal.



FLOOR PLAN LEGEND:

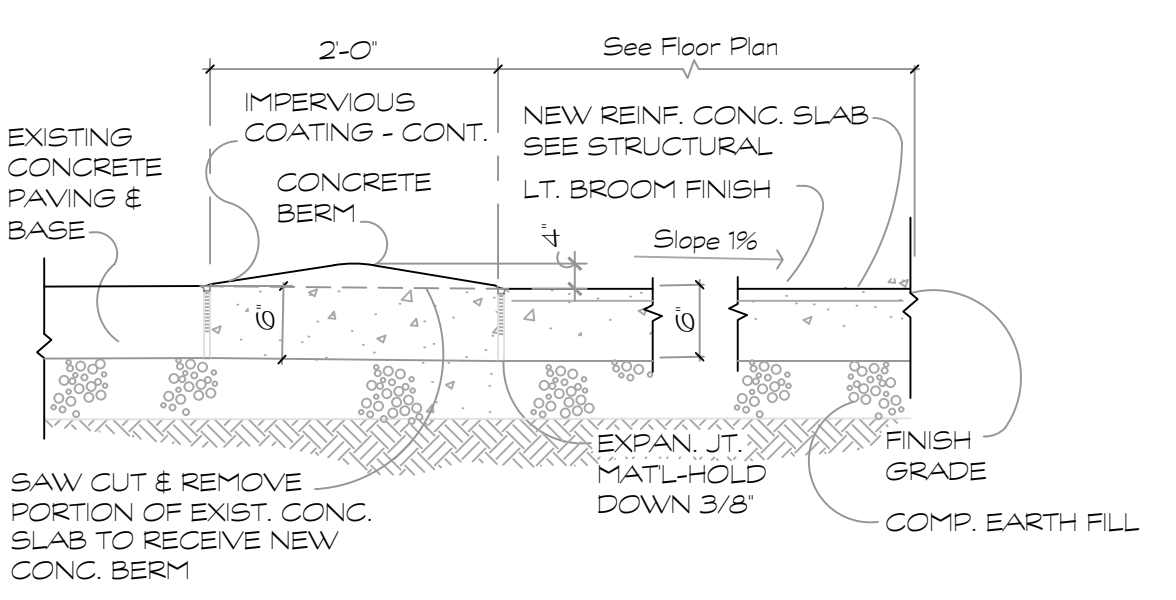
- EXISTING EXTERIOR WALL: Existing Exterior Wall construction to remain. Protect Existing wall from damage during construction.
- INTERIOR CAST-IN-PLACE WALLS: Reinforced Cast in place concrete Strablation Vair Wall. See Structural For Reinforcing
- EXTERIOR CONCRETE WORK - See Civil Drawings
- ROOM NUMBER SYMBOL - See 'Schedule of Finishes'
- DOOR SYMBOL - See 'Schedule of Doors and Frames'
- WALL SECTION MARKER - See 'Floor Plan For Locations'
- FLOOR PLAN NOTE SYMBOL - See 'Floor Plan Notes'
- CENTERLINE
- NOT IN CONTRACT
- METAL THRESHOLD -
- F.E. FIRE EXTINGUISHER - See Plans & Details this Sheet
- D.S.B. DOWN SPOUT to BOOT - See Civil for Continuation
- H.B. HOSE BID - New hose bid. connect to existing water supply.
- P.B. PIPE BOLLARD - See Pipe Bollard Details this sheet

AREA TABULATION:

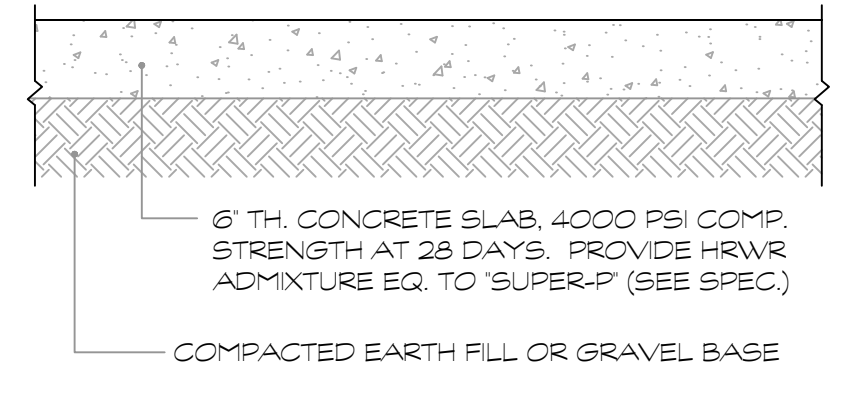
• NEW CONSTRUCTION	
NEW CONSTRUCTION - INTERIOR	00 G.S.F.
NEW CONSTRUCTION - EXTERIOR	00 G.S.F.
TOTAL AREA - NEW CONSTRUCTION	00 G.S.F.
• RENOVATED CONSTRUCTION	
RENOVATED BUILDING	10,537 G.S.F.
COVERED ENTRANCES (0 s.f. @ 1/2 value)	0 G.S.F.
TOTAL AREA - RENOVATED	10,537 G.S.F.
• TOTAL AREA - NEW + RENOVATED:	10,537 G.S.F.

FLOOR PLAN - BUILDING No. 2

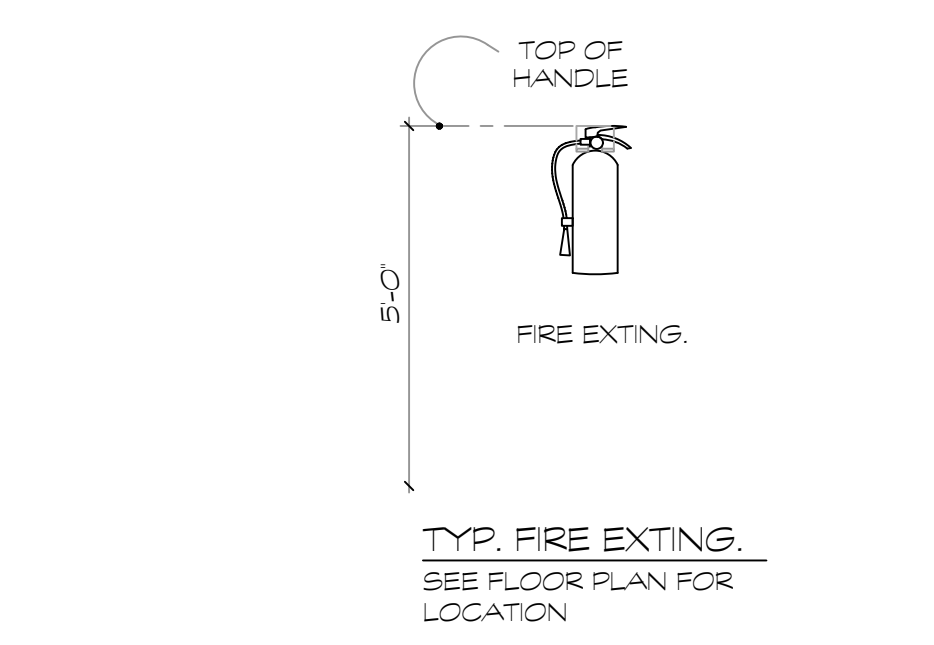
SCALE: 1/8" = 1'-0"



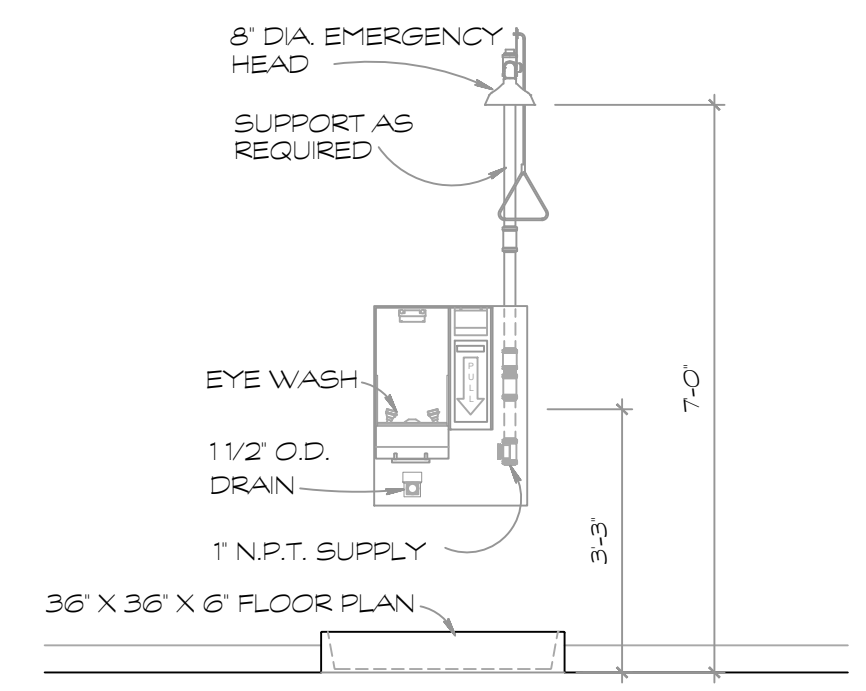
4 DETAIL at TYP. CONCRETE BERM
A2.1 at EXISTING PAVING SCALE: 3/4" = 1'-0"



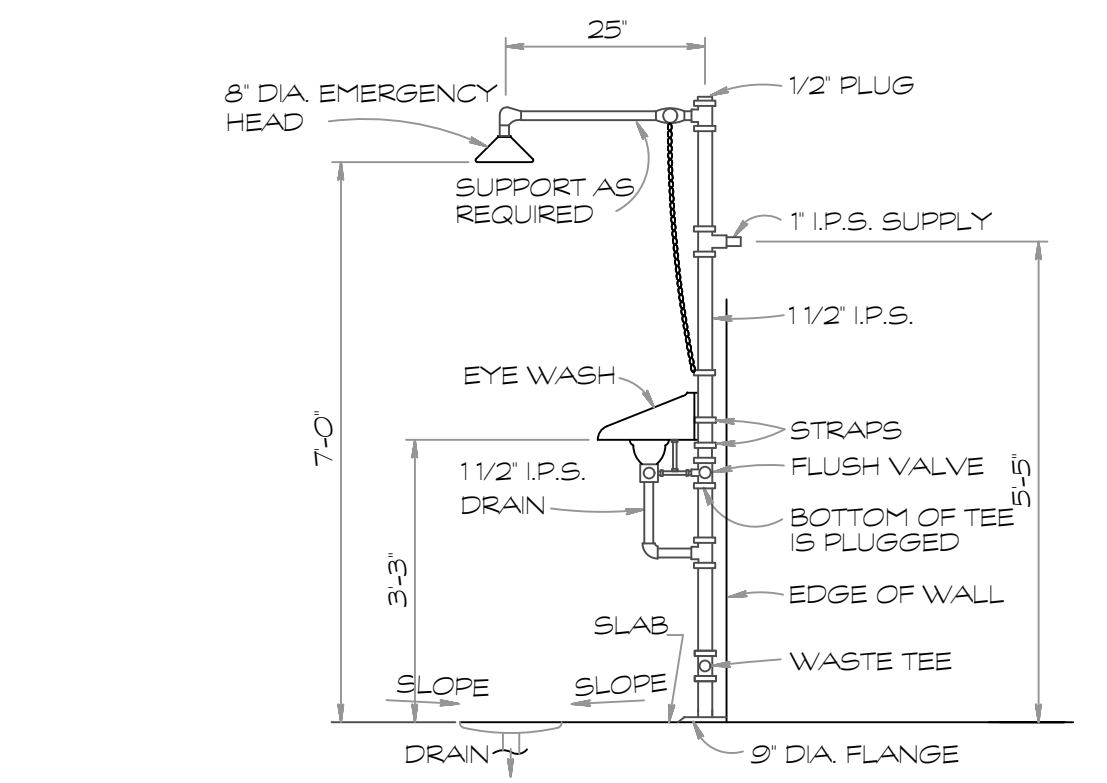
2 TYP. SECTION @ CONCRETE
A2.1 PAD SCALE: N.T.S.



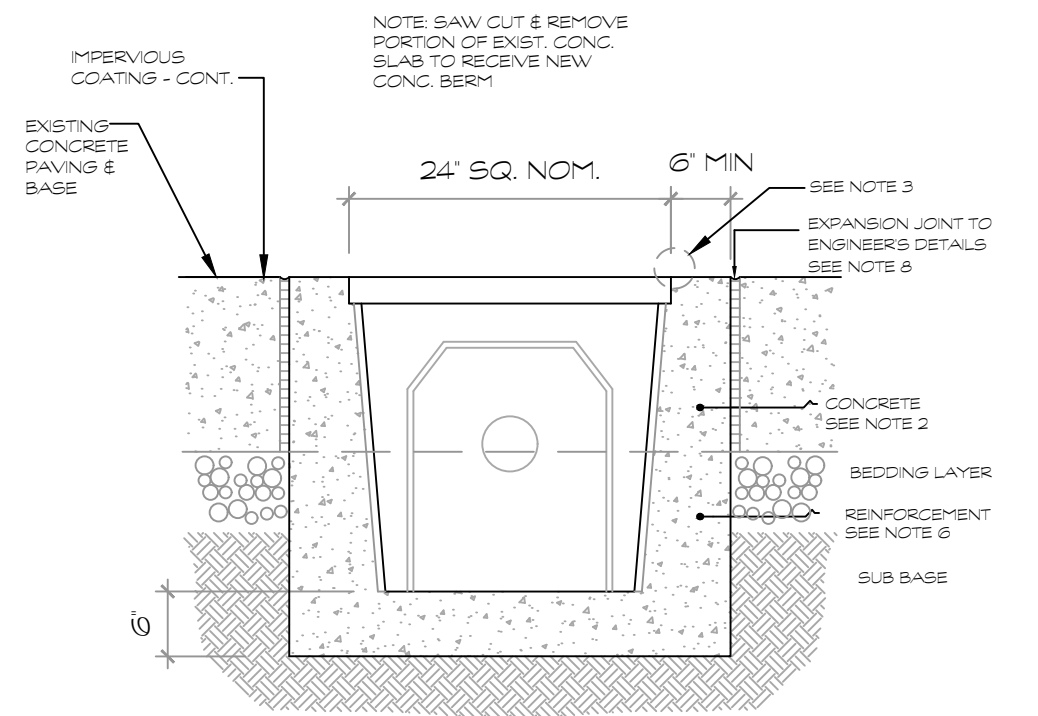
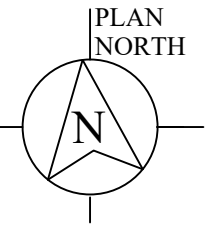
1 TYP. MOUNTING HEIGHTS
SCALE: 3/8" = 1'-0"



2 WALL MOUNT - EMERGENCY SHOWER & EYE WASH DETAIL
SCALE: N.T.S. SEE FLOOR PLAN FOR LOCATION

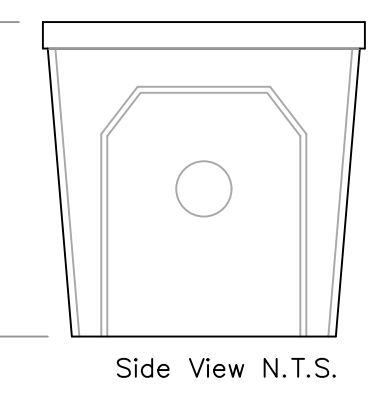
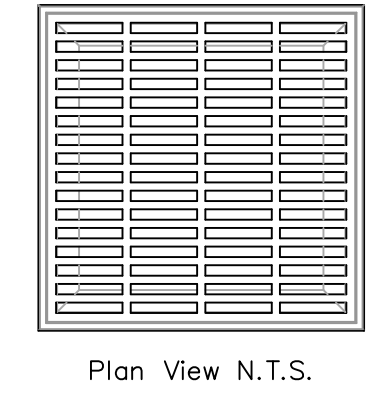


1 EMERGENCY SHOWER & EYE WASH DETAIL
N.T.S.



- NOTES:**
- It is necessary to ensure the minimum dimensions shown are suitable for the existing ground conditions. Engineering advice may be required.
 - A minimum concrete strength of 3000 PSI is recommended. The concrete should be vibrated to eliminate air pockets.
 - The finished level of the cap/slot surround must be approx. 1/8" above the top of the catch basin edge.
 - Refer to manufacturer's latest installation instructions for complete details.
 - Concrete base thickness should match the slab thickness.
 - Rebar or steel mesh reinforcement may be required. Engineering advice may be required.
 - Outlet cap recommended for channel-sump box interface. (Factory or field core drill necessary)
 - Expansion and crack control joints are recommended to protect the catch basin and the concrete surround. Engineering advice may be required.
- The sump box shall be made from polymer concrete with a grey iron frame and grate equal to ACO Polymer Products, Inc., Chardon, Oh.
- The sump box will be used in conjunction with 4"/8"/12" DRAIN trench drain (equal to ACO) and shall accept trench drain on all sides as shown above.
- The sump box shall be 23 in. (582mm) maximum inside length with a 23 in. (582mm) maximum inside width. Sump box depth is 25.7 in. (652mm). The overall height is 26.8 in. (680mm).
- The complete sump box and trench drainage system shall be equal to ACO Polymer Products, Inc. Any deviation or partial system design and/or improper installation will void any and all warranties provided by manufacturer.
- Sump box shall withstand loading to Load Class E (DIN 19 580). Grate shall be coordinated with contractor, manufacturer and architect. Sump box, Trench channel and grate shall be independently certified to meet the specified DIN 19580 load class.
- Polymer Concrete shall have material properties of: compressive strength range between 14,000-14,500 psi; flexural strength between 3600-4500 psi; tensile strength of 1500 psi. The material water absorption rate shall not exceed 0.1% by weight and shall be resistant to prolonged salt exposure, repetitive frost cycles and chemically resistant to dilute acids and alkalis.
- The system shall be installed in accordance with the manufacturer's instructions and recommendations.

1 DETAIL at TYP. SUMP
A2.1 SCALE: 3/4" = 1'-0"



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info@cdpdesign.net

FLOOR PLAN & DETAILS

RENOVATIONS to BUILDING No.2
CLEAN EARTH of ALABAMA, INC
GLENCOE, ALABAMA

	PROJECT STATUS REVIEW	REVISED 04/11/2019
	PROJECT NO. 19020	
DRAWN DEP	DRAWING NO. A2.1	
CHECKED CJD		
DATE 03/15/19		2 OF 2

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