EQ Alabama, Inc. (EQ Alabama)
Sulligent, Alabama 35055
EPA I.D. Number ALD 983 177 015

FACT SHEET

A draft modification to an Alabama Hazardous Waste Management and Minimization Act (AHWMMA) permit modification has been prepared for EQ Alabama facility. This hazardous waste facility is located in Sulligent, 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 EQ Alabama's ability to comply with the hazardous waste management requirements of the AHWMMA, as amended. EQ Alabama 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 issue EQ Alabama a permit to operate a container storage building, bulking pad and roll off pad which are used to store and treat hazardous wastes.

ADEM Admin. Code R. 335-14-8-.08(6) requires that the public be given a 45-day comment period for each draft permit. The comment period will begin on July 20, 2016 which is the date of publication of the public notice in major local newspaper(s) of general circulation, and will end on September 6, 2016. 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

EQ Alabama is a facility that accepts hazardous wastes from off-site generators and stores the wastes until they are sent to an off-site disposal facility. EQ Alabama also performs the following types of bulking: 1) hazardous wastes with no free liquids that have the same waste code from drums into roll-off containers, and 2) liquid hazardous wastes of like waste codes for trans-shipment to an off-site facility. The current permit contains provisions for proper operation of the container storage building, the bulking pad, and the roll-off pad, as well as post-closure care and corrective action that may be necessary upon closure of the facility.

Additional provisions have been included in the permit as a result of the changes made to AHWMMA 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 Rule 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 EQ Alabama has been completed and SWMUs have been identified. All SWMUs are recommended to continue the current operation as required by the permit.

VI. TECHNICAL CONTACT

Charmaine Roche
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) 271-7763

DRAFT

ADEM
Alabama Department of Environmental Management

HAZARDOUS WASTE FACILITY PERMIT

PERMITTEE:	**EQ Alabama, Inc.**
ADDRESS:	**51328 Highway 17** **Sulligent, AL 35586**
EPA ID/PERMIT NUMBER:	**ALD 983 177 015**
UNITS PERMITTED:	**Container Storage Building** **Bulking Pad** **Roll-off Pad** **(Storage and Treatment in Containers)**
ISSUANCE DATE:	**XXXXXXXX, 2016**
EXPIRATION DATE:	**XXXXXXXX, 2026**

This Permit is issued pursuant with the Code of Alabama 1975, §§ 22-30-1-et. seq., as amended, and regulations adopted thereunder and the Hazardous Wastes Management and Minimization Act and in accordance with the plans and specifications and applications filed with the Department subject to the conditions appended hereto, all of which are considered a part of this Permit. This Permit shall be subject to all applicable laws of the State of Alabama, rules and regulations and orders of the Department of Environmental Management and shall be effective from the date of issuance.

_____
Alabama Department of Environmental Management

DRAFT

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
HAZARDOUS WASTE PERMIT

Permittee: Permit Number: ALD 983 177 015
OWNER: Identification Number: ALD 983 177 015

EQ Alabama, Inc.
51328 Highway 17
Sulligent, Alabama 35592
Lamar County

OPERATOR:

EQ Alabama, Inc.
51328 Highway 17
Sulligent, Alabama 35592
Lamar

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 EQ Alabama, Inc. for the facility located in Sulligent, Alabama, at latitude N 33° 50' 52" and longitude W 88° 06' 46".

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 May 20, 2015, as modified by subsequent amendments dated October 10, 2015, October 16, 2015, and May 16, 2016 (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 XXXX and shall remain in effect until XXXX 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 May 20, 2015, as modified by subsequent amendments dated October 10, 2015, October 16, 2015, and May 16, 2016.

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 AHWMMA, or any other law governing the protection of public health or the environment, for any imminent and substantial endangerment to human health, welfare, or the environment. (ADEM Admin. Code Rule 335-14-8-.01(4)).

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 AHWMMA, and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply

   a. Operating Units

      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. The application for a new permit must be submitted at least 180 calendar days before the expiration of this permit, as required by ADEM Admin. Code Rule 335-14-8-.03(1)(b)2.

   b. SWMU Corrective Action Requirements

      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), (3), and (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 the applicability or enforceability of 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 AHWMMA, 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 Waste Analysis Plan (WAP) Section C 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 C of the permit application, or an alternative method approved by ADEM. [ADEM Admin. Code Rule 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 monitoring 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 term of this permit. 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 for 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 term of this permit 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 IV 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 Permits

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 Rules 335-14-8-.04(1) or 335-14-8-.04(3)(a)1.(vii). Before transferring ownership or operation of the facility during the term of this permit, 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,

(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 (CQA) 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 a registered Professional Engineer (State of Alabama) 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. [ADEM Admin. Code Rule 335-14-8-.03(1)(1)2.]

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, post-closure care period, corrective action period, and throughout 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) or (3).

I.D. CONFIDENTIAL INFORMATION

The Permittee may claim confidential any information required to be submitted by this permit if the information is protected under the Code of Alabama 1975, §22-30-18, as amended. The term "trade secret" as used in §22-30-18 is defined in the Code of Alabama 1975, §22-30-2(12).

I.E. 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.

"Alternative Concentration Limit" (ACL), for the purposes of this permit, refers to a groundwater concentration limit which is established pursuant to ADEM Admin. Code Rule 335-14-5-.06(5)(b).

"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).

"Corrective action", for the purposes of this permit, is the sum of all corrective measures necessary to protect human health and the environment for all releases of hazardous constituents from any SWMU at the facility, regardless of the time at which waste was placed in the unit, as required by ADEM Admin. Code Rule 335-14-5-.06(11) and/or 335-14-5-.06(12). Corrective measures may address releases to air, soils, surface water, or groundwater.

“Corrective Action Management Unit” (CAMU), for the purposes of this permit, includes any area within a facility that is designated by the Department under ADEM Admin. Code Rule 335-14-5-.19 for the purpose of implementing corrective action requirements under ADEM Admin. Code Rule 335-14-5-.06(12), §22-30-19 et seq., Code of Alabama 1975, and/or RCRA section 3008(h). A CAMU shall only be used for the management of remediation waste pursuant to implementing such corrective actions requirements at the facility.

“Corrective measures”, for the purposes of this permit, include all individual measures taken and/or necessary to remedy releases and to protect human health and the environment for all releases of hazardous waste or hazardous constituents from any SWMU at the facility, regardless of the time at which waste was placed in the unit, as required under ADEM Admin. Code Rule 335-14-5-.06(12). Corrective measures may address releases to air, soils, surface water, or groundwater. The sum of all individual corrective measures is known as corrective action.

"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.

“Interim measures”, for the purposes of this permit, are actions necessary to minimize or prevent the further migration of contaminants and limit actual or potential human and environmental exposure to contaminants while long term corrective action remedies are evaluated and, if necessary, implemented.

“Land Disposal”, for the purposes of this permit, and ADEM Admin. Code Rule 335-14-9 means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, underground mine or cave, or concrete vault or bunker intended for disposal purposes.

“Landfill”, for the purposes of this permit, includes any disposal facility or part of a facility where hazardous waste is placed in or on the land and which is not a pile, a land treatment facility, a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, an underground mine, a cave, or a corrective action management unit.

“Land Use Controls", for the purposes of this permit, is as defined by ADEM Admin. Code Rule 335-15-1-.02.

A “maximum concentration limit” (MCL), for the purposes of this permit, refers to a groundwater concentration limit in Table 1 of ADEM Admin. Code Rule 335-14-5-.06(5), or which is listed in ADEM Admin. Code Rule 335-7-2 (Primary Drinking Water Standard) or ADEM Admin. Code Rule 335-7-3 (Secondary Drinking Water Standards) or analogous Federal safe drinking water regulators (40 CFR 141). In cases where a constituent is listed in multiple sources (ADEM Admin. Code Rule 335-14 and/or ADEM Admin. Code Rule 335-7, and /or 40 CFR 141), the most stringent standard shall apply.

"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 AHWMMA and ADEM Admin. Code Rule 335-14.

"Miscellaneous unit", for the purposes of this permit, means a hazardous waste management unit where hazardous waste is treated, stored, or disposed of and that is not a container, tank, surface impoundment, pile, land treatment unit, landfill, incinerator, boiler, industrial furnace, underground injection well with appropriate technical standards under 40 CFR Part 146, containment building, corrective action management unit, unit eligible for a research, development and demonstration permit under 335-14-8-.06(4); or staging pile.

"Munitions Debris" for purposes of this permit means remnants of munitions (*e.g.*, fragments, penetrators, projectiles, shell casings, links, fins) remaining after munitions use, demilitarization, or disposal.

"Non-regulated waste", for the purposes of this permit, means waste that is not otherwise regulated as RCRA listed and/or characteristic hazardous waste. In this case, non-regulated includes, but it not limited to, solid and universal waste, used oil, PCB, etc. Universal waste and used oil are subject to ADEM Admin. Code Rule 335-14-11, Standards for Universal Waste Management and ADEM Admin. Code Rule 335-14-17, Standards for the Management of Used Oil, respectively.

"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.

"Open burning" (OB), for the purposes of this permit, means the combustion of any material without the control of combustion air to maintain adequate temperature for efficient combustion, containment of the combustion-reaction in an enclosed device to provide sufficient residence time and mixing for complete combustion, and control of emission of the gaseous combustion products.

"Open detonation" (OD), for the purposes of this permit, means the explosion in which chemical transformation passes through the material faster than the speed of sound (0.33 kilometers/second at sea level) and which produces the uncontrolled emission of the gaseous detonation products.

"Practical quantitation limits" (PQL), for the purposes of this permit, are the lowest concentrations of analytes in groundwater that can be reliably determined within specified limits of precision and accuracy by a given method under routine laboratory operating conditions, as listed in ADEM Admin. Code Rule 335-14-5-Appendix IX.

"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.

“Remediation waste” for the purpose of this permit includes all SWMUs and all media (including groundwater, surface water, soils, and sediments) and debris, which contain listed hazardous wastes or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under ADEM Admin. Code Rule 335-14-5-.06(12) and RCRA Section 3008(h). For a given facility, remediation wastes may originate only from within the facility boundary, but may include waste managed in implementing RCRA Sections 3004(v) or 3008(h) for releases beyond the facility boundary.

“Solid waste”, for the purposes of this permit, means any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded materials, including solid, liquid, semisolid, or contained gaseous materials resulting from industrial, commercial, mining, and agricultural operations, and from community activities. It does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges which are point sources subject to permits under Section 402 of the Federal Water Pollution Control Act, as amended (86 Stat. 880), or source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 923).

"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.

“Temporary Unit” (TU), for the purposes of this permit, includes any temporary tanks and/or container storage areas used solely for treatment or storage of hazardous remediation wastes during specific remediation activities. Designated by the Department, such units must conform to specific standards and may only be in operation for a period of time as specified in this permit.

“Thermal treatment”, for the purposes of this permit, includes open burning and open detonation of hazardous energetics and energetic contaminated waste.

“unit”, for the purposes of this permit, includes any contiguous discernable area used for the management of hazardous waste (or non-hazardous waste in the case of a SWMU) and may include, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank, container storage area, septic tank, drain field, wastewater treatment unit, elementary neutralization unit, transfer station, recycling unit or the OB and OD units.

I.F. 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 (ADEM Admin. Code Rule 335-14-8-.05(1) and 335-14-8-.05(2)).

I.G. 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

   a. The Permittee shall maintain copies of this certification in the facility operating record as required by ADEM Admin. Code Rules 335-14-5-.05(4)(b)9.

   b. The Waste minimization Program required under I.G.1. should at a minimum address the following topics:

      i. Identity of each hazardous waste stream and the source of generation.

      ii. Types and amount of hazardous waste that is generated at the facility.

      iii. Present and proposed method of treatment, storage, or disposal that is available to the Permittee.

      iv. Description of techniques implemented in the past for hazardous waste reduction and their effectiveness.

      v. An evaluation of technically and economically feasible hazardous waste reduction techniques.

      vi. A program and schedule for implementing the selected hazardous waste reduction technique.

3. Solid Waste Minimization Objectives

   If Condition I.G. of this permit is applicable, the Waste Minimization program required under Condition I.G. above should address the objectives listed in Appendix A of this permit.

I.H. 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.I. FINANCIAL ASSURANCE (RESERVE this section if federal or state facility)

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 cost estimate to the Department when requesting approval for a reduction in the financial assurance mechanism.

I.J. PERMIT MODIFICATIONS

The Permittee shall request a permit modification whenever changes in operating plans or facility design affect any plan (*e.g.* groundwater monitoring, closure, 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 facility design or operation.

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

All reports, notifications, or other submissions that are required by this permit should be sent via certified mail or delivered as described below:

1. Two (2) hard copies and one (1) electronic copy in a standard text-searchable format (e.g., portable document format) acceptable to the Department shall be provided to the Chief of the Land Division using the following mailing address:

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

2. Upon request by the Department, the Permittee shall also provide 1 hard copy and/or 1 electronic copy to the Director of the RCRA Division using the following mailing address:

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

PART II

GENERAL FACILITY CONDITIONS

II.A. GENERAL WASTE ANALYSIS

1. The Permittee shall comply with all requirements set forth under ADEM Admin. Code Rule 335-14-5-.02(4) and shall follow the procedures in the WAP described in Part C-2 of the permit application.

2. The Permittee shall utilize the methods specified in Part C-2 of the permit application for the analysis of any of the wastes listed in Part A of the permit application. Modification of the WAP shall require a modification of this permit pursuant to ADEM Admin. Code Rule 335-14-8-.04(2).

3. The Permittee shall subject samples from incoming waste shipments to the fingerprint parameters identified in Section C 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 described in Section C-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 C-1 and Section C-2 of the permit application.

II.B. SECURITY

1. The Permittee shall comply with the security provisions set forth under ADEM Admin. Code Rule 335-14-5-.02(5) and as describe in Section F-1 of the permit application.

2. In order to comply with ADEM Admin. Code Rule 335-14-5-.02(5), the hazardous waste storage areas of the facility shall remain fenced with at least a six-foot high chain link fence. The fence shall be kept in good repair. All entrances to the permitted hazardous waste management areas shall be closed and locked when security and/or operations personnel are not present.

3. The Permittee shall maintain signs along the perimeter fence of the permitted hazardous waste management areas. The signs shall read “Danger – Unauthorized Personnel Keep Out”. At least one sign must be legible from a distance of at least 25 feet from any approach to each area (ADEM Admin. Code Rule 335-14-5-.02(5)(c)).

II.C. GENERAL INSPECTION REQUIREMENTS

1. The Permittee shall comply with all requirements of ADEM Admin. Code Rule 335-14-5-.02(6) and 335-14-5-.09(5),

2. The Permittee shall follow the inspection procedures and schedules, as described in Section F-2 of the permit application.

3. The Permittee shall remedy any deterioration or malfunction (of equipment or structure(s)) discovered during any inspection as required by ADEM Admin. Code Rule 335-14-5-.02(6).

4. Records of inspections shall be maintained at the facility as required by ADEM Admin. Code Rule 335-14-5-.02(6).

II.D. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by ADEM Admin. Code Rule 335-14-5-.02(7). This training program shall follow the procedures and outline, described in Section H of the permit application. The Permittee shall maintain training documents and records at the facility as required by ADEM Admin. Code Rule 335-14-5-.02(7)(d) and (e).

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

1. The Permittee shall comply with all requirements for ignitable, reactive, or incompatible wastes set forth under ADEM Admin. Code Rule 335-14-5-.02(8).

2. "No Smoking" signs must be conspicuously placed wherever there is a potential hazard from ignitable waste.

II.F. LOCATION STANDARDS AND UNIT MAINTENANCE

1. The Permittee shall comply with all locations standards set forth under ADEM Admin. Code Rule 335-14-5-.02(9).

2. If changes are made to the design or operation of a hazardous waste management or treatment unit, these changes must receive approval by the Department before they are implemented, and may require permit modification pursuant to ADEM Admin. Code Rule 335-14-8-.04(2).

II.G. PREPAREDNESS AND PREVENTION

1. Required Equipment

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

2. Testing and Maintenance of Equipment

   The Permittee shall test and maintain the equipment specified in the Contingency Plan, Section G of the permit application, as necessary to assure its proper operation in time of emergency as required by ADEM Admin. Code Rule 335-14-5-.03(4).

3. Access to Communication or Alarm System

   The Permittee shall maintain access to the communications or alarm system as required by ADEM Admin. Code Rule 335-14-5-.03(5).

4. Arrangements with Local Authorities

The Permittee shall maintain arrangements with state and local authorities as required by ADEM Admin. Code Rule 335-14-5-.03(8). The Permittee shall develop and maintain a Preparedness and Prevention Plan providing information on the Type, approximate quantities and locations of hazardous wastes within the facility. The Plan shall be provided to state and local authorities in both written paper format and in appropriate electronic format that is most useful to emergency responders. Updated copies of the Plan shall be provided to reflect significant changes in operations (*e.g.*, significant changes in waste streams and/or volumes, facility design changes, etc.). A copy of the Plan and documentation that the Plan has been submitted to all local police departments, fire departments, hospitals and local emergency response teams that may be called upon to provide emergency services, shall be submitted to the Department within 45 calendar days from the effective date of this permit. If state or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

5. Required Aisle Space

The Permittee shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency (ADEM Admin. Code Rule 335-14-5-.03(6)).

II.H. CONTINGENCY PLAN

1. Implementation of Plan

The Permittee shall immediately carry out the provisions of the Contingency Plan, (Section G of the permit application) and follow the emergency procedures as required by ADEM Admin. Code Rule 335-14-5-.04(2) whenever there is a fire, explosion, or release of hazardous waste or hazardous constituents which threatens or could threaten human health or the environment.

2. Copies of Plan

A copy of the Contingency Plan and all current revisions to the plan must be maintained at the facility and submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services, as described in Section G of the permit application, and as required by ADEM Admin. Code Rule 335-14-5-.04(4).

3. Amendments to Plan

The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by ADEM Admin. Code Rule 335-14-5-.04(5).

4. Emergency Coordination

The Permittee shall comply with the requirements of ADEM Admin. Code Rule 335-14-5-.04(6) concerning the emergency coordinator as specified in the Contingency Plan, (Section G of the permit application).

II.I. RECORDKEEPING AND REPORTING

1. Operating Record

   The Permittee shall maintain a written operating record at the facility in accordance with ADEM Admin. Code Rule 335-14-5-.05(4).

2. Availability, Retention, and Disposition of Records

   The Permittee shall comply with the Availability, Retention, and Disposition of Records at the facility in accordance with ADEM Admin. Code Rule 335-14-5-.05(5).

3. Biennial Report

   The Permittee shall comply with the biennial report requirements of ADEM Admin. Code Rule 335-14-5-.05(6).

II.J. CLOSURE

1. Performance Standard

   The Permittee shall close the permitted hazardous waste management areas, as required by ADEM Admin. Code Rules 335-14-5-.07(2), 335-14-5-.09(9), 335-14-5-.10(8), and in accordance with the Closure Plan, Section I-1 of the permit application.

2. Amendment to Closure Plan

   The Permittee shall amend the Closure Plan as required by ADEM Admin. Code Rule 335-14-5-.07(3)(c).

3. Notification of Closure

   As required by ADEM Admin. Code Rule 335-14-5-.07(3)(d), the Permittee shall notify the Department at least 60 calendar days prior to the date closure activities are initiated at either unit.

4. Time Allowed for Closure

   The Permittee shall comply with the requirements of ADEM Admin. Code Rule 335-14-5-.07(4). After receiving or treating the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the Closure Plan, Section I-1 of the permit application.

5. Disposal or Decontamination of Equipment

   The Permittee shall decontamination or dispose of all facility equipment as required by ADEM Admin. Code Rules 335-14-5-.07(5), 335-14-5-.09(9), 335-14-5-.10(8), 335-14-5-.11(9), and 335-14-5-.12(9) and as specified in the Closure Plan, Section I-1 of the permit application.

6. Certification of Closure

The Permittee shall certify that each individual unit has been closed in accordance with the specification presented in the Closure Plan, Section I-1 of the permit application, and as required by ADEM Admin. Code Rule 335-14-5-.07(6). The Permittee shall maintain copies of this closure certification in the facility operating record as required by ADEM Admin. Code Rule 335-14-5-.05(4).

II.K. POST-CLOSURE

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 Rules 335-14-5-.09(9)(b) and 335-14-5-.14(11).

1. Post-Closure Care Period

The Permittee shall begin post-closure care at all units, where closure by removal is not achieved, after completion of unit closure and shall continue for the duration of the post-closure period. The post-closure care shall continue for a period of 30 years after the closure of each hazardous waste management unit, unless shortened or extended pursuant to ADEM Admin. Code Rule 335-14-5-.07(8). Each post-closure care period is initiated upon certification by a registered Professional Engineer (State of Alabama) and upon acceptance by the Department pursuant to ADEM Admin. Code Rule 335-14-5-.07(6), that closure has been completed and waste has been left in place. The post-closure care period shall automatically extend through the end of the compliance period.

2. Post-Closure Security

The Permittee shall maintain security at the facility during post-closure care period in accordance with the post-closure plan included in the permit application.

3. Amendment to Post-Closure Plan

The Permittee shall amend the Post-Closure Plan in accordance with ADEM Admin. Code Rule 335-14-5-.07(9), whenever necessary.

4. The Permittee shall maintain continuous compliance with the following:

a. Post closure care of property. (ADEM Admin. Code Rule 335-14-5-.07(8))

b. Notice to local land authority and in deed to property. (ADEM Admin. Code Rule 335-14-5-.07(10))

II.L. LAND DISPOSAL RESTRICTIONS

1. General Restrictions

ADEM Admin. Code Rule 335-14-9 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances in which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage or disposal unit. The Permittee shall maintain compliance with the requirements of ADEM Admin. Code Rule 335-14-9. Where the Permittee has applied for an extension, waiver, or variance under

ADEM Admin. Code Rule 335-14-9 the Permittee shall comply with all restrictions on land disposal under this Part once the effective date for the waste has been reached pending final approval of such a land disposal permit application.

2. Land Disposal Prohibitions and Treatment Standards

a. A restricted waste identified in ADEM Admin. Code Rule 335-14-9-.03 may not be placed in a land disposal unit without further treatment unless the requirements of ADEM Admin. Code Rules 335-14-9-.03 and/or .04 are met.

b. The storage of hazardous wastes restricted from land disposal under ADEM Admin. Code Rule 335-14-9 is prohibited unless the requirements of ADEM Admin. Code Rule 335-14-9-.05 are met.

II.M. ORGANIC AIR EMISSION REQUIREMENTS

1. General Introduction

a. Process Vents and Equipment

Phase I Organic Air Emission Standards consist of ADEM Admin. Code Rule 335-14-5-.27 and 335-14-5-.28 for hazardous waste treatment, storage, and disposal (TSD) facilities. ADEM Admin. Code Rule 335-14-5-.27 contains emission standards for process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, and air or steam stripping operations that process hazardous waste with an annual average total organic concentration of at least ten (10) parts per million by weight (ppmw). ADEM Admin. Code Rule 335-14-5-.28 contains emission standards that address leaks from specific equipment (i.e., pumps, valves, compressors, etc.) containing or contacting hazardous waste with a total organic concentration of at least ten-percent by weight.

b. Tanks, Containers, Surface Impoundments and Miscellaneous Units

The Phase II Organic Emission Standards consist of ADEM Admin. Code Rule 335-14-5-.29 for hazardous waste treatment, storage, and disposal facilities, including certain hazardous waste generator standards for accumulating waste on-site in RCRA permit–exempt (90-day) tanks and containers. In general, under these standards air emission controls must be used for tanks, surface impoundments, containers, and miscellaneous units that contact hazardous waste containing an average organic concentration greater than 500 ppmw at the point of origination determined by the procedures outlined in ADEM Admin. Code Rule 335-14-5 .29(4), except as specifically exempted under ADEM Admin. Code Rules 335-14-5-.29(1) and 335-14-5-.29(3).

2. Notification of New Units

a. Process Vents and Equipment

Prior to constructing any equipment with process vents subject to the requirements of ADEM Admin. Code Rule 335-14-5-.27, or installing any additional equipment subject to the requirements of ADEM Admin. Code Rule 335-14-5-.28, or prior to modifying the current process such that existing equipment previously not subject to the requirement of ADEM Admin. Code Rule 335-14-5-.28 the Permittee shall supply the specific Part B information required pursuant to ADEM Admin. Code Rules 335-14-8-.02(15) and 335-14-8-.02(16) as applicable, and shall obtain a permit modification in accordance with the requirements of ADEM Admin. Code Rule 334-14-8-.04(3) and Condition I.J of this permit.

b. Tanks, Containers, Surface Impoundments, Miscellaneous Units

Prior to installing any tank, container, surface impoundment or miscellaneous unit subject to ADEM Admin. Code Rule 335-14-5-.29, or modifying an existing process waste handling or tank or container such that the unit(s) will become subject to ADEM Admin. Code Rule 335-14-5-.29, the Permittee shall obtain a permit modification under ADEM Admin. Code Rule 335-14-8-.04(3), and provide specific Part B application information required under ADEM Admin. Code Rules 335-14-8-.02(5) –thru (8) and 335-14-8-.02(18), as applicable, with the modification request.

II.N. WASTE REJECTION NOTIFICATION

The Permittee shall notify the Department in writing of all hazardous wastes that are rejected after arrival 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 names of 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 copies of the manifest(s) or shipping papers; and,

4. The certification (as required by ADEM Admin. Code Rule 335-14-8-.02(2)(d)) signed by the owner or operator of the facility or his or her authorized representative.

II.O. MANIFEST SYSTEM

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

1. Use of the Manifest System

   a. The Permittee shall provide the manifest form to persons prior to their shipment of hazardous waste, as required by ADEM Admin. Code R. 335-14-5-.05(1). All manifests shall include the state manifest document number as designated by the Department. (ADEM Admin. Code R. 335-14-5-.05(2)(a))

   b. If the Permittee receives hazardous waste accompanied by a manifest, the Permittee must:

      i. Sign and date each copy of the manifest acknowledging receipt of the waste;

      ii. Note any significant discrepancies in the manifest as described in ADEM Admin. Code R. 335-14-5-.05(3)(a);

      iii. Immediately give the transporter at least one copy of the signed manifest;

      iv. Within 30 days after delivery, send a copy of the manifest to the generator;

      v. Retain a copy of each manifest for at least three years; and

      vi. Within 60 days after delivery of the waste to the facility, send a copy of the manifest to the Department, as required by §22-30-17(c) of the AHWMMA. Manifests should be submitted to the Department on a monthly basis.

   c. When the decision is made to accept the waste shipment for storage, treatment, and/or disposal at the facility (after the waste shipment has been inspected, sampled, and analyzed), the Permittee shall place the proper handling code on the manifest, as described in Section D of the permit application.

   d. The Permittee may stage a waste shipment for up to 72 hours after the shipment has been received (in accordance with Condition II.O.1.b.i. of this permit) before placing the waste into a permitted treatment, storage, or disposal area, as described in Section D of the permit application.

2. Manifest Discrepancies

   a. Upon discovering a significant discrepancy (as defined by ADEM Admin. Code R. 335-14-5-.05(3)(a)), the Permittee must attempt to reconcile the discrepancy with the generator or transporter.

b. If the discrepancy is not resolved within 15 calendar days after receiving the waste, the Permittee must immediately submit to the Department a letter describing the discrepancy and attempts to reconcile it, a copy of the manifest or shipping paper at issue, and a description of what resolution(s) occurred. If a discrepancy is not resolved within 15 calendar days, the waste must be rejected back to the generator within 10 calendar days.

3. Unmanifested Waste Report

a. If the Permittee accepts for treatment, storage, or disposal any hazardous waste from an off-site source without an accompanying manifest, or without an accompanying shipping paper as described in ADEM Admin. Code R. 335-14-4-.02(1)(e)2., and if the waste is not excluded from the manifest requirement by ADEM Admin. Code R. 335-14-2-.01(5), then the Permittee must prepare and submit a single copy of the report to the Department within 15 days after receiving the waste. [Note: Hazardous waste which arrives at the facility with other manifested hazardous waste and which is accepted for treatment, storage or disposal at the facility, but which is not included on a manifest, shall be reported as unmanifested waste pursuant to this Condition. Hazardous wastes which are not accepted for treatment, storage, or disposal at the facility are subject to the waste rejection reporting requirements contained in Condition II.N. of this permit.] (ADEM Admin. Code R. 335-14-5-.05(7)).

b. The unmanifested waste report must be submitted to the Department. Such report must be designated "Unmanifested Waste Report" and include the following information:

i. The EPA Identification Number, name and address of the facility;

ii. The date the facility received the waste;

iii. The EPA Identification Number, name and address of the generator and the transporter, if available;

iv. A description and the quantity of each unmanifested hazardous waste the facility received;

v. The method of storage for each hazardous waste;

vi. The certification signed by the owner or operator of the facility or his or her authorized representative; and

vii. A brief explanation of why the waste was unmanifested, if known.

4. Waste Acceptance

The Permittee shall not accept (*i.e.*, assign handling codes) any shipment of waste until the waste analysis has confirmed that the waste matches the waste profile, that the facility is authorized to manage the waste, and all manifest discrepancies are resolved pursuant to ADEM Admin. Code R. 335-14-5-.05(3).

II.P. CONSTRUCTION COMPLIANCE SCHEDULE FOR PROPOSED UNITS

All proposed units, whether simultaneously constructed or not, are subject to the following conditions:

1. Actual, physical onsite construction of all proposed units must be initiated within two (2) years of the date of the issuance of this permit;

2. Detailed construction drawings of all proposed units must be submitted for the Department's review at least 60 calendar days before the initiation of construction;

3. The Permittee must meet all "Certification of Construction" requirements of Permit Condition I.C.13.;

4. The Permittee must meet all cost estimates and financial assurance requirements of Permit Conditions I.H.4.

PART III

MANAGEMENT IN CONTAINERS

III.A. PERMITTED OPERATIONS

The Permittee may operate the units and processes described in Table III.1. and Table III.2. of this permit, subject to the terms of this permit. Operation of any process or unit not listed in Table III.1. and Table III.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.

III.B. WASTE IDENTIFICATION

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

2. The Permittee shall not store mixed waste in containers at the facility.

III.C. STORAGE IN CONTAINERS

1. The Permittee shall maintain and operate the container storage area in accordance with the procedures specified in Section D-1 of the permit application.

2. The container storage capacity is distributed throughout the container storage area as shown in Table III.1 of this permit, and as described in Section D 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 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. Individual container should not be stored in an area with a volume that exceeds the capacity of the containment system for that area.

4. 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 wastes in containers only in the container processing areas listed in Table III.2 of this permit and as described in Section D of the permit application.

III.E. 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 Rule 335-14-5-.09(2).

III.F. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall assure that the ability of the container to contain the waste is not impaired, as required by ADEM Admin. Code Rule 335-14-5-.09(3).

III.G. MANAGEMENT OF CONTAINERS

1. The Permittee shall manage containers as required by ADEM Admin. Code Rule 335-14-5-.09(4) and Section D of the permit application.

2. A container holding hazardous waste must always be closed during storage, except when it is necessary to add, remove, sample, or inspect the waste.

3. A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

4. Adequate aisle space will be maintained at all times, as shown in Section D of the storage permit application, and as necessary to provide adequate access for emergency equipment and inspection.

5. Containers having a capacity greater than or equal to 30 gallons shall not be stacked over two containers high at any time.

III.H. 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 Rule 335-14-5-.09(6)(b) and as specified in Section D of the permit application.

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

III.I. INSPECTIONS

The Permittee shall conduct weekly inspection of 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 Permit Condition III.G.5. and as required by ADEM Admin. Code Rule 335-14-5-.09(5). The Permittee shall note the number and capacity of hazardous waste containers present.

III.J. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line as required by ADEM Admin. Code Rule 335-14-5-.09 (7).

2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures specified in Section D and Section F-5 of the permit renewal application and as required by ADEM Admin. Code Rule 335-14-5-.02(8).

III.K. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

The Permittee shall separate containers of incompatible wastes as specified in Section D and Section F-5 of the permit application.

1. Incompatible wastes, or incompatible wastes and materials, must not be placed in the same container unless the Permittee is in compliance with ADEM Admin. Code Rule 335-14-5-.02(8)(b).

2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

3. The Permittee must document compliance with Conditions III.K.1. and III.K.2. of this permit as required by ADEM Admin. Code Rule 335-14-5-.05(4) and place this documentation in the operating record.

4. The Permittee shall separate containers of incompatible wastes as required by ADEM Admin. Code Rule 335-14-5-.09(8)(c).

III.L. 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 I of the permit application and of ADEM Admin Code Rules 335-14-5-.07(2) and 335-14-5-.09(9).

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 Rules 335-14-5-.09(9)(b) and 335-14-5-.14(11).

TABLE III.1

STORAGE IN CONTAINERS

UNIT NAME	CONTAINMENT AREA	PERMITTED STORAGE CAPACITY (gallons)	CONTAINMENT CAPACITY (gallons)	DESCRIPTION OF UNIT (Section[1])	LOCATION OF UNIT (Figure[1])
Container Storage Building	Area 1	12,850	1285	D-1a(3)(a)	3
	Area 2 through 5	94,000	9400	D-1a(3)(a)	3
Roll Off Pad		484,738	n/a[2]	D-1a(1)(b)	4
TOTAL CONTAINER TREATMENT CAPACITY		591,588			

1. Location in permit application containing description (text) or location (figure) of unit.
2. Storage of containers that contain free liquids are not allowed on the Roll Off Pad; therefore secondary containment capacity is not applicable (D-1a(3)(6)).

TABLE III.2

TREATMENT IN CONTAINERS

TREATMENT PROCESS (Code[2])	UNIT(S) PERMITTED	PERMITTED TREATMENT CAPACITY (gallons/day)	DESCRIPTION OF PROCESS (Section[1])	LOCATION OF PROCESS (Figure[1])	DESCRIPTION OF UNIT (Section[1])	LOCATION OF UNIT (Figure[1])
T04	Bulking Pad	10,099	D-1c(3)	2	D-1a(1)(c)	5
T04	Liquid Bulking Area	6,000	D-1c(1)	2	D-1a(1)(a)i	3
T04	Solids & Liquid Blending in Roll-Off Box at Bulking Pad	n/a: capacity listed above	D-1c(4)	2	D-1a(1)(d)	5
T04	Solids Stabilization in Roll-Off Box at Bulking Pad	n/a: capacity listed above	D-1c(5)	2	D-1a(1)(e)	5
TOTAL CONTAINER TREATMENT CAPACITY		16,099				

1. Location in permit application containing description (text) or location (figure) of unit.
2. Treatment process codes as defined in ADEM Admin. Code R. 335-14-5-Appendix I.

PART IV

SOLID WASTE MANAGEMENT UNIT AND AREAS OF CONCERN IDENTIFICATION AND EVALUATION

IV.A. APPLICABILITY

The Conditions of this Part apply to:

1. The solid waste management units (SWMUs) and areas of concern (AOCs) identified in Table IV.1., which require investigation and/or remediation;

2. The SWMUs identified in Table IV.2., which require no further investigation under this permit at this time;

3. **RESERVE**

4. The SWMUs/AOCs identified in Table IV.4, which require Interim Measures and/or Source Removal;

5. The SWMUs/AOCs identified in Table IV.5, which require a Corrective Measures Implementation (CMI) Plan.

6. Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means; and,

7. 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. Assurance of financial responsibility for completion of such off-site corrective action will be required.

IV.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 IV.A.4. 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 IV.A.4.

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 IV.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 soil analyses, air, groundwater data, and/or surface water data).

4. Based on 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 IV.D.1. immediately upon receiving notification of the Department's determination.

IV.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 IV.A.2. or SWMUs or AOCs identified in Permit Condition IV.A.6. 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 IV.D. immediately upon receiving notification of the Department's determination.

IV.D. RCRA FACILITY INVESTIGATION (RFI)

1. The Permittee must perform an RFI for any SWMU and AOC identified by the Department in accordance with Permit Conditions IV.A.1, IV.B.4, and IV.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 (AEIRG).

5. Except as provided by Permit Condition IV.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 Conditions IV.B. and IV.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, which 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 IV.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:

A. The location of each sampling point identified on a site map;

B. The concentration of each hazardous constituent detected at each sampling point; and

C. 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 AEIRG.

c. The RFI Report shall be reviewed by the Department in accordance with Permit Condition IV.G.

IV.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 AEIRG.

2. The CMI Plan shall be submitted to the Department within 120 calendar days following Permittee's the 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 Rule 335-14-8-.04(2), and shall include any applicable fees

pursuant to ADEM Admin. Code Rule 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 IV.E.3., the Permittee shall demonstrate financial assurance for completing the approved remedy, except for federal and state facilities.

5. The Permittee shall submit to the Department the CMI Plan for the SWMUs/SWMUs and AOCs listed in Table IV.5 for review and approval within 120 calendar days from the effective date of this permit.

IV.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 IV.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 IV.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 IV.G.

   e. The Permittee shall submit IM WPs for the SWMUs and AOCs listed in Table IV.4 of this permit to the Department for review and approval. The IM WPs shall be submitted within 180 days from the effective date of this permit.

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 IV.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 or 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 IV.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.

IV.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 IV.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. All submittals shall be provided by the Permittee in accordance with Permit Condition I.K.

IV.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 IV.H.I. 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 the 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 Department's 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 IV.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.

Master List of known SWMUs/ AOCs at the facility:

SWMU/AOC NUMBER	SWMU/AOC NAME
SWMU 1	Container Storage Building
SWMU 2	Roll-off Pad
SWMU 3	Bulking Pad
SWMU 4	Inactive Liquid Bulking Area
SWMU 5	Loading Dock
AOC 1	Grubbed Area
AOC 2	Stained Soil
AOC 3	Concrete Block

Table IV.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 a RCRA Facility Investigation (RFI):

SWMU/AOC NUMBER	SWMU/AOC NAME
None at this time	

Table IV.3

The following Solid Waste Management Unit (SWMU) and/or Area 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
SWMU 1	Container Storage Building
SWMU 2	Roll-off Pad
SWMU 3	Bulking Pad
SWMU 4	Inactive Liquid Bulking Area
SWMU 5	Loading Dock
AOC 1	Grubbed Area
AOC 2	Stained Soil
AOC 3	Concrete Block

Table IV.4

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 action under other programs, such as MMRP, CERCLA, etc.:

SWMU/AOC NUMBER	SWMU/AOC NAME
None at this time	

Table IV.5

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 Interim Measures (IM) and/or Source Removal:

SWMU/AOC NUMBER	SWMU/AOC NAME
None at This Time	

Table IV.6

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 regulated by Parts I – VIII of this permit:

SWMU/AOC NUMBER	SWMU/AOC NAME
SWMU 1	Container Storage Building
SWMU 2	Roll-off Pad
SWMU 3	Bulking Pad

Table IV.7

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 Corrective Measure Implementation (CMI) Plan:

SWMU/AOC NUMBER	SWMU/AOC NAME
None at This Time	

PART V

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.

PERMIT CONDITION	ITEM	DUE DATE
I.C.2.b.	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.G.	Waste Minimization Certification	Annually
I.H.	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 Rules 335-14-5-.08(3)(b), (5)(b), and (10)(b).
I.J.	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.
IV.B.1.	Notify the Department, in writing, of the discovery of any additional AOCs.	Within 15 calendar days of discovery.
IV.B.2.	Notify the Department, in writing, of the discovery of any additional SWMUs.	Within 15 calendar days of discovery
IV.B.3.	Submit a SWMU Assessment Report (SAR) for each SWMU identified under IV.B.2.	Within 90 calendar days of notification.

PERMIT CONDITION	ITEM	DUE DATE
IV.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.
IV.D.7.	Submit RFI progress reports.	Monthly basis beginning in the second month following the initiation of the RFI.
IV.D.8	Submit RFI Report	Within 60 calendar days from the completion of investigation activities.
IV.E.2	Submit CMI Plan	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.
IV.E.4.	Demonstrate financial assurance for completing the approved remedy.	Within 120 calendar days after this Permit has been approved.
IV.F.1.	Submit IM Work Plan	Within 30 calendar days upon notification by the Department.
IV.F.3.	Submit IM Report	Within 90 calendar days of completion of IM.

Renewal Application Request
For
Hazardous Waste Facility Permit

EQ Alabama, Inc.
51328 Highway 17
Sulligent, Alabama 35586

ALD 983 177 015

Submitted: May 20, 2015

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Part A Application Form

OMB# 2050-0024; Expires 01/31/2017

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (MARK ALL BOX(ES) THAT APPLY)

Reason for Submittal:

- ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)
- ☐ To provide a Subsequent Notification (to update site identification information for this location)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ■ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # Re-apply)
- ☐ As a component of the Hazardous Waste Report (If marked, see sub-bullet below)
  - ☐ 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 report year (or State equivalent LQG regulations)

2. Site EPA ID Number

EPA ID Number A L D 9 8 3 1 7 7 0 1 5

3. Site Name

Name: EQ Alabama, Inc.

4. Site Location Information

Street Address: 51328 Highway 17

City, Town, or Village: Sulligent | **County:** Lamar

State: Alabama | **Country:** USA | **Zip Code:** 35586

5. Site Land Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

6. NAICS Code(s) for the Site (at least 5-digit codes)

A. 5 6 2 2 1 1 | C.

B. | D.

7. Site Mailing Address

Street or P.O. Box: 51328 Highway 17

City, Town, or Village: Sulligent

State: Alabama | **Country:** USA | **Zip Code:** 35586

8. Site Contact Person

First Name: Shanda | **MI:** | **Last:** Murff

Title: Operations Supervisor

Street or P.O. Box: 51328 Highway 17

City, Town or Village: Sulligent

State: Alabama | **Country:** USA | **Zip Code:** 35586

Email: shanda.murff@usecology.com

Phone: (205) 698-7508 | **Ext.:** | **Fax:** (205) 698-8923

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner: EQ Alabama, Inc. | **Date Became Owner:** 3/14/2012

Owner Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street or P.O. Box: 51328 Highway 17

City, Town, or Village: Sulligent | **Phone:** (205)698-8915

State: Alabama | **Country:** USA | **Zip Code:** 35586

B. Name of Site's Operator: EQ Alabama, Inc. | **Date Became Operator:** 3/14/2012

Operator Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

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; Complete all parts 1-10.

Y ☑ N ☐ **1. Generator of Hazardous Waste**
If "Yes," mark only one of the following – a, b, or c.

- ☑ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; **or** Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; **or** Generates, in any calendar month, **or** accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-10.

Y ☐ N ☑ **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.

Y ☐ N ☑ **3. United States Importer of Hazardous Waste**

Y ☐ N ☑ **4. Mixed Waste (hazardous and radioactive) Generator**

Y ☑ N ☐ **5. Transporter of Hazardous Waste**
If "Yes," mark all that apply.

- ☐ a. Transporter
- ☑ b. Transfer Facility (at your site)

Y ☑ N ☐ **6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.

Y ☐ N ☑ **7. Recycler of Hazardous Waste**

Y ☐ N ☑ **8. Exempt Boiler and/or Industrial Furnace**
If "Yes," mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☑ **9. Underground Injection Control**

Y ☑ N ☐ **10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

Y ☑ N ☐ **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.**

- a. Batteries ☑
- b. Pesticides ☑
- c. Mercury containing equipment ☑
- d. Lamps ☑
- e. Other (specify) _____ ☐
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☐ N ☑ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y ☐ N ☑ **1. Used Oil Transporter**
If "Yes," mark all that apply.

- ☐ a. Transporter
- ☑ b. Transfer Facility (at your site)

Y ☐ N ☑ **2. Used Oil Processor and/or Re-refiner**
If "Yes," mark all that apply.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☑ **3. Off-Specification Used Oil Burner**

Y ☐ N ☑ **4. Used Oil Fuel Marketer**
If "Yes," mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

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

- ❖ You can ONLY Opt into Subpart K if:
  - you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
  - you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y☐ N☑ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories **See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:**

☐ **a. College or University**

☐ **b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university**

☐ **c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university**

Y☐ N☑ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

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

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D012	D013	D014
D015	D016	D017	D018	D019	D020	D021
D022	D023	D024	D025	D026	D027	D028
D029	D030	D031	D032	D033	D034	D035
D036	D037	D038	D039	D040	D041	D042
D043	F001	F002	F003	F004	F005	F006
F007	F008	F009	F010	F011	F012	F019
F020	F021	F022	F023	F024	F025	F026

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated 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.

NA						

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☑ 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 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

See attached pages for additional list of waste codes from Item 11.A

14. 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. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
Shanda Murff	Shanda Murff Operations Supervisor	May 20, 2015

EQ ALABAMA, INC.
ALD 983 177 015

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OMB#: 2050-0024; Expires 01/31/2017

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact

First Name: Shanda **MI:** **Last Name:** Murff

Contact Title: Facilities Supervisor

Phone: (205) 698-7508 **Ext.:** **Email:** shanda.murff@usecology.com

2. Facility Permit Contact Mailing Address

Street or P.O. Box: 51328 Highway 17

City, Town, or Village: Sulligent

State: Alabama

Country: USA **Zip Code:** 35586

3. Operator Mailing Address and Telephone Number

Street or P.O. Box: 51328 Highway 17

City, Town, or Village: Sulligent

State: Alabama **Phone:** (205) 698-8915

Country: USA **Zip Code:** 35586

4. Facility Existence Date

Facility Existence Date (mm/dd/yyyy): 11/5/1985

5. Other Environmental Permits

A. Facility Type (Enter code)	B. Permit Number	C. Description
N	ALD983177015	NPDES Permit

6. Nature of Business: EQ Alabama, Inc. operates a hazardous waste transfer, storage, and treatment facility. Wastes are received from off-site generators for storage, consolidation, bulking, and/or treatment via solidification or stabilization processes. Storage occurs in non-bulk containers, bags, totes, roll-off containers, dump trailers, vac-trucks, and box vans. All received wastes are sent to alternate facilities for final disposal.

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.**
2. **UNIT OF MEASURE – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.**

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure Listed Below
Storage		
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards
S06	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
Treatment		
T01	Tank Treatment	Gallons Per Day; Liters Per Day
T02	Surface Impoundment	Gallons Per Day; Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity (for T81 – T94)
Treatment (Continued)		
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, or Refining Furnace	
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Miscellaneous (Subpart X)		
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; or Million BTU Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

Unit of Measure	Unit of Measure Code
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V
Short Tons Per Hour	D
Short Tons Per Day	N
Metric Tons Per Hour	W
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	X
Million BTU Per Hour	X
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
BTU Per Hour	I

7. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. (2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	S	0	1	106,850	G	001	
	2	S	0	1	484,738	G	001	
	3							
	4							
	5							
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 7)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure	C. Process Total Number of Units	For Official Use Only
X	2	T	0	4	100.00	U	001	
0	3	T	0	4	10,099	U	001	
0	4	T	0	4	6,000	U	001	
0	5	T	0	4	10,099	U	001	
0	6	T	0	4	10,099	U	001	

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

A. EPA HAZARDOUS WASTE NUMBER – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. **Enter the first two as described above.**
2. **Enter "000" in the extreme right box of Item 9.D(1).**
3. **Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.**

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. **Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.**
2. **In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.**
3. **Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.**

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA Hazardous Waste No. (Enter code)				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))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)	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	D001	32,000	T	S01 T04	
	2	D002	32,000	T	S01 T04	
	3	D003	32,000	T	S01 T04	
	4	D004	32,000	T	S01 T04	
	5	D005	32,000	T	S01 T04	
	6	D006	32,000	T	S01 T04	
	7	D007	32,000	T	S01 T04	
	8	D008	32,000	T	S01 T04	
	9	D009	32,000	T	S01 T04	
1	0	D010	32,000	T	S01 T04	
1	1	D011	32,000	T	S01 T04	
1	2	D012	32,000	T	S01 T04	
1	3	D013	32,000	T	S01 T04	
1	4	D014	32,000	T	S01 T04	
1	5	D015	32,000	T	S01 T04	
1	6	D016	32,000	T	S01 T04	
1	7	D017	32,000	T	S01 T04	
1	8	D018	32,000	T	S01 T04	
1	9	D019	32,000	T	S01 T04	
2	0	D020	32,000	T	S01 T04	
2	1	D021	32,000	T	S01 T04	
2	2	D022	32,000	T	S01 T04	
2	3	D023	32,000	T	S01 T04	
2	4	D024	32,000	T	S01 T04	
2	5	D025	32,000	T	S01 T04	
2	6	D026	32,000	T	S01 T04	
2	7	D027	32,000	T	S01 T04	
2	8	D028	32,000	T	S01 T04	
2	9	D029	32,000	T	S01 T04	
3	0	D030	32,000	T	S01 T04	
3	1	D031	32,000	T	S01 T04	
3	2	D032	32,000	T	S01 T04	
3	3	D033	32,000	T	S01 T04	
3	4	D034	32,000	T	S01 T04	
3	5	D035	32,000	T	S01 T04	
3	6	D036	32,000	T	S01 T04	

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
3	7	D	0	3	7	32,000	T	S	0	1	T	0	4				
3	8	D	0	3	8	32,000	T	S	0	1	T	0	4				
3	9	D	0	3	9	32,000	T	S	0	1	T	0	4				
4	0	D	0	4	0	32,000	T	S	0	1	T	0	4				
4	1	D	0	4	1	32,000	T	S	0	1	T	0	4				
4	2	D	0	4	2	32,000	T	S	0	1	T	0	4				
4	3	D	0	4	3	32,000	T	S	0	1	T	0	4				
4	4	F	0	0	1	32,000	T	S	0	1	T	0	4				
4	5	F	0	0	2	32,000	T	S	0	1	T	0	4				
4	6	F	0	0	3	32,000	T	S	0	1	T	0	4				
4	7	F	0	0	4	32,000	T	S	0	1	T	0	4				
4	8	F	0	0	5	32,000	T	S	0	1	T	0	4				
4	9	F	0	0	6	32,000	T	S	0	1	T	0	4				
5	0	F	0	0	7	32,000	T	S	0	1	T	0	4				
5	1	F	0	0	8	32,000	T	S	0	1	T	0	4				
5	2	F	0	0	9	32,000	T	S	0	1	T	0	4				
5	3	F	0	1	0	32,000	T	S	0	1	T	0	4				
5	4	F	0	1	1	32,000	T	S	0	1	T	0	4				
5	5	F	0	1	2	32,000	T	S	0	1	T	0	4				
5	6	F	0	1	9	32,000	T	S	0	1	T	0	4				
5	7	F	0	2	0	32,000	T	S	0	1	T	0	4				
5	8	F	0	2	1	32,000	T	S	0	1	T	0	4				
5	9	F	0	2	2	32,000	T	S	0	1	T	0	4				
6	0	F	0	2	3	32,000	T	S	0	1	T	0	4				
6	1	F	0	2	4	32,000	T	S	0	1	T	0	4				
6	2	F	0	2	5	32,000	T	S	0	1	T	0	4				
6	3	F	0	2	6	32,000	T	S	0	1	T	0	4				
6	4	F	0	2	7	32,000	T	S	0	1	T	0	4				
6	5	F	0	2	8	32,000	T	S	0	1	T	0	4				
6	6	F	0	3	2	32,000	T	S	0	1	T	0	4				
6	7	F	0	3	4	32,000	T	S	0	1	T	0	4				
6	8	F	0	3	5	32,000	T	S	0	1	T	0	4				
6	9	F	0	3	7	32,000	T	S	0	1	T	0	4				
7	0	F	0	3	8	32,000	T	S	0	1	T	0	4				
7	1	F	0	3	9	32,000	T	S	0	1	T	0	4				
7	2	K	0	0	1	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
7	3	K	0	0	2	32,000	T	S	0	1	T	0	4				
7	4	K	0	0	3	32,000	T	S	0	1	T	0	4				
7	5	K	0	0	4	32,000	T	S	0	1	T	0	4				
7	6	K	0	0	5	32,000	T	S	0	1	T	0	4				
7	7	K	0	0	6	32,000	T	S	0	1	T	0	4				
7	8	K	0	0	7	32,000	T	S	0	1	T	0	4				
7	9	K	0	0	8	32,000	T	S	0	1	T	0	4				
8	0	K	0	0	9	32,000	T	S	0	1	T	0	4				
8	1	K	0	1	0	32,000	T	S	0	1	T	0	4				
8	2	K	0	1	1	32,000	T	S	0	1	T	0	4				
8	3	K	0	1	3	32,000	T	S	0	1	T	0	4				
8	4	K	0	1	4	32,000	T	S	0	1	T	0	4				
8	5	K	0	1	5	32,000	T	S	0	1	T	0	4				
8	6	K	0	1	6	32,000	T	S	0	1	T	0	4				
8	7	K	0	1	7	32,000	T	S	0	1	T	0	4				
8	8	K	0	1	8	32,000	T	S	0	1	T	0	4				
8	9	K	0	1	9	32,000	T	S	0	1	T	0	4				
9	0	K	0	2	0	32,000	T	S	0	1	T	0	4				
9	1	K	0	2	1	32,000	T	S	0	1	T	0	4				
9	2	K	0	2	2	32,000	T	S	0	1	T	0	4				
9	3	K	0	2	3	32,000	T	S	0	1	T	0	4				
9	4	K	0	2	4	32,000	T	S	0	1	T	0	4				
9	5	K	0	2	5	32,000	T	S	0	1	T	0	4				
9	6	K	0	2	6	32,000	T	S	0	1	T	0	4				
9	7	K	0	2	7	32,000	T	S	0	1	T	0	4				
9	8	K	0	2	8	32,000	T	S	0	1	T	0	4				
9	9	K	0	2	9	32,000	T	S	0	1	T	0	4				
0	0	K	0	3	0	32,000	T	S	0	1	T	0	4				
0	1	K	0	3	1	32,000	T	S	0	1	T	0	4				
0	2	K	0	3	2	32,000	T	S	0	1	T	0	4				
0	3	K	0	3	3	32,000	T	S	0	1	T	0	4				
0	4	K	0	3	4	32,000	T	S	0	1	T	0	4				
0	5	K	0	3	5	32,000	T	S	0	1	T	0	4				
0	6	K	0	3	6	32,000	T	S	0	1	T	0	4				
0	7	K	0	3	7	32,000	T	S	0	1	T	0	4				
0	8	K	0	3	8	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
0	9	K	0	3	9	32,000	T	S	0	1	T	0	4				
1	0	K	0	4	0	32,000	T	S	0	1	T	0	4				
1	1	K	0	4	1	32,000	T	S	0	1	T	0	4				
1	2	K	0	4	2	32,000	T	S	0	1	T	0	4				
1	3	K	0	4	3	32,000	T	S	0	1	T	0	4				
1	4	K	0	4	4	32,000	T	S	0	1	T	0	4				
1	5	K	0	4	5	32,000	T	S	0	1	T	0	4				
1	6	K	0	4	6	32,000	T	S	0	1	T	0	4				
1	7	K	0	4	7	32,000	T	S	0	1	T	0	4				
1	8	K	0	4	8	32,000	T	S	0	1	T	0	4				
1	9	K	0	4	9	32,000	T	S	0	1	T	0	4				
2	0	K	0	5	0	32,000	T	S	0	1	T	0	4				
2	1	K	0	5	1	32,000	T	S	0	1	T	0	4				
2	2	K	0	5	2	32,000	T	S	0	1	T	0	4				
2	3	K	0	6	0	32,000	T	S	0	1	T	0	4				
2	4	K	0	6	1	32,000	T	S	0	1	T	0	4				
2	5	K	0	6	2	32,000	T	S	0	1	T	0	4				
2	6	K	0	6	4	32,000	T	S	0	1	T	0	4				
2	7	K	0	6	5	32,000	T	S	0	1	T	0	4				
2	8	K	0	6	6	32,000	T	S	0	1	T	0	4				
2	9	K	0	6	9	32,000	T	S	0	1	T	0	4				
3	0	K	0	7	1	32,000	T	S	0	1	T	0	4				
3	1	K	0	7	3	32,000	T	S	0	1	T	0	4				
3	2	K	0	8	3	32,000	T	S	0	1	T	0	4				
3	3	K	0	8	4	32,000	T	S	0	1	T	0	4				
3	4	K	0	8	5	32,000	T	S	0	1	T	0	4				
3	5	K	0	8	6	32,000	T	S	0	1	T	0	4				
3	6	K	0	8	7	32,000	T	S	0	1	T	0	4				
3	7	K	0	8	8	32,000	T	S	0	1	T	0	4				
3	8	K	0	9	0	32,000	T	S	0	1	T	0	4				
3	9	K	0	9	1	32,000	T	S	0	1	T	0	4				
4	0	K	0	9	3	32,000	T	S	0	1	T	0	4				
4	1	K	0	9	4	32,000	T	S	0	1	T	0	4				
4	2	K	0	9	5	32,000	T	S	0	1	T	0	4				
4	3	K	0	9	6	32,000	T	S	0	1	T	0	4				
4	4	K	0	9	7	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
4	5	K	0	9	8	32,000	T	S	0	1	T	0	4				
4	6	K	0	9	9	32,000	T	S	0	1	T	0	4				
4	7	K	1	0	0	32,000	T	S	0	1	T	0	4				
4	8	K	1	0	1	32,000	T	S	0	1	T	0	4				
4	9	K	1	0	2	32,000	T	S	0	1	T	0	4				
5	0	K	1	0	3	32,000	T	S	0	1	T	0	4				
5	1	K	1	0	4	32,000	T	S	0	1	T	0	4				
5	2	K	1	0	5	32,000	T	S	0	1	T	0	4				
5	3	K	1	0	6	32,000	T	S	0	1	T	0	4				
5	4	K	1	0	7	32,000	T	S	0	1	T	0	4				
5	5	K	1	0	8	32,000	T	S	0	1	T	0	4				
5	6	K	1	0	9	32,000	T	S	0	1	T	0	4				
5	7	K	1	1	0	32,000	T	S	0	1	T	0	4				
5	8	K	1	1	1	32,000	T	S	0	1	T	0	4				
5	9	K	1	1	2	32,000	T	S	0	1	T	0	4				
6	0	K	1	1	3	32,000	T	S	0	1	T	0	4				
6	1	K	1	1	4	32,000	T	S	0	1	T	0	4				
6	2	K	1	1	5	32,000	T	S	0	1	T	0	4				
6	3	K	1	1	6	32,000	T	S	0	1	T	0	4				
6	4	K	1	1	7	32,000	T	S	0	1	T	0	4				
6	5	K	1	1	8	32,000	T	S	0	1	T	0	4				
6	6	K	1	2	3	32,000	T	S	0	1	T	0	4				
6	7	K	1	2	4	32,000	T	S	0	1	T	0	4				
6	8	K	1	2	5	32,000	T	S	0	1	T	0	4				
6	9	K	1	2	6	32,000	T	S	0	1	T	0	4				
7	0	K	1	3	1	32,000	T	S	0	1	T	0	4				
7	1	K	1	3	2	32,000	T	S	0	1	T	0	4				
7	2	K	1	3	6	32,000	T	S	0	1	T	0	4				
7	3	P	0	0	1	32,000	T	S	0	1	T	0	4				
7	4	P	0	0	8	32,000	T	S	0	1	T	0	4				
7	5	P	0	1	2	32,000	T	S	0	1	T	0	4				
7	6	P	0	2	4	32,000	T	S	0	1	T	0	4				
7	7	P	0	3	9	32,000	T	S	0	1	T	0	4				
7	8	P	0	4	2	32,000	T	S	0	1	T	0	4				
7	9	P	0	4	6	32,000	T	S	0	1	T	0	4				
8	0	P	0	7	5	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
8	1	P	0	8	1	32,000	T	S	0	1	T	0	4				
8	2	P	1	0	8	32,000	T	S	0	1	T	0	4				
8	3	P	1	8	8	32,000	T	S	0	1	T	0	4				
8	4	U	0	0	1	32,000	T	S	0	1	T	0	4				
8	5	U	0	0	2	32,000	T	S	0	1	T	0	4				
8	6	U	0	0	3	32,000	T	S	0	1	T	0	4				
8	7	U	0	0	4	32,000	T	S	0	1	T	0	4				
8	8	U	0	0	5	32,000	T	S	0	1	T	0	4				
8	9	U	0	0	6	32,000	T	S	0	1	T	0	4				
9	0	U	0	0	7	32,000	T	S	0	1	T	0	4				
9	1	U	0	0	8	32,000	T	S	0	1	T	0	4				
9	2	U	0	0	9	32,000	T	S	0	1	T	0	4				
9	3	U	0	1	0	32,000	T	S	0	1	T	0	4				
9	4	U	0	1	1	32,000	T	S	0	1	T	0	4				
9	5	U	0	1	2	32,000	T	S	0	1	T	0	4				
9	6	U	0	1	4	32,000	T	S	0	1	T	0	4				
9	7	U	0	1	5	32,000	T	S	0	1	T	0	4				
9	8	U	0	1	6	32,000	T	S	0	1	T	0	4				
9	9	U	0	1	7	32,000	T	S	0	1	T	0	4				
0	0	U	0	1	8	32,000	T	S	0	1	T	0	4				
0	1	U	0	1	9	32,000	T	S	0	1	T	0	4				
0	2	U	0	2	0	32,000	T	S	0	1	T	0	4				
0	3	U	0	2	1	32,000	T	S	0	1	T	0	4				
0	4	U	0	2	2	32,000	T	S	0	1	T	0	4				
0	5	U	0	2	3	32,000	T	S	0	1	T	0	4				
0	6	U	0	2	4	32,000	T	S	0	1	T	0	4				
0	7	U	0	2	5	32,000	T	S	0	1	T	0	4				
0	8	U	0	2	6	32,000	T	S	0	1	T	0	4				
0	9	U	0	2	7	32,000	T	S	0	1	T	0	4				
1	0	U	0	2	8	32,000	T	S	0	1	T	0	4				
1	1	U	0	2	9	32,000	T	S	0	1	T	0	4				
1	2	U	0	3	0	32,000	T	S	0	1	T	0	4				
1	3	U	0	3	1	32,000	T	S	0	1	T	0	4				
1	4	U	0	3	2	32,000	T	S	0	1	T	0	4				
1	5	U	0	3	3	32,000	T	S	0	1	T	0	4				
1	6	U	0	3	4	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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	7	U	0	3	5	32,000	T	S	0	1	T	0	4				
1	8	U	0	3	6	32,000	T	S	0	1	T	0	4				
1	9	U	0	3	7	32,000	T	S	0	1	T	0	4				
2	0	U	0	3	8	32,000	T	S	0	1	T	0	4				
2	1	U	0	3	9	32,000	T	S	0	1	T	0	4				
2	2	U	0	4	1	32,000	T	S	0	1	T	0	4				
2	3	U	0	4	2	32,000	T	S	0	1	T	0	4				
2	4	U	0	4	3	32,000	T	S	0	1	T	0	4				
2	5	U	0	4	4	32,000	T	S	0	1	T	0	4				
2	6	U	0	4	5	32,000	T	S	0	1	T	0	4				
2	7	U	0	4	6	32,000	T	S	0	1	T	0	4				
2	8	U	0	4	7	32,000	T	S	0	1	T	0	4				
2	9	U	0	4	8	32,000	T	S	0	1	T	0	4				
3	0	U	0	4	9	32,000	T	S	0	1	T	0	4				
3	1	U	0	5	0	32,000	T	S	0	1	T	0	4				
3	2	U	0	5	1	32,000	T	S	0	1	T	0	4				
3	3	U	0	5	2	32,000	T	S	0	1	T	0	4				
3	4	U	0	5	3	32,000	T	S	0	1	T	0	4				
3	5	U	0	5	5	32,000	T	S	0	1	T	0	4				
3	6	U	0	5	6	32,000	T	S	0	1	T	0	4				
3	7	U	0	5	7	32,000	T	S	0	1	T	0	4				
3	8	U	0	5	8	32,000	T	S	0	1	T	0	4				
3	9	U	0	5	9	32,000	T	S	0	1	T	0	4				
4	0	U	0	6	0	32,000	T	S	0	1	T	0	4				
4	1	U	0	6	1	32,000	T	S	0	1	T	0	4				
4	2	U	0	6	2	32,000	T	S	0	1	T	0	4				
4	3	U	0	6	3	32,000	T	S	0	1	T	0	4				
4	4	U	0	6	4	32,000	T	S	0	1	T	0	4				
4	5	U	0	6	6	32,000	T	S	0	1	T	0	4				
4	6	U	0	6	7	32,000	T	S	0	1	T	0	4				
4	7	U	0	6	8	32,000	T	S	0	1	T	0	4				
4	8	U	0	6	9	32,000	T	S	0	1	T	0	4				
4	9	U	0	7	0	32,000	T	S	0	1	T	0	4				
5	0	U	0	7	1	32,000	T	S	0	1	T	0	4				
5	1	U	0	7	2	32,000	T	S	0	1	T	0	4				
5	2	U	0	7	3	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
5	3	U	0	7	4	32,000	T	S	0	1	T	0	4				
5	4	U	0	7	5	32,000	T	S	0	1	T	0	4				
5	5	U	0	7	6	32,000	T	S	0	1	T	0	4				
5	6	U	0	7	7	32,000	T	S	0	1	T	0	4				
5	7	U	0	7	8	32,000	T	S	0	1	T	0	4				
5	8	U	0	7	9	32,000	T	S	0	1	T	0	4				
5	9	U	0	8	0	32,000	T	S	0	1	T	0	4				
6	0	U	0	8	1	32,000	T	S	0	1	T	0	4				
6	1	U	0	8	2	32,000	T	S	0	1	T	0	4				
6	2	U	0	8	3	32,000	T	S	0	1	T	0	4				
6	3	U	0	8	4	32,000	T	S	0	1	T	0	4				
6	4	U	0	8	5	32,000	T	S	0	1	T	0	4				
6	5	U	0	8	6	32,000	T	S	0	1	T	0	4				
6	6	U	0	8	7	32,000	T	S	0	1	T	0	4				
6	7	U	0	8	8	32,000	T	S	0	1	T	0	4				
6	8	U	0	8	9	32,000	T	S	0	1	T	0	4				
6	9	U	0	9	0	32,000	T	S	0	1	T	0	4				
7	0	U	0	9	1	32,000	T	S	0	1	T	0	4				
7	1	U	0	9	2	32,000	T	S	0	1	T	0	4				
7	2	U	0	9	3	32,000	T	S	0	1	T	0	4				
7	3	U	0	9	4	32,000	T	S	0	1	T	0	4				
7	4	U	0	9	5	32,000	T	S	0	1	T	0	4				
7	5	U	0	9	6	32,000	T	S	0	1	T	0	4				
7	6	U	0	9	7	32,000	T	S	0	1	T	0	4				
7	7	U	0	9	8	32,000	T	S	0	1	T	0	4				
7	8	U	0	9	9	32,000	T	S	0	1	T	0	4				
7	9	U	1	0	1	32,000	T	S	0	1	T	0	4				
8	0	U	1	0	2	32,000	T	S	0	1	T	0	4				
8	1	U	1	0	3	32,000	T	S	0	1	T	0	4				
8	2	U	1	0	5	32,000	T	S	0	1	T	0	4				
8	3	U	1	0	6	32,000	T	S	0	1	T	0	4				
8	4	U	1	0	7	32,000	T	S	0	1	T	0	4				
8	5	U	1	0	8	32,000	T	S	0	1	T	0	4				
8	6	U	1	0	9	32,000	T	S	0	1	T	0	4				
8	7	U	1	1	0	32,000	T	S	0	1	T	0	4				
8	8	U	1	1	1	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
								(1) PROCESS CODES (Enter Code)									
8	9	U	1	1	2	32,000	T	S	0	1	T	0	4				
9	0	1	U	1	3	32,000	T	S	0	1	T	0	4				
9	1	U	1	1	4	32,000	T	S	0	1	T	0	4				
9	2	U	1	1	5	32,000	T	S	0	1	T	0	4				
9	3	U	1	1	6	32,000	T	S	0	1	T	0	4				
9	4	U	1	1	7	32,000	T	S	0	1	T	0	4				
9	5	U	1	1	8	32,000	T	S	0	1	T	0	4				
9	6	U	1	1	9	32,000	T	S	0	1	T	0	4				
9	7	U	1	2	0	32,000	T	S	0	1	T	0	4				
9	8	U	1	2	1	32,000	T	S	0	1	T	0	4				
9	9	U	1	2	2	32,000	T	S	0	1	T	0	4				
0	0	U	1	2	3	32,000	T	S	0	1	T	0	4				
0	1	U	1	2	4	32,000	T	S	0	1	T	0	4				
0	2	U	1	2	5	32,000	T	S	0	1	T	0	4				
0	3	U	1	2	6	32,000	T	S	0	1	T	0	4				
0	4	U	1	2	7	32,000	T	S	0	1	T	0	4				
0	5	U	1	2	8	32,000	T	S	0	1	T	0	4				
0	6	U	1	2	9	32,000	T	S	0	1	T	0	4				
0	7	U	1	3	0	32,000	T	S	0	1	T	0	4				
0	8	U	1	3	1	32,000	T	S	0	1	T	0	4				
0	9	U	1	3	2	32,000	T	S	0	1	T	0	4				
1	0	U	1	3	3	32,000	T	S	0	1	T	0	4				
1	1	U	1	3	4	32,000	T	S	0	1	T	0	4				
1	2	U	1	3	5	32,000	T	S	0	1	T	0	4				
1	3	U	1	3	6	32,000	T	S	0	1	T	0	4				
1	4	U	1	3	7	32,000	T	S	0	1	T	0	4				
1	5	U	1	3	8	32,000	T	S	0	1	T	0	4				
1	6	U	1	4	0	32,000	T	S	0	1	T	0	4				
1	7	U	1	4	1	32,000	T	S	0	1	T	0	4				
1	8	U	1	4	2	32,000	T	S	0	1	T	0	4				
1	9	U	1	4	3	32,000	T	S	0	1	T	0	4				
2	0	U	1	4	4	32,000	T	S	0	1	T	0	4				
2	1	U	1	4	5	32,000	T	S	0	1	T	0	4				
2	2	U	1	4	6	32,000	T	S	0	1	T	0	4				
2	3	U	1	4	7	32,000	T	S	0	1	T	0	4				
2	4	U	1	4	8	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
2	5	U	1	4	9	32,000	T	S	0	1	T	0	4				
2	6	U	1	5	0	32,000	T	S	0	1	T	0	4				
2	7	U	1	5	1	32,000	T	S	0	1	T	0	4				
2	8	U	1	5	2	32,000	T	S	0	1	T	0	4				
2	9	U	1	5	3	32,000	T	S	0	1	T	0	4				
3	0	U	1	5	4	32,000	T	S	0	1	T	0	4				
3	1	U	1	5	5	32,000	T	S	0	1	T	0	4				
3	2	U	1	5	6	32,000	T	S	0	1	T	0	4				
3	3	U	1	5	7	32,000	T	S	0	1	T	0	4				
3	4	U	1	5	8	32,000	T	S	0	1	T	0	4				
3	5	U	1	5	9	32,000	T	S	0	1	T	0	4				
3	6	U	1	6	0	32,000	T	S	0	1	T	0	4				
3	7	U	1	6	1	32,000	T	S	0	1	T	0	4				
3	8	U	1	6	2	32,000	T	S	0	1	T	0	4				
3	9	U	1	6	3	32,000	T	S	0	1	T	0	4				
4	0	U	1	6	4	32,000	T	S	0	1	T	0	4				
4	1	U	1	6	5	32,000	T	S	0	1	T	0	4				
4	2	U	1	6	6	32,000	T	S	0	1	T	0	4				
4	3	U	1	6	7	32,000	T	S	0	1	T	0	4				
4	4	U	1	6	8	32,000	T	S	0	1	T	0	4				
4	5	U	1	6	9	32,000	T	S	0	1	T	0	4				
4	6	U	1	7	0	32,000	T	S	0	1	T	0	4				
4	7	U	1	7	1	32,000	T	S	0	1	T	0	4				
4	8	U	1	7	2	32,000	T	S	0	1	T	0	4				
4	9	U	1	7	3	32,000	T	S	0	1	T	0	4				
5	0	U	1	7	4	32,000	T	S	0	1	T	0	4				
5	1	U	1	7	6	32,000	T	S	0	1	T	0	4				
5	1	U	1	7	7	32,000	T	S	0	1	T	0	4				
5	3	U	1	7	8	32,000	T	S	0	1	T	0	4				
5	4	U	1	7	9	32,000	T	S	0	1	T	0	4				
5	5	U	1	8	0	32,000	T	S	0	1	T	0	4				
5	6	U	1	8	1	32,000	T	S	0	1	T	0	4				
5	7	U	1	8	2	32,000	T	S	0	1	T	0	4				
5	8	U	1	8	3	32,000	T	S	0	1	T	0	4				
5	9	U	1	8	4	32,000	T	S	0	1	T	0	4				
6	0	U	1	8	5	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
6	1	U	1	8	6	32,000	T	S	0	1	T	0	4				
6	2	U	1	8	7	32,000	T	S	0	1	T	0	4				
6	3	U	1	8	8	32,000	T	S	0	1	T	0	4				
6	4	U	1	8	9	32,000	T	S	0	1	T	0	4				
6	5	U	1	9	0	32,000	T	S	0	1	T	0	4				
6	6	U	1	9	1	32,000	T	S	0	1	T	0	4				
6	7	U	1	9	2	32,000	T	S	0	1	T	0	4				
6	8	U	1	9	3	32,000	T	S	0	1	T	0	4				
6	9	U	1	9	4	32,000	T	S	0	1	T	0	4				
7	0	U	1	9	6	32,000	T	S	0	1	T	0	4				
7	1	U	1	9	7	32,000	T	S	0	1	T	0	4				
7	2	U	2	0	0	32,000	T	S	0	1	T	0	4				
7	3	U	2	0	1	32,000	T	S	0	1	T	0	4				
7	4	U	2	0	2	32,000	T	S	0	1	T	0	4				
7	5	U	2	0	3	32,000	T	S	0	1	T	0	4				
7	6	U	2	0	4	32,000	T	S	0	1	T	0	4				
7	7	U	2	0	5	32,000	T	S	0	1	T	0	4				
7	8	U	2	0	6	32,000	T	S	0	1	T	0	4				
7	9	U	2	0	7	32,000	T	S	0	1	T	0	4				
8	0	U	2	0	8	32,000	T	S	0	1	T	0	4				
8	1	U	2	0	9	32,000	T	S	0	1	T	0	4				
8	2	U	2	1	0	32,000	T	S	0	1	T	0	4				
8	3	U	2	1	1	32,000	T	S	0	1	T	0	4				
8	4	U	2	1	3	32,000	T	S	0	1	T	0	4				
8	5	U	2	1	4	32,000	T	S	0	1	T	0	4				
8	6	U	2	1	5	32,000	T	S	0	1	T	0	4				
8	7	U	2	1	6	32,000	T	S	0	1	T	0	4				
8	8	U	2	1	7	32,000	T	S	0	1	T	0	4				
8	9	U	2	1	8	32,000	T	S	0	1	T	0	4				
9	0	U	2	1	9	32,000	T	S	0	1	T	0	4				
9	1	U	2	2	0	32,000	T	S	0	1	T	0	4				
9	2	U	2	2	1	32,000	T	S	0	1	T	0	4				
9	3	U	2	2	2	32,000	T	S	0	1	T	0	4				
9	4	U	2	2	3	32,000	T	S	0	1	T	0	4				
9	5	U	2	2	5	32,000	T	S	0	1	T	0	4				
9	6	U	2	2	6	32,000	T	S	0	1	T	0	4				

9. Description of Hazardous Wastes ***(Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)***

Line Number		A. EPA Hazardous Waste No. (Enter code)				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)
9	7	U	2	2	7	32,000	T	S	0	1	T	0	4				
9	8	U	2	2	8	32,000	T	S	0	1	T	0	4				
9	9	U	2	3	4	32,000	T	S	0	1	T	0	4				
0	0	U	2	3	5	32,000	T	S	0	1	T	0	4				
0	1	U	2	3	6	32,000	T	S	0	1	T	0	4				
0	2	U	2	3	7	32,000	T	S	0	1	T	0	4				
0	3	U	2	3	8	32,000	T	S	0	1	T	0	4				
0	4	U	2	3	9	32,000	T	S	0	1	T	0	4				
0	5	U	2	4	0	32,000	T	S	0	1	T	0	4				
0	6	U	2	4	3	32,000	T	S	0	1	T	0	4				
0	7	U	2	2	4	32,000	T	S	0	1	T	0	4				
0	8	U	2	4	6	32,000	T	S	0	1	T	0	4				
0	9	U	2	4	7	32,000	T	S	0	1	T	0	4				
1	0	U	2	4	8	32,000	T	S	0	1	T	0	4				
1	1	U	2	4	9	32,000	T	S	0	1	T	0	4				
1	2	U	2	7	9	32,000	T	S	0	1	T	0	4				
1	3	U	3	5	9	32,000	T	S	0	1	T	0	4				
1	4	U	4	0	9	32,000	T	S	0	1	T	0	4				
1	5	U	4	1	1	32,000	T	S	0	1	T	0	4				

10. 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.

11. Facility Drawing

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

12. 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).

13. Comments

Item 8, Line Number 3: The process is solids bulking
Item 8, Line Number 4: The process is liquids bulking
Item 8, Line Number 5: The process is solids & liquid blending in roll-off box at bulking pad
Item 8, Line Number 6: The process is solids stabilization in roll-off box at bulking pad
Item 10: A new Topographic map has been included.
Item 11: No new facility drawings included. Resubmitted Figures 2-6 from previous application. No proposed changes to the original facility drawings.
Item 12: No new photographs included. Resubmitted photos from previous application. No significant changes have occurred.

SECTION B

FACILITY DESCRIPTION

B-1 GENERAL DESCRIPTION

EQ Alabama, Inc. operates a hazardous waste storage, transfer, and treatment facility at Mile Marker 250 on Alabama Highway 17 North in Sulligent, Alabama. The latitude and longitude for the facility are 33.847790 N and 88.112814 W.

On June 17, 2014, US Ecology, Inc. acquired 100% of the stock of EQ Parent Company, Inc. who is the indirect parent corporation of EQ Holdings, Inc. EQ Alabama, Inc. is one of several wholly owned subsidiaries of EQ Holdings, Inc. Due to its ownership of EQ Parent's stock, US Ecology is now the indirect parent of EQ Alabama, Inc. EQ Alabama, Inc. maintains its separate corporate existence as a wholly owned subsidiary of EQ Holdings, Inc. As such, EQ Alabama, Inc. remains the legal name of the business unit. For marketing and internal purposes the facility is also referred to as US Ecology Sulligent and may receive some local branding and signage to indicate this.

EQ Alabama, Inc. (EQAL) facility receives hazardous and non-hazardous wastes from numerous sources and stores and/or treats this waste material prior to eventual shipment to several treatment and/or disposal facilities. The facility receives waste from off-site generators in pails, kegs, drums, boxes, totes, roll-off containers, and dump trailers delivered by box vans roll-off rail truck, and tractor.

The facility contains five Solid Waste Management Units including a Container Storage Building, a Roll-Off Pad, a Bulking Pad, a former Liquids Bulking Area (no longer active), and a loading dock. Three Areas of Concern (AOC) were identified during previous RCRA Facility Assessments (RFA). All three of these areas have been remediated. They are as are as follows:

1. Areas of stained soils in the grubbed area near the discharge points for roll-off pad.

   This area has been filled and the drainage way has been improved with concrete channeling.

2. Discolored area in drainage for gravel yard near bulking pad.

   Soil and gravel taken from this area was analyzed and determined to be non-hazardous.

3. A Concrete pad (approximately 2 foot square) located south and west of the roll-off storage pad.

   The origin of this piece of concrete is unknown. The most likely origin that can be determined is that the material is additional concrete left over when the concrete channeling system was poured to improve drainage to the south and west of the facility. Nothing was found under the slab and the slab has been removed and placed in a roll- off along with debris generated by destruction of the Bulking Pad.

The facility is designed to accept solid hazardous waste with free liquids and liquid hazardous wastes, including ignitable liquids, in non-bulk containers and totes and solid hazardous wastes without free liquids in non-bulk containers, totes, bags, roll-off containers, and dump trailers. Upon receipt the facility may bulk solid hazardous wastes without free liquids with like waste codes from non-bulk containers and totes into roll-off containers or from roll-offs into 55 gallon drums or smaller fiber drums. The facility also provides for bulking of liquid hazardous wastes, including ignitable liquids, from non-bulk containers and totes into a vacuum truck container. EQAL will only consolidate compatible waste streams that meet the specifications of the facilities that will accept the waste.

The facility will combine solid and liquid wastes in roll-off containers at the bulking pad such that solid wastes absorb the liquids and no free liquids remain after mixing. Wastes will remain in the roll-off container and be staged on the roll-off pad for shipment to a disposal facility.

Suitable solid wastes and stabilizing agents will be combined in roll-off containers at the bulking pad to immobilize contaminants and render the final waste applicable for land disposal. Wastes will remain in the roll-off container and be staged on the roll-off pad for shipment to a disposal facility.

The EQ Alabama operation serves many industrial and commercial generators including wood preserving, fuel blending, pulp and paper, contaminated UST clean ups, and many retail operations. The facility is also designed to accept materials containing PCBs.

The entire site area consists of approximately 9.25 acres while the current actively used portion of the facility consists of approximately 2 acres and is located within the fenced area as shown on Figure 2 located in the Figures section of this application. The site consists primarily of three structures. The Container Storage Building includes office space, two shipping/receiving docks, the bulking pad, and an external roofed storage/staging area. There also are two portable "Strickland" buildings one used for supply storage and the other as a break room. The site also contains one large uncovered concrete Roll-Off Storage Pad.

B-2 TOPOGRAPHIC MAP

B-2a General Requirements

A topographic map showing the facility at a scale of 1”=200’ is labeled Figure 1 and is located in the Figures Section of this application.

A facility diagram showing the facility at a scale of 1" = 100' is labeled Figure 2 and also located in the Figures Section of this application. The following location information is provided in accordance with paragraph 14-8-.02(5)(b)19 of the Alabama Department of Environmental Management Administrative Code.

The following information is included either on Figure 1 or Figure 2. The location of the information is included after each entry.

(I) Map scale and Date:
- Figure 1, and Figure 2

(II) 100 year floodplain: No area on this map falls within the 100 year floodplain. This information was collected from the Federal Emergency Management Administration's National Flood Insurance Map, Community Panel Number 010271 01508, effective date - June 4, 1990.

(Ill) Surface waters and streams are all marked.
– Figure 1

(IV) Surrounding land use – The land around the facility consists of some residential dwellings to the north and south of the facility on Hwy 17. The land to the east of the facility consists mostly of timber land and the area to the west of the facility directly across Hwy 17 is the Lamar County Airport. The center of the town of Sulligent is located approximately four miles north of the facility.

(V) Wind rose information was compiled from Columbus Air Force Base, Columbus, Mississippi. Calculations and diagram are attached in the Appendix to this section.

(VI) North Arrow is identified; map is oriented so that North is at the top.
– Map A, Figure 1, and Figure 2

(VII) Legal boundaries are identified. (See map symbols).
– Map A, Figure 1, and Figure 2

(VIII) Fences and gates are marked. (See map symbols).
-fences are included on and Figure 1, Figure 2 includes fences and gates.

(IX) No injection wells are located on the map. Withdrawal wells are water wells and marked accordingly.
– Figure 1 and Figure 2

(X). Buildings, storage operations, loading and unloading docks, roads, and sewage systems are all marked.
- Figure 2

(XI) Drainage ditches are all marked.
-Figure 1 and Figure 2

(XII) Specific locations of Hazardous Waste Storage are marked.
- Figure 1 and Figure 2 B-2b

Additional Topographic Requirements

Since this operation is a containerized storage facility ONLY, these requirements are not applicable.

B-3 LOCATION INFORMATION

B-3a Seismic Considerations

Considerations of seismic conditions are not required by the Alabama Department of Environmental Management Administrative Code R.335- 14-5 "Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities".

B·3b Floodplain Standard

No area on the maps included with this application falls within the 100 year floodplain. This information was collected from the Federal Emergency Management Administration's National Flood Insurance Map) Community Panel Number 010271 01509, effective date - June 4, 1990. (See Appendix to this section).

B-3b(1) Demonstration of Compliance

Since this facility is not located within the 100 year floodplain, this section is not applicable.

B-3b{2) Plan for Future Compliance with Floodplain Standard

Since this facility is not located within the 100 year floodplain, this section is not applicable.

B-3b(3) Waiver for Land Storage and Disposal Facilities

Since this facility is not located within the 100 year floodplain, this section is not applicable.

B-4 Traffic Information

Movement of wastes inside the confines of the facility is done either by tractor truck, yard truck, vacuum truck, box van, fork truck (standard forklift), or pallet jacks. Semi-trailer trucks move drums, totes, and roll-off containers into and out of the facility and to and from major points within the

facility. Forklift trucks are used to move drums and totes to and from semi-trailers into and out of the container storage building. Forklift trucks will also be used to move liquid wastes to the proposed liquid bulking area within the existing container storage building.

All vehicles enter the facility by turning east off Alabama Highway 17 North through the sliding gate at the south end of the parking lot; however, the proposed vacuum truck will enter the facility through the sliding gate located at the north end of the parking lot. Once inside the facility, they are directed to either the container storage building, liquid bulking area, or the roll-off container storage area. The estimated average volume of traffic is 5 semi-trailer trucks per day and 1 vacuum truck every two months. Traffic control is performed by the process operators located in the container storage building. The traffic pattern is shown on Figure 2 located in the Figures Section of this application.

The access road to this facility is Alabama Highway 17 North. This is a four lane, bituminous asphalt surfaced highway with the load bearing capacity typical of "state" highways in Alabama.

The roadways and drives inside the facility are constructed of compacted stone. They are sufficient to support the weight of vehicles without causing damage to the roadway surface.

SECTION C
WASTE CHARACTERISTICS

C-1 CHEMICAL & PHYSICAL ANALYSES

Pre-Acceptance Procedures

The pre-acceptance procedure is the mechanism for deciding to reject or accept a particular type of waste, prior to shipment to the facility, based on the conditions or limitations of existing permits, applicable land disposal restrictions, and its compatibility with other with other wastes being treated and/or stored at the facility.

Before EQ Alabama, Inc. (EQAL) accepts any hazardous waste for storage or treatment, the generator will provide EQAL with a completed Waste Profile form. An example of the current version of the Waste Profile form is located in Appendix I to Section C. EQAL will use this form or its equivalent revision. The completed profile provides the following information:

- General Information
- Physical Characteristics
- Chemical/Physical Composition
- Characteristic Constituents
- Reactivity and Other Hazards
- Hazardous Characterization
- Shipping Information
- Generator's Certification (signed by authorized generator representative)

At a minimum the generator supplies all the information needed to treat, store, or dispose of the waste as required by the regulation. The generator will provide EQAL with other supporting documentation, which may include Safety Data Sheets (SDS), laboratory analysis, and any information concerning Land Disposal Restrictions (LDR) that may apply to the waste. A current copy of the EQAL Land Disposal Restriction form is located in Appendix I of this section. Either this form or its revised equivalent will be used by EQAL for shipments leaving its facility. The generator will also provide EQAL with a representative sample, if requested, for evaluation.

EQAL will review information presented on the Waste Profile form and all other applicable documentation provided by the generator for:

- Completeness
- Process Producing the Waste

- Analytical Results
- Chemical Constituents
- Land Disposal Restriction Requirements

EQAL will determine the acceptability of the waste based on:

- The permit conditions for the facility
- The facility operational requirements
- The compatibility of the waste for storage or treatment
- The status of the waste under current Land Disposal Restrictions
- Availability of on-site treatment capabilities
- Availability of off-site recycling, reclamation, treatment, or disposal options

When the profile has been reviewed and found to be acceptable for the EQAL facility the waste will be assigned a profile number. When approved, the generator will be sent an approval notification. The letter will contain the assigned profile number, any restrictions, and the expiration date of the approval.

Profile approvals will be valid for a maximum of one (1) year. An approval may be renewed by the submission of a generator signed Re-Approval Notice. A copy of the current Re-Approval Notice form is located in Appendix I to Section C. This form or its revised equivalent will be used to complete the annual approval renewal process.

An Approval may be rescinded by EQAL at any time if:

(1) The EQ Alabama, Inc. permit changes;

(2) Regulations or requirements for the waste change;

(3) The material appears to be different from the profile, and the differences cannot be resolved.

Any analyses required or used to complete the profile will be conducted in accordance with SW-846 and 40 CFR Part 261, ADEM Admin. Code Chapter 335-14-2 and their future additions.

When a profile number is assigned to the waste, the approvals coordinator or their designee will maintain any additional documents provided by the generator such as Safety Data Sheets, laboratory data, technical specifications sheets, and any other relevant documents used to determine the characteristics of the waste and place them with the profile for use by facility staff.

The previous chemical analysis may include data developed under 40 CFR 261 and ADEM Admin. Code Chapter 335-14-2 and existing published data on the hazardous waste or on hazardous waste generated from similar processes.

C-1 a Containers

The generator must package wastes in compatible containers in accordance with 49 CFR Parts 173, 178 and 179.

- Strong corrosives should be placed in plastic drums.

- Seals on roll-offs should be tight and liners must be used.

- Leaking drums will be over-packed and shipped to the designated treatment facility in the over-pack at the generator's expense.

- Liquid PCBs will not be accepted in any container with a volume greater than 55 gallons or as specified under 40 CFR 761.

- Containers with free liquids will be stored within secondary containment as described at Section D-1 and routinely inspected as outlined at Section F-2.

- Incompatible wastes will be stored where distance and isolation berms can keep the materials from contact.

C-1 b Tanks

There are no tanks used as waste management units at EQAL.

C-1c Waste Piles

Waste piles are not utilized at EQAL.

C-1d Incineration

No material is incinerated or thermally treated at EQAL.

C-le Landfills

EQAL is not a landfill; however, a Land Disposal Restriction Notification/Certification (LDR) must accompany hazardous waste shipments to many of the treatment facilities designated as final destination by generators using the EQAL storage facility. It is the generator's responsibility to provide such a form and any other required forms which must accompany their Hazardous Waste Manifest. An example LDR, which may be used, is provided in Appendix I to Section C.

C-1f Land Treatment

There are no land treatment units in use at EQAL.

C-1g Boilers and Industrial Furnaces

There are no boilers or industrial furnaces in use at EQAL.

C-2 WASTE ANALYSIS PLAN

See the Waste Analysis Plan located at the end of this section. This plan includes elements that cover Sections C-2a, C-2b, C-2c, and C2-d

C-2e Additional Requirements Pertaining to Boiler/Industrial Furnaces

There are no Boilers or Industrial Furnaces at EQAL.

C-2f Additional Requirements for Waste Generated Offsite

The previous sections on Pre-Acceptance and the Waste Analysis Plan address this.

C-2g Additional Requirements for Ignitable, Reactive, or Incompatible Waste

Utilizing information gathered from the profile and pre-acceptance testing, EQAL will take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste will be separated and protected from sources of ignition or reaction including but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. EQAL prohibits smoking and open flame, except in the designated smoking area, on the site. "No Smoking" signs are conspicuously placed.

EQAL will also take precautions to prevent reactions which:

-Generate extreme heat or pressure, fire or explosions or violent reactions;

-Produce uncontrolled toxic mists, fumes, dust, or gases in sufficient quantities to threaten human health or the environment;

-Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

-Damage the structural integrity of the device or facility;

-Through other like means threaten human health or the environment.

Under no circumstances will dissimilar wastes be mixed together in the same container. Bulking of wastes with no free liquids will only be done with containers identified as having like waste codes. Bulking of liquid wastes will only be done with compatible waste streams that meet the specifications of the facility that will accept the wastes. The consolidated liquid waste will carry all of the waste codes from the individual containers pursuant to the mixture rule. Prior to bulking, EQAL will confirm all waste codes to be bulked can be received at the final treatment/disposal facility under their environmental permits.

C-3 Land Disposal Restrictions

A Land Disposal Restriction Form, copy provided in Appendix I of Section C, or its equivalent, will be obtained from the generator as required and placed in the Waste Profile record. EQAL will also provide its version of a completed LDR form to final treatment or disposal facilities that receive the waste.

The Waste Analysis Plan provides for additional analytical evaluation (to address C-3b) and records for wastes that will be treated at EQAL through the stabilization process. The analytical data and supporting documentation will be maintained with the outbound waste profile.

WASTE ANALYSIS PLAN

EQ ALABAMA, INC.

Highway 17 North
SULLIGENT, LAMAR COUNTY, ALABAMA
ALD 983 177 015

Revision 04-April 30, 2015

WASTE ANALYSIS PLAN
EQ ALABAMA, INC.
Highway 17 North
SULLIGENT, LAMAR COUNTY, ALABAMA
ALD 983 177 015

This Waste Analysis Plan (WAP) has been prepared for EQ Alabama, Inc. (EQAL) pursuant to the Alabama Department of Environmental Management (ADEM) Administrative Code Rule 335-14-5-.02(4). This WAP prescribes detailed procedures that will be followed by EQAL to obtain the information required to store hazardous and non-hazardous waste and to obtain any additional information necessary for treatment of hazardous and non-hazardous waste prior to disposal off-site.

This WAP has been developed by grouping similar waste streams into Waste Categories based on review of constituents for which the wastes are listed and consideration of implications of the Land Disposal Restrictions including treatment standards for specific constituents and technology based standards for certain listed waste codes.

The plan is designed to outline procedures that will be used at EQAL to inspect and analyze wastes received at the facility to ensure that it matches the profile sheet, the pre-acceptance waste description and the manifest. The plan is divided into three major sections:

I. Waste Identification Procedures
II. Collection of Representative Samples
III. Analytical Rationale

I. Waste Identification Procedures

A. Pre-Acceptance Criteria

EQ Alabama, Inc. (EQAL) receives hazardous and non-hazardous wastes from off-site generators for the purpose of storage and/or treatment prior to final disposal at off-site disposal facilities. Before EQAL can receive a particular waste, the generator will supply EQAL with detailed knowledge about the waste, the process that is generating the waste, and by completing a Waste Profile form (example located in Appendix 1 to Section C) for each waste stream. If the waste is a characteristic hazardous waste, the generator will also be required to submit a Waste Profile and the results of analysis for toxicity, ignitability, corrosivity and reactivity and/or a certification that describes which characteristic analyses were not performed and their supporting rationale.

The generator will often be required to submit a representative sample of the waste to EQAL along with the Waste Profile form. EQAL may analyze the waste for parameters outlined in Appendix III, Table 2 of this plan. If results of sample analyses correlate reasonably with the profile sheet and generator supplied data, EQAL will provide an assigned Approval Number to reference the waste stream from that generator. The Waste Profile form and other data or documents supplied by the generator and any data developed by EQAL will be placed in the profile record.

The assigned approval will be valid for one year unless the process generating the waste changes. The generator will recertify the waste and its generating process annually by completing a Re-Approval Notice. EQAL may require a recertification from the generator at any time based on the following criteria:

1. At least annually for all hazardous waste streams and biennially for all nonhazardous waste streams.
2. When EQAL is notified, or has reason to believe, that the process or operation generating the waste has changed.
3. When the results of confirming evaluations conducted for the incoming waste load indicates the waste received at EQAL does not match the waste designated on the accompanying manifest or the Material Profile Sheet.
4. At the discretion of EQAL to protect EQAL's operation.
5. If the EQAL permit or the regulations for the waste changes

Following the pre-acceptance analysis process, demonstrating that a candidate waste meets the requirements for storage or treatment at EQAL, the waste may be accepted for receipt by the facility supervisor or their designee. EQAL reserves the right to reject any candidate waste to protect its personnel, facility, or the environment.

B. Waste Receiving Procedures

Waste shipments received at EQAL will be managed in accordance with the waste receiving procedures described in this section. The objectives of the waste receiving procedures are as follows:

1. To ensure that all wastes received at EQAL have been previously approved in agreement with Section I.A. of this plan, Waste Identification Procedures, Pre-Acceptance Criteria.
2. To ensure that the waste received matches the identity of the waste described on the accompanying manifest and the Waste Profile Form.
3. To ensure that the waste is received and stored in compliance with ADEM requirements.

The facility receives and stores and treats hazardous and non-hazardous wastes. Waste received and accepted for storage at EQAL can be bulk solids, sludge, and liquids or non-bulk solids, sludge or liquids. Bulk liquids are received only in totes. Bulk solids, without free liquids, are typically received in roll-off boxes. Waste containers of solids, sludge or liquids are normally received by box van. There are two separate unloading areas at EQAL; the roll-off box storage pad and the container loading dock. The facility provides segregated storage for roll-off and smaller containerized waste. Incompatible wastes will not be commingled during transfers or storage. Upon arrival of a waste load at EQAL, the following procedure is initiated:

1. The driver will take the inbound shipping documents to the office, the manifest and/or bill of lading will be kept in the office. Copies will be generated for use in the receiving or processing areas.

2. Each waste shipment will be inspected. Containers and labels will be inspected and a container count will be obtained and compared to the manifest. The process operator will identify any obvious discrepancies which can be discovered by inspection.

Examples of such discrepancies are:

- For containerized waste, any variation in piece count, such as a discrepancy of one drum,
- For bulk waste, variations greater than 10% in weight;
- labeling that does not match the profile;
- incomplete manifest; and
- waste that arrives without a waste approval.

If the discrepancy is physical, (i.e. variation in piece count or weight), or administrative, (i.e. incomplete manifest or labels that don't match the manifest), EQAL will discuss the discrepancy with the generator and/or the transporter. If a physical or administrative discrepancy cannot be resolved, EQAL will not accept the waste. The load will be rejected in full or in part using standard Universal Waste Manifest procedures.

3. Provided that the discrepancy can be resolved, EQAL will sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received. The waste containers will be unloaded into the Pre-Acceptance staging area (Rows 10 and 11) for sampling and analyses. The transporter will be given one copy of the signed manifest and released after the wastes are unloaded.

4. The EQAL process operator will record the date, arrival time, and transporter in the shipping/receiving record.

5. When the process operator receives verbal approval from the facility supervisor the appropriate personal protective equipment (PPE) will be donned and the shipment sampled for comparison with the profile and manifest. Sampling procedures are described in Section II. Samples will be analyzed for parameters outlined in Section Ill.

6. When the results of the analyses are obtained, they are entered into the record and compared to the Waste Profile record for acceptance.

If there is a discrepancy that indicates that the waste is not the same waste that was profiled to the facility and the discrepancy cannot be resolved within 15 days, the wastes will be returned to the generator, subjected to further analyses, or the manifest may be revised with generator approval. The generator will be contacted and notified immediately of the probable discrepancy. If the generator is uncooperative, the shipment will be returned to the generator by rejecting the shipment.

In the event additional analyses are required or discrepancies cannot be reconciled within 15 days, containers with no free liquids will be loaded onto a trailer and the trailer will be spotted temporarily on the roll-off pad (Southeastern corner of property) until the results of the additional analyses are received or the discrepancy is reconciled. Containers that do contain free liquids will remain in the Container Storage Building in the EQAL Pre-Acceptance staging area (Rows 10 and 11) for sampling and analyses until the results of the additional analyses are received or the discrepancy is reconciled. Any discrepancies are subject to be rejected and returned to the generator.

Note: If the discrepancy cannot be resolved within 15 days of receiving the waste, EQAL will submit a letter to ADEM with a copy of the manifest describing the discrepancy and attempts to reconcile it.

7. Once the shipment has been accepted for receipt into storage, the wastes will be transferred to an appropriate storage location.

8. Within 30 days after delivery of the waste to EQAL, the facility will return a signed copy of the manifest to the generator.

II. Collection of Representative Samples

A. Sampling Strategy

Each container of non-retail waste received will be sampled and a composite sample, based on volume, of the same waste stream from the same generator will be collected for up to 10 drums or roll-offs from the same waste stream, (i.e. a waste with 15 drums will have 2 samples, 1 sample-10 drums, 1 sample- 5 drums), in accordance with ADEM Administrative Code Rule 335-14-5-.02(4)(c) & (d).

B. Sample Procedures

Representative sampling procedures will be based on guidelines outlined in the American Society of Testing and Materials (ASTM) as follows:

Extremely Viscous liquid -	D140-70
Crushed or powdered material	D346-75
Soil or rock-like material	D420-69
Soil-like material	D1452-65
Fly-ash like material	D2234-76

Copies of these methods are kept in the EQAL Standard Operating Procedure Manual. The methods and equipment used for sampling materials received will vary with the physical state and consistency of the materials to be sampled. Samples collected using the methods described below, and for samples of materials with properties similar to the indicated material will be considered representative of the waste.

1. Containerized Liquid Waste

A 'COLIWASA' type sampler will be used for drums with liquid waste. The COLIWASA will allow the technician collecting the samples to collect a sample representative of the full depth of liquid in the drum and to observe layering of the sample. If solids or sludge have accumulated in the bottom of a drum, a 4-foot long plastic tube with a diameter of ½"-inch or less will be used. A rubber stopper will be placed in the top of the tube to retrieve the sample. If a sample of the solids cannot be obtained by this method, a sample will be retrieved using a glass jar attached to a rod. The sample technician will have to adjust the jar and rod to fill the container with solids. The solid/sludge phase and liquid phase will be composited proportionally for analysis.

2. Containerized Sludge and Solid Waste

A thief sampler or trier will be used to sample those solids and sludge that are penetrable. Those that are monolithic will be sampled with an auger or by chipping and scrapping.

Table 4-1
SAMPLING METHODS AND EQUIPMENT

Material	Method	Equipment	Sample Container
Extremely viscous	ASTM D140-70, E300 (a)	Tubing (b) or thief	Plastic/Glass jar w/screw top
Crushed or powdered material	ASTM D364–75, E300 (a)	Tubing (b), trier, scoop, or shovel	Plastic/Glass jar w/screw top
Soil material	ASTM D420-69, E300 (a)	Tubing (b), trier, auger, scoop, or shovel	Plastic/Glass jar w/screw top
Soil-like material	ASTM D1462.65, E300 (a)	Tubing (b), trier, auger, scoop, or shovel	Plastic/Glass jar w/screw top
Fly ash-like material	ASTM D2234–76 (a)	Tubing (b), trier, auger, scoop, or shovel	Plastic/Glass jar w/screw top
Containerized Liquids	SW–846 (c) ASTM E300 (a)	Coliwasa or tubing (b) or sampling rod	Plastic/Glass jar w/screw top

NOTES:
(a) ASTM International. Annual Book of ASTM Standards. Philadelphia, PA. 1982 or most recent edition.
(b) Personal Protection and Safety Training Manual (Cincinnati, OH: USEPA National Training and Operational Technology Center 1981), pp. 3-1 and 3-4.
(c) U.S. Environmental Protection Agency. SW-846-Test Methods for Evaluating Solid Waste. Office of Solid Waste and Emergency Response, Washington, D.C., Third Edition 2009 or most recent edition.

Liquids in large containers are sampled with a Coliwasa, tubing, or sample rod to obtain a vertical section. A composite sample is obtained by taking equal volumes from each applicable port and mixing in a common container. Light, dry powders, granules and heavier solids are sampled by trier or shovel, or by coring with heavy tubing or an auger.

3. Bulk Sludge and Solid Waste

Samples will be collected from roll-off containers by first removing the tarp that covers the container. A visual inspection of the contents of the waste will be performed. If the waste appears to be consistent, (i.e. 100% soil), a composite sample will be collected from the roll-off container. If the sample matrix varies, (i.e. 80% soil, 20% concrete), a composite sample will be collected that is proportional to the waste in the roll-off container. Samples will be collected from varying depths and locations within the roll-off container. A minimum of four grab samples will be collected for each composite sample. Samples collected from roll-off containers with like waste codes from the same generator will be composited further in the laboratory.

4. Lab Packs

Lab packs will be opened to verify that the waste materials itemized on the manifest match the actual contents of the lab pack. If the individual containers still have original manufacturer's labels intact, and the label matches the manifest description, sampling is not required.

5. Special Wastes

a. Asbestos-Containing Materials

EQAL may be requested to store some construction debris that contains asbestos. These wastes will be subjected to physical inspection only to verify that the wastes are as described on the manifest or shipping papers.

b. Batteries

EQAL may accept automotive batteries for storage. If automotive batteries are accepted on a pallet that is "shrink-wrapped" EQAL will observe the pallet and the batteries to verify that the pallet is in good condition and that the batteries are not leaking. EQAL may also accept a 55-gallon drum with household type batteries. The container will have to be lined with a drum-liner that is compatible with the acid. EQAL will not accept batteries if the containers are not in good condition.

c. PCB-Contaminated Materials

EQAL will obtain a written certification from the original generator of the waste that attests to the concentrations of PCBs in the source of contamination. These wastes will be subject to a PCB screen and any other analysis required by other waste codes that may be present. Waste materials that contain PCBs only (i.e. transformer fluids, PCB Articles and PCB equipment) will be subject to a PCB screen only.

C. Internal Recordkeeping

A sample tag with an identification number (i.e. 1, 2, 3, etc.) will be placed on each container. [Note: Sample tags will be reused as necessary]. A sample will be collected from each waste container and placed into a 9 oz. glass jar and sealed with a lined lid. The sample will be labeled with the sample identification number (Inbound

Receipt Number, Date Received, and Waste Codes) assigned to the waste container. The generators name, the Waste Profile number, the Hazardous Waste Code(s), the date and time of sample collection and the sample tag number will be documented in the log book. Only samples from the same generator waste stream will be composited. Waste codes from different generators will not be composited. All samples will be transported to the laboratory. The laboratory technician will composite up to 10 samples from any waste stream by making a weight-proportional or a volume-proportional composite. The resultant composite sample should be of sufficient weight or volume to complete the entire suite of parameters outlined in Section III. The laboratory technician will record in his log book the specific samples used to make each composite sample and the weight of each sample used to form the composite. The log books maintained by the process operator eliminate the necessity for a chain-of-custody for samples to be analyzed at EQAL. Chain-of-Custody is required to document that the samples have been preserved and handled properly and that samples have not been altered. Because the waste samples will be collected at the EQAL facility and taken directly into the on-site laboratory, Chain-of-Custody forms are not required for samples that remain at EQAL. Samples that may be sent to an off-site laboratory will be accompanied by a Chain-of-Custody with specific analysis requirement details. All waste samples will be returned to the waste container they came from.

III. Analytical Rationale

Analyses are performed on selected incoming waste by EQAL to verify conformance with the approved Waste Profile. Analytical methods are classified as “Fingerprint Analyses,” “Additional Analyses,” and “Supplemental Analyses.” This arrangement allows for a progressive decision approach to waste identification enabling EQAL to analyze and to adequately identify the waste and to provide operational controls for the treatment processes as well as compatibility determinations.

All incoming waste shipments are subject to the Fingerprint Analyses. Fingerprint Analyses are sufficient to properly verify that the waste received is the same as the waste that was characterized and identified on the pre-acceptance evaluation (waste profile). This is not designed to characterize the waste. EQAL may perform other “Additional” or “Supplemental” analyses to provide further verification of waste characterization. These may be performed at the request of facility management to further identify a waste or to make certain proper handling or treatment can be achieved. EQAL management may select these additional and/or supplemental analyses when fingerprint analyses indicate non-conformance or to provide additional operational control and compatibility determinations. A summary of the analytical parameters with each category is provided below.

Fingerprint Analyses

The fingerprint analyses include six screening procedures that may be performed to provide a general identification of the waste received. These analyses provide the basis for the conformance check against the waste profile and manifest in confirming the identity of the waste. Based on a review of the Waste Profile and a visual examination of the waste, the following fingerprint analyses may be performed based on the observations. The parameters and the associated rationale of the six “Fingerprint Analyses” are as follows:

1. Physical Description (i.e. appearance, physical state, layers, etc.) is used to determine the general physical properties of the waste. This facilitates subjective comparison of the sampled waste with prior waste descriptions or samples. It is used to identify obvious differences in waste with prior waste descriptions or samples. It is used to identify obvious differences in waste type. It is also used to identify the presence or absence of free liquid.

2. The pH Screen is undertaken to indicate the pH and, in general, the corrosive nature of the waste. The pH Screen will also aid in the compatibility determinations. pH may not apply to certain waste types (e.g., organic solvent waste, oil waste, or insoluble solid waste).

3. Water Reactivity is used to determine whether the waste has a potential to vigorously react with water to form gases or other products and to indicate whether it generates extreme heat when mixed with water. This test does not apply to wastes that are already in contact with excess water, or for which sufficient analytical data exist that indicate no potential reactivity with water.

4. Flammability Potential Screen is used to indicate the ignitability potential of the waste. It is also used to identify obvious differences in waste type, such as waste solvent substituted for a waste acid. This test can be applied to all waste liquids, semi-solids, or solids.

5. Organic Halogen Screen is used to indicate whether or not halogenated organics are present in the waste and the need for further analysis. It is also used to identify obvious differences in waste type such as waste solvent substituted for a waste acid. This test can be applied to all waste liquids, semi-solids, or solids. The Organic Halogen Screen will be used for wastes where halogen information is necessary. For example, hazardous wastes carrying halogen waste codes would not require this screen since it would not provide any useful information.

6. Sulfide Screen is used to indicate whether the waste has the potential to produce hydrogen sulfide upon acidification. It is not required if the pH of the waste is less than 6.0 or if the waste is not suspected of containing sulfides.

Additional Analyses

The applicability of these analyses as described below, are based on procedures and protocol formulated by EQFL (when determined necessary for proper classification):

1. Solidification Evaluation Test is run to determine whether the waste is amenable to solidification and to determine the ratio of solidification reagent-to-waste required to effect solidification.

2. Land Disposal Restriction (LDR) Stabilization Evaluation Test is run to demonstrate whether or not a Land Disposal Restricted Waste can be stabilized to meet the appropriate treatment standard.

3. Oxidizer Screen is used to determine the presence of organic peroxides or inorganic oxidizers. It is not required if the waste is not suspected of being an oxidizer.

4. Cyanide Screen is used to indicate whether the waste has the potential to produce hydrogen cyanide upon acidification. It is not required if the pH of the waste is less than 6.0 or of the waste is not suspected of containing cyanides.

5. Sulfide Screen is used to indicate whether the waste has the potential to produce hydrogen sulfide upon acidification. It is not required if the pH of the waste is less than 6.0 or if the waste is not suspected of containing sulfides.

6. Peroxide Screen is used to indicate the presence of peroxides. It is not required if the waste is not suspected of containing peroxides.

7. BTU Screen is used on organic material to determine if BTU's are greater or less than 5,000 BTU/lb. for energy recovery by fuels substitution. It is not required for wastes not applicable to fuels substitution. It is also not required for fuels known to have greater than 5,000 BTU/lb.

8. Nitric Acid Screen is used to determine if material contains nitric acid. It is not required if the waste is not acidic or not suspected of containing nitric acid.

9. Radiation Screen is used to screen wastes for radioactivity above background. This screening is only performed if the waste is suspected of a potential for radioactivity.

10. GC Scan is used to identify separate organic compounds. A GC Scan may be requested by management if they believe it is needed.

11. Metals scan is used to identify metals constituents. A metals scan may be requested by management if they believe it is needed.

12. Consolidated Confirmatory Compatibility Testing. The SOP for this test procedure is contained in Appendix J (Volume 2 of 3) “Liquids Bulking.” Compatibility Testing is performed to determine if materials are compatible prior to consolidation or treatment.

Supplemental Analyses Using Standard Techniques

These test methods are adopted from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Office of Solid Waste SW-846, Updates and Appended Materials) and other EPA approved methods. Other methods may be added as required.

Analysis of Treated Characteristic Hazardous Wastes
EQAL, as part of its permitted treatment, will operate on the Bulking Pad a solidification process. The purpose is to treat characteristically hazardous waste codes such as D002 (corrosives); D004 (arsenic); D005 (barium); D006 (cadmium); D007 (chromium); D008 (lead); D009 (mercury); D010 (selenium); and D011 (silver).

Waste that is treated such that it no longer exhibits the hazardous waste characteristic(s) for which it was listed is no longer considered hazardous and can be disposed of at a non-RCRA regulated facility assuming a grab sample is also tested, meets LDRs and contains no free liquids. In the case of the material EQAL intends to treat, the objective would be to assure through analytical testing of representative, composite samples that the waste no longer meets the characteristics (can be decharacterized) and meets LDRs as summarized in Table 12-1 and further, that the treated material contains no free liquids as determined by the Paint Filter Test (Method 9095B).

Waste is to be deposited directly into the top of the box, the pH adjusted, and then a solidification agent is introduced. The process will consist of raising the pH for metals treatment into the 9 to 13 range which appears to be the optimal range based on similar treatment processes at other EQ facilities. The materials are mixed using a backhoe, portable mixer, or similar piece of equipment. Additional solidification agent is added until no free liquids are present. Frequent bench testing will be required and samples will be collected at suspected endpoints of treatment and analyzed for a short duration (30-90 min) TCLP test or possibly, because the material will be a solid, a total metals analysis for the D004-D011 waste codes. EQ has found at other facilities that if a sample does not pass a TCLP test after 90 minutes, it's not likely to pass a full, 24-hr TCLP. Treated materials that "pass" the short duration TCLP test will be followed by a representative, composite sampling of the waste which will be sent off site for TCLP analysis by a NELAP accredited laboratory. Further, a grab sample will be randomly collected to assure the treated waste meets LDRs and can be disposed of at a non-hazardous, Subtitle D landfill.

Treated materials that pass the TCLP test, meet the LDRs and contain no free liquids will be loaded into roll off boxes and/or dump trailers for subsequent disposal at an approved disposal facility (Subtitle D landfill). If the treated material fails the initial TCLP screening and is still characteristically hazardous, it will continue to be treated until a TCLP test has confirmed the material no longer retains the hazardous characteristics (can be de-characterized) for the waste being treated. Further, a grab sample of the treated material will also be tested to assure it meets LDRs. It should also be pointed out that the disposal facility accepting the treated material may require additional testing before they will accept the waste. EQAL will determine additional testing requirements for the anticipated disposal facility and have the samples analyzed accordingly.

Analytical Procedures

Fingerprint Analyses

These are analytical procedures designated to identify or screen waste. They have been developed by EQAL based upon its operating experience as rapid but effective means for establishing key decision parameters pertinent to proper waste management.

1. Physical Description. Samples are inspected and the physical appearance of the waste is recorded Physical State (solid, semi-solid, liquid, etc.)

2. pH Screen. Full-range pH paper or a pH meter is used directly on liquid samples and on the free liquid portion of liquid/solid samples.

3. Water Mix Test. Approximately equal volumes of waste and water are mixed. Water should be added to the waste rather than addition of wastes to water. The following characteristics are noted:
   - Gross Solubility in H_20
   - Gross Specific Gravity (heavier or lighter than water)
     If water reactivity is noted (generation of gases, heat, turbulence or sudden physical changes such as solidification, thickening or emulsification) record the results.

4. Flammability Potential Screen. A small amount of a liquid waste sample or a solid waste sample is placed into an aluminum-weighing tray (or similar laboratory container). A flame is very briefly applied to the sample. If the sample does not ignite, the result is recorded as a negative flammability potential (e.g., negative). If the sample ignites with the application of a flame, then the result is recorded as positive and may require further investigation. Liquids with a negative flammability potential may be quantified using an approved flash point tester.

Solids may be further investigated (e.g., via review of the Generator's Waste Material Profile Sheet or other supporting documentation) to determine flammability and BTU value for possible fuel blending disposal off site. The investigation will also examine the waste's potential to cause fire through friction, absorption of moisture, or spontaneous chemical changes.
Note: Halogenated solvents typically give off vapors that burn with a yellow (or greenish) smoky (sooty) flame in the presence of an external flame. Wastes with this type of non-sustaining flame are reported as having a negative flammability potential.

Additional Waste Analyses

1. Specific Gravity. This test is performed to aid in determining if an acid or base may be concentrated or to determine the weight of the material.

2. Cyanide Screen. This screening test is performed using Cyantessmo (or equivalent) test paper according to the laboratory operating procedure.

3. Sulfide Screen. This screening test is performed using lead acetate test paper (or equivalent) according to the laboratory operating procedure.

4. Radiation Screen. The sample is placed in a position below the Geiger-Mueller probe (or equivalent) for a period of at least five (5) seconds. An audible alarm and meter reading above the background reading will indicate radioactivity.

5. Oxidizer Screen. This screening test is performed using potassium-iodide starch test paper (or equivalent) according to the laboratory operating procedure. All positive oxidizer screen results will be verified with an ORP test (or equivalent).

6. Consolidated Confirmatory Compatibility Testing. SOP

APPENDIX I

Profile Tracking # _____

WASTE PROFILE FORM

For assistance in completing this document or for additional information on service offerings, please visit our website at www.usecology.com, or call 800-592-5489.

US Ecology will choose the appropriate facility and method of waste management for your waste from the technologies offered at each operation.

If you wish to direct this waste to a specific facility(s) or treatment technology please indicate here:

Waste Common Name:

Section 1 – Generator & Customer Information

Generator EPA ID # _____

NAICS/SIC Code _____

Generator _____

Facility Address _____

City _____ State _____ Zip _____

24-hour Emergency Response Number

_____

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact _____

Title _____

Phone _____ Fax _____

E-mail _____

Internal Use Only: EQ Division _____

EQ Customer No. _____

Invoicing Company _____

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact _____

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Cell Phone _____

E-mail _____

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: _____

b) Frequency: ❑ One time ❑ Month ❑ Year ❑ Other: _____

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ❑ Yes ❑ No

b) If "Yes", indicate the proper shipping name per 49CFR 172.101 Hazardous Materials Table:

_____

Section 3 – Special Properties

3.1) Color _____

3.2) Odor ❑ None ❑ Ammonia ❑ Amines ❑ Mercaptans ❑ Sulfur ❑ Organic Acid ❑ Amines/Ammonia ❑ Other: _____

3.3) Consistency at 70^0F: ❑ Solid ❑ Dust/Powder ❑ Debris ❑ Sludge ❑ Liquid ❑ Gas/Aerosol ❑ Varies

3.4) What is the pH? ❑ ≤2 ❑ 2.1-4.9 ❑ 5 – 10 ❑ 10.1 – 12.4 ❑ ≥12.5 ❑ N/A

3.5) What is the flash point? ❑ <90^0F ❑ 90-139^0F ❑ 140-199^0F ❑ >200^0F ❑ N/A

3.6) Does this waste exhibit any of the following properties? **(check all that apply)**

❑ **None**	❑ Free Liquids	❑ Metal Fines	❑ Water Reactive	❑ Biohazard
❑ Shock Sensitive	❑ Oily Residue	❑ Dioxins	❑ Furans	❑ Aluminum
❑ Asbestos – non-friable	❑ Asbestos – friable	❑ Other Radioactive	❑ Air Reactive	❑ Isocyanates
❑ Biodegradable Sorbents	❑ Pyrophoric	❑ Reactive Sulfide	❑ Reactive Cyanide	❑ Explosives
❑ Temperature Controlled Organic Peroxide		❑ NORM	❑ TENORM	

Section 4 – Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges of the material, either estimated or known.

_____ _____ to ____% _____ _____ to ____%

_____ _____ to ____% _____ _____ to ____%

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*

_____

_____

_____

4.3) Are there any known previous handling or treatment issues involving this waste? ❑ Yes* ❑ No

*If yes, describe: _____

Section 5 – Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules: **Please list applicable waste code(s):**

5.1) Is this waste exempted from RCRA? ❑ Yes, please provide exemption: _____ ❑ No

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ❑ Yes: _____ ❑ No

a) For F006–F009, F012, does this come from a generator that conducts a cyanide plating process? ❑ Yes ❑ No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ❑ Yes: _____ ❑ No

5.4) Do any State Specific Hazardous Waste Codes apply? ❑ Yes: _____ ❑ No

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: _____ EPA Form Code: _____

5.6) Waste Code Determination Is Based On: ❑ Generator Knowledge ❑ Analysis ❑ MSDS

Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.

5.7) Does this waste exceed Land Disposal Restriction levels? ❑ Yes ❑ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ❑ WW ❑ NWW

b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40CFR 268.49? ❑ Yes ❑ No

c) Does this waste contain greater than 50% debris, by volume? ❑ Yes ❑ No
(Debris is greater than 2.5 inches in size.)

d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight:

_____

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ❑ Yes* ❑ No

*If Yes, please list: _____

For a complete list of UHC constituents, please refer to 40 CFR 268.48

Section 6 – Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ❑ Yes ❑ No _____

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ❑ UNIV ❑ RG ❑ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ❑ Yes ❑ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ❑ Yes ❑ No

b) If yes, what is the source of the halogen content?

- ❑ This is a metalworking oil/fluid containing chlorinated paraffins.
- ❑ This is used oil contaminated with chlorofluorocarbons from refrigeration units.
- ❑ This oil contains halogenated solvents. List specific solvents: _____
- ❑ Other, describe: _____

Section 7 – TSCA Information

7.1) What is the concentration of PCBs in the waste? ❑ None ❑ 0-49 ppm ❑ 50-499 ppm ❑ 500+ ppm

7.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ❑ Yes ❑ No ❑ Unknown

If you answered "none" or "0-49 ppm"' to 7.1 and "no" to 7.2, please proceed to Section 8.

7.3) Has this waste been processed into a non-liquid form? ❑ Yes* ❑ No

*If yes, what was the concentration of PCBs prior to processing? ❑ 0-499 ppm ❑ 500+ ppm

7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ❑ Yes ❑ No

7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ❑ Yes ❑ No

7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ❑ N/A ❑ Yes ❑ No

Section 8 – Clean Air Act Information

8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ❑ Yes ❑ No

8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ❑ Yes ❑ No

8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ❑ Yes* ❑ No

*If Yes this document serves as notification that this waste contains chemicals _____ , _____ required to be managed in accordance with Part ❑ 61 ❑ 62 ❑ 63 Subpart _____ of NESHAP/MACT standards.

8.4) Does this waste stream contain Benzene? ❑ Yes ❑ No

If you answered "no" to 8.4, please proceed to Section 9.

8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)?

❑ Yes, please provide the SIC/NAICS code: _____ ❑ No

If you answered "no" to questions 8.5, please proceed to Section 9.

8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site?

❑ Yes, please specify: _____ ❑ No

8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ❑ Yes ❑ No

8.8) Does the waste contain >10% water? ❑ Yes ❑ No

8.9) What is the TAB quantity for your facility? _____ Mg/Year

8.10) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.

Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.

Section 9 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.

Generator Signature _____ Printed Name _____

Company _____ Title _____ Date _____

STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ – The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

Definitions

The following definitions shall apply for purposes of this Agreement:

"**Acceptable Waste"** shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"**Delivered Wastes"** shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii)) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statues, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

RE-APPROVAL NOTICE

Customer Account: _____

Name: _____

Company: _____

Address: _____

City, State Zip: _____

Thank you for selecting US Ecology as your environmental management partner. In the event that a waste stream has changed, the generator may use this form to re-approve the waste profile.

Generator Name: _____ **EPA ID No.:** _____

For Benzene NESHAP Regulated Generators: Please provide your updated TAB here _____ Mg/Year, if this field is left blank, it will be assumed that there are no changes to the TAB quantity for your facility.

Waste Common Name: _____

Waste Code(s): _____

Approval No.: Expiration Date:

Please select one of the following options:

- ❑ Re-approval with No Process Change
- ❑ Re-approval with Process Change
- ❑ Process Change

Please provide a detailed description below of the changes to the waste stream:

_____

_____

This Re-approval Notice acknowledges the acceptability of waste material(s) into the EQ facility(s) and ensures that each facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s). Upon signature and submittal of this form, the waste stream will be reviewed to extend the expiration for one year.

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the Standard Terms and Conditions associated with the original Waste Profile. (The Standard Terms and Conditions are incorporated into the Waste Profile as Page 4.)

Generator Signature: _____ Printed Name: _____

Company: _____ Date: _____

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM

Generator Name: _____ **U.S. EPA ID No.:** _____

Uniform Manifest No.: _____ **LDR Page** _____ **of** _____

Manifest Page No. & Line Item	U.S. EPA Hazardous Waste Code (s)	NWW or WW	LDR Certification (One per Line)	Subcategory	Reference Number(s) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Contaminated Soil (10x) and Debris.

I hereby certify that all information submitted on this and all associated documents, is complete and accurate to the best of my knowledge and information.

Generator Signature: _____ **Title:** _____

Printed Name: _____ **Date:** _____

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM

Instructions

Please complete one line per waste stream:

Column 1: Enter the corresponding manifest page number and line item.

Column 2: Identify all U.S. EPA hazardous waste codes that apply to this waste shipment.

Column 3: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW). Wastewaters contain less than 1% filterable solids and less than 1% Total Organic Carbon.

Column 4: Enter the letter of the appropriate paragraph from page 3 of this form. *(For generators of contaminated soil using the 10X rule, please select 'S' and circle the appropriate options. Please include the certification page with your shipment.)*

Column 5: Enter the appropriate Subcategory, if applicable. A reference list is available on page 4 of this document.

Column 6: For F001 – F005, F039, D001 – D043, Debris and Contaminated Soil (10X): please enter the Reference Number(s) for any constituents in your waste stream subject to treatment. The Reference Number(s) can be found in the attached Underlying Hazardous Constituent Table on pages 5-8.

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM

LDR Certifications

S. **GENERATORS OF CONTAMINATED SOIL**
THIS CONTAMINATED SOIL *DOES / DOES NOT* CONTAIN LISTED HAZARDOUS WASTE AND *DOES / DOES NOT* EXHIBIT
(CIRCLE ONE) (CIRCLE ONE)
A CHARACTERISTIC OF HAZARDOUS WASTE AND *IS SUBJECT TO / COMPLIES WITH* THE SOIL TREATMENT
(CIRCLE ONE)
STANDARDS AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS.

A. THIS RESTRICTED WASTE REQUIRES TREATMENT TO THE APPLICABLE STANDARD. This waste must be treated to the applicable performance based treatment standard set forth in 40CFR Part 268 Subpart C and Subpart D, 268.40 or RCRA Section 3004(d) prior to land disposal.

B. THIS HAZARDOUS DEBRIS IS SUBJECT TO THE ALTERNATIVE TREATMENT STANDARDS OF 40 CFR 268.45.

C. THIS RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT TREATMENT. I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR part 268 subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

D. THIS RESTRICTED WASTE HAS BEEN TREATED TO THE PERFORMANCE STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

E. THIS LAB PACK DOES NOT CONTAIN ANY WASTES IDENTIFIED AT APPENDIX IV TO PART 268. I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under appendix IV to 40 CFR part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

F. THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC AND CONTAINS UNDERLYING HAZARDOUS CONSTITUENTS THAT REQUIRE FURTHER TREATMENT TO MEET THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

G. THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC AND BEEN TREATED FOR UNDERLYING HAZARDOUS CONSTITUENTS. I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic and that underlying hazardous constituents, as defined in §268.2(i) have been treated on-site to meet the §268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

H. THIS RESTRICTED WASTE IS SUBJECT TO AN EXEMPTION FROM LAND DISPOSAL. *(Please include the date the waste is subject to the prohibitions in Column 5)* This waste is subject to an exemption from a prohibition on the type of land disposal method utilized for the waste (such as, but not limited to, a case-by-case extension under 40 CFR Part 268.5, an exemption under 40 CFR 268.6, or a nationwide capacity variance under 40 CFR 269 Subpart C)

I. THIS RESTRICTED WASTE WITH TREATMENT STANDARDS EXPRESSED AS CONCENTRATIONS IN THE WASTE PURSUANT TO 268.43, IF COMPLIANCE WITH THE TREATMENT STANDARDS IN SUBPART D OF THIS PART IS BASED IN PART OR IN WHOLE ON THE ANALYTICAL DETECTION LIMIT ALTERNATIVE IN 268.40(d). I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good-faith efforts to analyze for such constituents. I am aware there are significant penalties for submitting false certifications, including the possibility of fine and imprisonment.

J. TREATMENT FACILITIES GENERATING CONTAMINATED SOIL TREATED TO THE STANDARDS IN 268.49.
I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Subcategories

D001 – **Ignitable Characteristic Wastes**, except for the §261.21(a)(1) High TOC Subcategory.

D001 – **High TOC Ignitable Characteristic Liquids Subcategory** based on 40 CFR 261.21(a)(1) – Greater than or equal to 10% total organic carbon (Note: This subcategory consists of nonwastewaters only.)

D002 – **Acidic Subcategory** based on 40 CFR 261.22(a)(1) – It is aqueous and has a pH less than or equal to 2.

D002 – **Alkaline Subcategory** based on 40 CFR 261.22(a)(1) – It is aqueous and has a pH greater than or equal to 12.5.

D003 – **Reactive Sulfides Subcategory** based on 261.23(a)(5).

D003 – **Other Reactive Subcategory** based on 261.23(a)(1).

D003 – **Water Reactive Subcategory** based on 261.23(a)(2), (3), and (4). (Note: This subcategory consists of nonwastewaters only).

D003 – **Reactive Cyanides Subcategory** based on 261.23(a)(5)

D006 – **Cadmium Containing Batteries Subcategory**. (Note: This subcategory consists of nonwastewaters only).

D008 – **Lead Acid Batteries Subcategory**: (Note: This standard only applies to lead acid batteries that are identified as RCRA hazardous wastes and that are not excluded elsewhere from regulation under the land disposal restrictions of 40 CFR 268 or exempted (see 40 CFR 266.80). This subcategory consists of nonwastewaters only.)

D009 – Nonwastewaters that exhibit, or are expected to exhibit, the characteristic of toxicity for mercury based on the toxicity characteristic leaching procedure (TCLP) in SW846; and contain greater than or equal to 260 mg/kg total mercury that also contain organics and are not incinerator residues. **(High Mercury-Organic Subcategory)**

D009 – Nonwastewaters that exhibit, or are expected to exhibit, the characteristic of toxicity for mercury based on the toxicity characteristic leaching procedure (TCLP) in SW846; and contain greater than or equal to 260 mg/kg total mercury that are inorganic, including incinerator residues and residues from RMERC. **(High Mercury-Inorganic Subcategory)**

D009 – Nonwastewaters that exhibit, or are expected to exhibit, the characteristic of toxicity for mercury based on the toxicity characteristic leaching procedure (TCLP) in SW846; and contain less than 260 mg/kg total mercury and that are residues from RMERC only. **(Low Mercury Subcategory)**

D009 – All other nonwastewaters that exhibit, or are expected to exhibit, the characteristic of toxicity for mercury based on the toxicity characteristic leaching procedure (TCLP) in SW846; and contain less than 260 mg/kg total mercury and that are not residues from RMERC. **(Low Mercury Subcategory)**

F025 – Condensed light ends from the production of certain chlorinated aliphatic hydrocarbons, by free radical catalyzed processes. These chlorinated aliphatic hydrocarbons are those having carbon chain lengths ranging from one to and including five, with varying amounts and positions of chlorine substitution. **F025 – Light Ends Subcategory**

F025 – Spent filters and filter aids, and spent desiccant wastes from the production of certain chlorinated aliphatic hydrocarbons, by free radical catalyzed processes. These chlorinated aliphatic hydrocarbons are those having carbon chain lengths ranging from one to an including five, with varying amounts and positions of chlorine substitution. **F025 - Spent Filters/Aids and Desiccants Subcategory**

K069 – Emission control dust/sludge from secondary lead smelting – **Calcium Sulfate (Low Lead) Subcategory**

K069 – Emission control dust/sludge from secondary lead smelting – **Non-Calcium Sulfate (High Lead) Subcategory**

K071 – (Brine purification muds from the mercury cell process in chlorine production, where separately prepurified brine is not used) nonwastewaters that are residues from RMERC - **Residues from RMERC**

K071 – (Brine purification muds from the mercury cell process in chlorine production, where separately prepurified brine is not used.) nonwastewaters that are not residues from RMERC – **Not Residues from RMERC**
K106 – K106 (wastewater treatment sludge from the mercury cell process in chlorine production) nonwastewaters that contain greater than or equal to 260 mg/kg total mercury – **High Mercury Subcategory**

K106 – K106 (wastewater treatment sludge from the mercury cell process in chlorine production) nonwastewaters that contain less than 260 mg/kg total mercury that are residues from RMERC – **Low Mercury RMERC Subcategory**

K106 – Other K106 nonwastewaters that contain less than 260 mg/kg total mercury and are not residues from RMERC. **– Low Mercury Subcategory**

P047 – **4,6-Dinitro-o-cresol**

P047 – **4,6-Dinitro-o-cresol salts**

P065 – Mercury Fulminate nonwastewaters, regardless of their total mercury content, that are no incinerator residues or are not residues from RMERC – **Not Residues**

P065 – Mercury Fulminate nonwastewaters that are either incinerator residues or are residues from RMERC; and contain greater than or equal to 260 mg/kg total mercury – **High Mercury Residues**

P065 – Mercury Fulminate nonwastewaters that are residues from RMERC and contain less than 260 mg/kg total mercury – **Low Mercury RMERC Residue**

P065 – Mercury fulminate nonwastewaters that are incinerator residues and contain less than 260 mg/kg total mercury – **Low Mercury Incinerator Residue**

P092 – Phenyl mercuric acetate nonwastewaters, regardless of their total mercury content, that are not incinerator residues or are not residues from RMERC – **Not Residues**

P092 – Phenyl mercuric acetate nonwastewaters that are either incinerator residues or are residues from RMERC; and still contain greater than or equal to 260 mg/kg total mercury – **High Mercury Residues**

P092 – Phenyl mercuric acetate nonwastewaters that are residues from RMERC and contain less than 260 mg/kg total mercury – **Low Mercury RMERC Residues**

P092 – Phenyl mercuric acetate nonwastewaters that are incinerator residues and contain less than 260 mg/kg total mercury – **Low Mercury Incinerator Residue**

U151 – (mercury) nonwastewaters that contain greater than or equal to 260 mg/kg total mercury – **High Mercury Subcategory**

U151 – (mercury) nonwastewaters that contain less than 260 mg/kg total mercury and that are residues from RMERC only – **Low Mercury RMERC Residues**

U151 – (mercury) nonwastewaters that contain less than 260 mg/kg total mercury and that are not residues from RMERC – **Low Mercury Subcategory**

U151 – All U151 (mercury) wastewaters – **All Subcategory**

U151 – Elemental mercury contaminated with radioactive materials – **Elemental RAM**

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM

Universal Treatment Standards Table

ORGANIC CONSTITUENTS

Ref No.	Hazardous Constituent	WW mg/l	NWW mg/l	Ref No.	Hazardous Constituent	WW mg/l	NWW mg/l
1	Acenaphthene	0.059	3.4	42	2-Chloro-1,3-butadiene (Chloroprene)	0.057	0.28
2	Acenaphthylene	0.059	3.4	43	Chlorodibromomethane	0.057	15
3	Acetone	0.28	160	44	Chloroethane	0.27	6
4	Acetonitrile	5.6	38	45	Chloroform	0.046	6
5	Acetophenone	0.01	9.7	46	p-Chloro-m-cresol	0.018	14
6	2-Acetylaminofluorene	0.059	140	47	2-Chloroethyl vinyl ether	0.062	NA
7	Acrolein	0.29	NA	48	Chloromethane (Methyl chloride)	0.19	30
8	Acrylonitrile	0.24	84	49	2-Chloronaphthalene	0.055	5.6
9	Acrylamide	19	23	50	2-Chlorophenol	0.044	5.7
10	Aldrin	0.021	0.066	51	3-Chloropropylene (Allyl Chloride)	0.036	30
11	4-Aminobiphenyl	0.13	NA	52	Chrysene	0.059	3.4
12	Aniline	0.81	14	274	p-Credisine	0.01	0.66
273	o-Anisidine (2-methoxyaniline)	0.01	0.66	53	o-Cresol (2-Methyl phenol)	0.11	5.6
13	Anthracene	0.059	3.4	54	m-Cresol (3-Methyl phenol)	0.77	5.6
14	Aramite	0.36	NA	55	p-Cresol (4-Methyl phenol)	0.77	5.6
15	alpha-BHC	0.0001	0.066	56	Cyclohexanone	0.36	0.75*
16	beta-BHC	0.0001	0.066	57	o,p`-DDD	0.023	0.087
17	delta-BHC	0.023	0.066	58	p,p`-DDD	0.023	0.087
18	gamma-BHC (Lindane)	0.0017	0.066	59	o,p`-DDE	0.031	0.087
19	Benz(a)anthracene	0.059	3.4	60	p,p`-DDE	0.031	0.087
20	Benzal chloride	0.055	6	61	o,p`-DDT	0.0039	0.087
21	Benzene	0.14	10	62	p,p`-DDT	0.0039	0.087
22	Benzo(a)pyrene	0.061	3.4	63	Dibenz(a,h)anthracene	0.055	8.2
23	Benzo(b)fluoranthene	0.11	6.8	64	Dibenz(a,e)pyrene	0.061	NA
24	Benzo(k)fluoranthene	0.11	6.8	65	1,2-Dibromo-3-chloropropane	0.11	15
25	Benzo(g,h,i)perylene	0.0055	1.8	66	1,2-Dibromoethane (Ethylene dibromide)	0.028	15
26	bis(2-Chloroethoxy)methane	0.036	7.2	67	Dibromomethane	0.11	15
27	bis(2-Chloroethyl)ether	0.033	6	68	m-Dichlorobenzene (1,3-Dichlorobenzene)	0.036	6
28	bis(2-Chloroisopropyl) ether	0.055	7.2	69	o-Dichlorobenzene (1,2-Dichlorobenzene)	0.088	6
29	bis(2-Ethylhexyl) phthalate	0.28	28	70	p-Dichlorobenzene (1,4-Dichlorobenzene)	0.09	6
30	Bromodichloromethane	0.35	15	71	Dichlorodifluoromethane	0.23	7.2
31	Bromomethane (Methyl bromide)	0.11	15	72	1,1-Dichloroethane	0.059	6
32	4-Bromophenyl phenyl ether	0.055	15	73	1,2-Dichloroethane	0.21	6
33	n-Butyl alcohol	5.6	2.6	74	1,1-Dichloroethylene	0.025	6
34	Butyl benzyl phthalate	0.017	28	75	trans-1,2-Dichloroethylene	0.054	30
35	2-sec-Butyl-4,6-dinitrophenol (Dinoseb)	0.066	2.5	76	2,4-Dichlorophenol	0.044	14
36	Carbon disulfide	3.8	4.8	77	2,6-Dichlorophenol	0.044	14
37	Carbon tetrachloride	0.057	6	78	2,4-Dichlorophenoxyacetic acid (2.4-D)	0.72	10
38	Chlordane (alpha and gamma isomers)	0.0033	0.26	79	1,2-Dichloropropane	0.85	18
39	p-Chloroaniline	0.46	16	80	cis-1,3-Dichloropropylene	0.036	18
40	Chlorobenzene	0.057	6	81	trans-1,3-Dichloropropylene	0.036	18
41	Chlorobenzilate	0.1	NA	82	Dieldrin	0.017	0.13

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM

Ref No.	Hazardous Constituent	WW mg/l	NWW mg/l	Ref No.	Hazardous Constituent	WW mg/l	NWW mg/l
83	Diethyl phthalate	0.2	28	124	Iodomethane	0.19	65
84	p-Dimethylaminoazobenzene	0.13	NA	125	Isobutyl alcohol (Isobutanol)	5.6	170
267	2,4-Dimethlaniline (2,4-xylidine)	0.01	0.66	126	Isodrin	0.021	0.066
85	2,4-Dimethyl phenol	0.036	14	127	Isosafrole	0.081	2.6
86	Dimethyl phthalate	0.047	28	128	Kepone	0.0011	0.13
87	Di-n-butyl phthalate	0.057	28	129	Methacrylonitrile	0.24	84
88	1,4-Dinitrobenzene	0.32	2.3	130	Methanol	5.6	0.75
89	4,6-Dinitro-o-cresol	0.28	160	131	Methapyrilene	0.081	1.5
90	2,4-Dinitrophenol	0.12	160	132	Methoxychlor	0.25	0.18
91	2,4-Dinitrotoluene	0.32	140	133	3-Methylchloroanthrene	0.0055	15
92	2,6-Dinitrotoluene	0.55	28	134	4,4-Methylene bis (2-chloroaniline)	0.5	30
93	Di-n-octyl phthalate	0.017	28	135	Methylene chloride	0.089	30
94	Di-n-propylnitrosamine	0.4	14	136	Methyl ethyl ketone	0.28	36
95	1,4-Dioxane	12	170	137	Methyl isobutyl ketone	0.14	33
96	Diphenylamine	0.92	13	138	Methyl methacrylate	0.14	160
97	Diphenylnitrosamine	0.92	13	139	Methyl methansulfonate	0.018	NA
98	1,2-Diphenylhydrazine	0.087	NA	140	Methyl parathion	0.014	4.6
99	Disulfoton	0.017	6.2	141	Naphthalene	0.059	5.6
100	Endosulfan I	0.023	0.066	142	2-Naphthylamine	0.52	NA
101	Endosulfan II	0.029	0.13	143	o-Nitroaniline	0.27	14
102	Endosulfan sulfate	0.029	0.13	144	p-Nitroaniline	0.028	28
103	Endrin	0.0028	0.13	145	Nitrobenzene	0.068	14
104	Endrin aldehyde	0.025	0.13	146	5-Nitro-o-toluidine	0.32	28
106	Ethyl acetate	0.34	33	147	o-Nitrophenol	0.028	13
107	Ethyl benzene	0.057	10	148	p-Nitrophenol	0.12	29
108	Ethyl ether	0.12	160	150	N-Nitrosodiethylamine	0.4	28
109	Ethyl methacrylate	0.14	160	151	N-Nitrosodimethylamine	0.4	2.3
110	Ethylene oxide	0.12	NA	152	N-Nitroso-di-n-butylamine	0.4	17
111	Famphur	0.017	15	153	N-Nitrosomethylethylamine	0.4	2.3
112	Fluoranthene	0.068	3.4	154	N-Nitrosomorpholine	0.4	2.3
113	Fluorene	0.059	3.4	155	N-Nitrosopiperidine	0.013	35
114	Heptachlor	0.0012	0.066	156	N-Nitrosopyrrolidine	0.013	35
115	Heptachlor epoxide	0.016	0.066	264	1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD)	0.000063	0.005
116	Hexachlorobenzene	0.055	10	265	1,2,3,4,6,7,8,9-Octachlorodibenzofluran	0.000063	0.005
117	Hexachlorobutadiene	0.055	5.6	157	Parathion	0.014	4.6
118	Hexachlorocyclopentadiene	0.057	2.4	158	Total PCBs (sum of all PCB isomers, or all Aroclors)	0.1	10
119	HxCDDs (All Hexachlorodibenzo-p-dioxins)	0.000063	0.001	159	Pentachlorobenzene	0.055	10
120	HxCDFs (All Hexachlorodibenzofurans)	0.000063	0.001	160	PeCDDs (All Pentachlorodibenzo-p-dioxins)	0.000063	0.001
261	1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	0.000035	0.0025	161	PeCDFs (All Pentachlorodibenzofurans)	0.000035	0.001
262	1,2,3,4,6,7,8-Heptachlorodibenzofluran	0.000035	0.0025	162	Pentachloroethane	0.055	6
263	1,2,3,4,7,8,9-Heptachlorodibenzofluran	0.000035	0.0025	163	Pentachloronitrobenzene	0.055	4.8
121	Hexachloroethane	0.055	30	164	Pentachlorophenol	0.089	7.4
122	Hexachloropropylene	0.035	30	165	Phenacetin	0.081	16
123	Indeno (1,2,3-c,d) pyrene	0.0055	3.4	166	Phenanthrene	0.059	5.6

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM

Ref No.	Hazardous Constituent	WW mg/l	NWW mg/l	Ref No.	Hazardous Constituent	WW mg/l	NWW mg/l
167	Phenol	0.039	6.2	184	Toluene	0.08	10
266	1,3-Phenylenediamine	0.01	0.66	185	Toxaphene	0.0095	2.6
168	Phorate	0.021	4.6	186	Tribromomethane (Bromoform)	0.63	15
169	Phthalic acid	0.055	28	187	1,2,4-Trichlorobenzene	0.055	19
170	Phthalic anhydride	0.055	28	188	1,1,1-Trichloroethane	0.054	6
171	Pronamide	0.093	1.5	189	1,1,2-Trichloroethane	0.054	6
172	Propanenitrile (Ethyl cyanide)	0.24	360	190	Trichloroethylene	0.054	6
173	Pyrene	0.067	8.2	191	Trichloromonofluoromethane	0.02	30
174	Pyridine	0.014	16	192	2,4,5-Trichlorophenol	0.18	7.4
175	Safrole	0.081	22	193	2,4,6-Trichlorophenol	0.035	7.4
176	Silvex (2,4,5-TP)	0.72	7.9	194	2,4,5-Trichlorophenoxyacetic acid/2,4,5-T	0.72	7.9
177	1,2,4,5-Tetrachlorobenzene	0.055	14	195	1,2,3-Trichloropropane	0.85	30
178	TCDDs (All Tetachlorodibenzo-p-dioxins)	0.000063	0.001	196	1,1,2-Trichloro- 1,2,2-trifluoroethane	0.057	30
179	TCDFs (All Tetrachlorodibenzofurans)	0.000063	0.001	197	tris-(2,3-Dibromopropyl) phosphate	0.011	0.1
180	1,1,1,2-Tetrachloroethane	0.057	6	198	Vinyl chloride	0.27	6
181	1,1,2,2-Tetrachloroethane	0.057	6	199	Xylenes -mixed	0.32	30
182	Tetrachloroethylene	0.056	6	219	2-Ethoxyethanol	N/A	N/A
183	2,3,4,6-Tetrachlorphenol	0.03	7.4	220	2-Nitropropane	N/A	N/A

INORGANIC CONSTITUENTS

Ref No.	Hazardous Constituent	WW mg/l	NWW mg/l
200	Antimony	1.9	1.15
201	Arsenic	1.4	5
202	Barium	1.2	21
203	Beryllium	0.82	1.22
204	Cadmium	0.69	0.11
205	Chromium (Total)	2.77	0.6
206	Cyanides (Total)	1.2	590
207	Cyanides (Amenable)	0.86	30
208	Fluoride	35	NA
209	Lead	0.69	0.75
210	Mercury (retort residues)	NA	0.2
211	Mercury (all others)	0.15	0.025
212	Nickel	3.98	11
213	Selenium	0.82	5.7
214	Silver	0.43	0.14
215	Sulfide	14	NA
216	Thallium	1.4	0.2
217	Vanadium	4.3	1.6
218	Zinc	2.61	4.3

SECTION D

PROCESS INFORMATION

D-1 Containers

There are currently three solid waste management units dealing with container management at the facility including the container storage building, roll-off pad, and solids bulking pad. Additionally, there is one SWMU that is no longer active, where liquids were once bulked located in an area of the container storage building just inside the 12 foot roll-up door to the north of the building and extending outward into the gravel area north of the building. Each of the SWMU's are identified on Figures 1, 2, and 6 located in the Figures section of this application. Within the three active solid waste management units, there are currently several types of container management as shown below.

- containers (drums and totes) with free liquids
- containers (drums and totes) of solids without free liquids
- large containers (roll-offs and dump trailers) of solids without free liquids
- containers (drums) or original articles containing PCBs
- bulking of drums into roll-off containers
- bulking of drums and/or totes containing liquids into vacuum truck containers
- solids and liquid blending into roll-off containers
- solids stabilization into roll-off containers

D-1a Containers with Free Liquids, Solids, and PCBs

Containers (drums and totes) wilh free liquids, solids, or PCBs are stored in the container storage building (CSB). Consolidation (bulking) of liquid waste materials from drums and/or totes into a vacuum truck is proposed to be done inside the container storage building in the location shown on Figure 3 in the Figures section of this application. Containers (drums and totes) of solids will also be stored in box vans on the roll-off pad, with the exception of waste codes F020, F021, F022 , F023, F026, and F027 which will only be stored in the container storage building. Consolidation of solid waste materials with like waste codes from drums and/or totes into roll-off containers is performed on the solids bulking pad. Roll-off containers containing solid materials are stored on the roll-off pad (ROP), with the exception of waste codes F020, F021, F022, F023, F026, and F027 which will not be bulked and will only be stored in the container storage building.

D-1a(1) Basic Design Parameters, Dimensions, and Materials of Construction of Solid Waste Management Units and Their Containment Systems

D-1a(1)(a) Container Storage Building (CSB)

The CSB is a steel frame, slab-on-grade, metal building. The building contains ventilation fans and a dry chemical fire suppression system. The building contains two

12' overhead doors that allow for vehicle access. The container storage area inside the CSB is completely surrounded by a 6" x 6" concrete curb with 3" roll curbs at all door openings. The dimensions of the container storage building are illustrated in Figure 3 which is located in the Figures section of this application. The base of the CSB is a poured concrete floor with wire mesh reinforcing. The floor is free of cracks and gaps. Any cracks that do appear in the floor of the CSB are sealed with Sonolastic SL 1 one part self-leveling urethane sealant (or equivalent). The floor is covered with a protective coating that is compatible with the wastes being stored, thus, making the floor impervious to the wastes. The existing floor coating consists of the following materials:

1st Layer
BLP Mobile Paints,
Speedeck Floor & Deck Enamel, Quick Drying,
Battleship Gray 50-83 (Polyurethane);
2nd Layer
Sherman Williams,
Industrial Maintenance Coatings, Tile-Clad II Hardener Part B
B60 V 70, 630-2905

The operation of material handling equipment within the CSB for over 20 years (since May 7, 1991) without degradation of the floor is an effective demonstration of the structural integrity of the base. Repair or replacement will use equivalent materials. The drums are stored on wooden pallets approximately 5 inches high. The effect of pallet storage is twofold. The pallet keeps containers from contact with any standing liquid on the base and the pallet distributes the static load over a wide area of the floor.

D-1a(1)(a)(i) Liquid Bulking Area

Consolidation (bulking) of liquid waste materials from drums and/or totes into a vacuum truck is completed inside the container storage building in the location shown on Figure 3 located in the Figures section of this application. The liquid bulking area is located in the CSB and therefore inside the existing containment area as described above. The liquid bulking area is equipped with a grounding terminal to protect against static sparks while bulking ignitable liquids.

D-1a(1)(b) Roll-off Pad (ROP)

The ROP is constructed of poured concrete, reinforced with wire mesh. It is sloped from the front to the rear in the upper section and from the rear to the front to a 2' swale which runs the entire length of the pad in the lower section. The pad is surrounded with a 6" x 6" curb on three sides and contains a 6"x6" curb that separates the pad into 2 sections that is located 100' from the east side of the pad. Any cracks that appear in the roll-off pad are sealed with Sonolastic SL 1 one part self-leveling urethane sealant (or equivalent). The roll-off pad has been in operation since February 1,1995. The dimensions and capacity of the pad are listed below. For a more detailed illustration of

the design of the roll-off pad see Figure 4 located in the Figures section of this application.
Roll-off Pad - approximate dimensions - 315' x 80'; approximate capacity 100 roll-offs.

D-1a(1)(c) Bulking Pad

The bulking pad consists of an upper loading dock area and a lower area for positioning roll-offs for bulking. The dimensions of the entire area are included on Figure 5 located in the Figures section of this application. The bulking pad is constructed of poured concrete, reinforced with wire mesh. Any cracks that appear in the bulking pad are sealed with Sonolastic SL 1 one part self-leveling urethane sealant (or equivalent). The bulking pad slope is set at a 6 3/4 inch rise and 19 3/4 inch run with the lowest part of the slope positioned toward the North. Due to the slope, any spills which could occur in the area of the Bulking pad can be contained in the northern area of the pad surrounded by a 6" x 15" curb on the west side and the concrete block wall of the loading dock on the north and east sides, and pumped and/or absorbed and placed into drums for proper disposal. The bulking pad and the surrounding concrete curbs and walls were sealed with SealKrete Epoxy-Seal Deep Base No. 940 - Charcoal Gray and the loading dock was sealed with BLP Mobile Paints, Speedeck Floor & Deck Enamel, Quick Drying, Slate 50-85L (Polyurethane) and Sherman Williams, Tile Clad II Hardener Part B. The loading dock and bulking pad are covered by a roof and is further protected from rainfall by a rain curtain as described in the following section. Repairs or replacement will use equivalent materials. The current bulking pad has been in place since February 4, 2005. The prior pad was demolished and removed as the slope of the previous pad could not be determined to comply with ADEM Admin. Code R 335-14-5-.03(2) per a site visit by ADEM personnel. The prior bulking pad had been utilized at the facility since February 1, 1995.

D-1a(1)(c)1. Rain curtain

A rain curtain has been installed along the southern side (open end) of the solids bulking pad. The rain curtain extends from the roof overhang to the top of the concrete at the bulking pad. The rain curtain is made of 1/8-inch thick strips of clear plastic materials that are each 14 inches wide. Each strip overlaps 7 inches on each of the adjacent strips so that the gaps between the strips are covered. The curtain will prevent rain from blowing on to the bulking pad, but will allow a truck to remove a roll-off from or place a roll-off onto the bulking pad. The rain curtain has also been installed along the southern side of the loading dock, which is adjacent to the eastern side of the bulking pad. The rain curtain on the loading dock extends from the roof overhang to the surface of the loading dock.

D-1a(1)(d) Solids & Liquid Blending in Roll-Off Box at Bulking Pad

The basic design parameters, dimensions, and materials of construction for the bulking pad and its containment system remain as described previously. No changes are proposed for the bulking pad.

D-1a(1)(e) Solids Stabilization in Roll-Off Box at Bulking Pad

The basic design parameters, dimensions, and materials of construction for the bulking pad and its containment system remain as described previously. No changes are proposed for the bulking pad.

D-1a(2) Description of How Design Promotes Drainage or How Containers are Kept From Contact with Standing Liquids in the Containment System

D-1a(2)(a) Container Storage Building and Liquid Bulking Area

The container storage area inside the CSB is completely surrounded by a 6" x 6" concrete curb with 3 inch roll curbs at all door openings. The containers (drums & totes) are stored on wooden pallets approximately five (5) inches high. Pallets may be stacked two (2) high in the CSB. The wooden pallets keep the containers from contact with any standing liquid in the CSB. The tank on the proposed vacuum truck will be located on an elevated trailer keeping the container from contacting any standing liquid in the CSB. Any accumulated liquid is pumped and/or absorbed and placed into a drum for proper disposal.

D-1a(2)(b) Roll-Off Pad (ROP)

The ROP is sloped from the front to the rear and is surrounded with a 6" x 6" curb on three sides. Any standing liquids drain to the rear where they are discharged through storm drains that lead to the facility's NPDES permitted storm-water discharge point. No roll-offs are stored on the forward 10' of the ROP that slopes toward the swale in order to prevent contamination from a potential spill from traveling to the NPDES outfall. If contaminants are known to exist on the roll-off pad, the storm drains would be closed off until the ROP had been decontaminated and liquid would not be allowed to discharge. The standing liquids would be pumped and/or absorbed and placed into drums for proper disposal.

D-1a(2)(c) Bulking Pad

The bulking pad is constructed on a slope of 6-3/4 inch rise and 19-3/4 inch run with the lowest area situated to the North. The bulking pad is surrounded by a 6" x 15" curb on the west side and the concrete block walls of the loading dock on the north and east sides. The pad is sealed with SealKrete Epoxy-Seal Deep Base No. 940 - Charcoal Gray. The pad is covered by a roof and protected from rain-fall by a rain curtain; therefore, liquids associated with rain-fall should not accumulate on the bulking pad. In the event of a spill, any spill materials would be contained in the northern area of the pad surrounded by the curb and the walls of the loading dock where they could be pumped and/or absorbed and placed into drums for proper disposal. Additionally the roll-offs sit on 8" steel wheels and an 8" stand that would prevent contact with any

accumulated liquids. Please note that the bulking pad now meets the containment requirements of ADEM Admin. Code R. 335-14-5-.09(6).

D-1a(2)(d) Solids & Liquid Blending in Roll-Off Box at Bulking Pad

The description of how the design promotes drainage or how containers are kept from contact with standing liquids in the containment system was described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1a(2)(e) Solids Stabilization in Roll-Off Box at Bulking Pad

The description of how the design promotes drainage or how containers are kept from contact with standing liquids in the containment system was described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1a(3) Capacity of the Containment System Relative to the Number and Volume of Containers to Be Stored

D-1a(3)(a) Container Storage Building (CSB) with Liguid Bulking Area

The volume of the largest container (the proposed vacuum truck) is a 6,000 gallon tanker truck trailer. The potential total volume of all of the containers is 104,250 gallons (See Figure 3 for the capacity of each Area). Ten (10%) percent of the volume of the containers is 10,425 gallons. However, the CSB is divided into separate areas that have separate containment.

Area 1 has a separate containment system from Areas 2 through 5. The total storage capacity of Area 1 is 12,850 gallons with the largest potential container being 350-gallons. Area 1 is large enough to store 192 55-gallon drums (10,560 gallons) and has containment capacity to store up to 36 350-gallon totes (12,600 gallons). A total of no more than 12,850 gallons of waste will be stored in Area 1 at any one time. Area 1 provides 1,285 gallons of containment, which is greater than the largest container that would be stored there and is equal to 10% of the maximum volume of storage. Areas 2 through 5 provide a total storage capacity of 976 55-gallon drums (53,680 gallons) or 244 350-gallon totes (85,400 gallons) and one 6,000 gallon vacuum truck. The maximum total volume of storage in Areas 2-5 is 91,400 gallons (including the 244 totes and the vacuum truck). The largest single container in this area would be the vacuum trailer at 6,000 gallons. Areas 2 through 5 provide 9,400 gallons of containment, which is greater than the largest single container and is greater than 10% of the maximum volume of storage. Therefore, the existing containment structure meets or exceeds the volume of the proposed largest containers and 10% of the proposed total volume.

Any standing liquid is pumped and/or absorbed and put into drums for proper disposal. Since this is a building, the storm intensity/frequency data do not apply. There is no run-off from this building. In addition, the containment meets the requirements of 40 CFR 761.65b for the storage of PCBs.

D-1 a(3)(b) Roll-Off Pad (ROP)

There is one ROP at this facility. (See Figure 4 located in the Figures section of this application.) Since containers holding only wastes with no free liquids are stored on the ROP, there is no need to have a containment system as defined by Administrative Code 335-14-5-.09(6)(b).

D-1a(3)(c) Bulking Pad

The bulking pad is constructed of poured concrete, reinforced with wire mesh. The bulking pad and the surrounding concrete curbs and walls were sealed with SealKrete Epoxy-Seal Deep Base No. 940 - Charcoal Gray. Any cracks that appear in the bulking pad are sealed with Sonolastic SL 1 one part self-leveling urethane sealant (or equivalent). The bulking pad slope is set at a 6 3/4 inch rise and 19 3/4 inch run with the lowest part of the slope positioned toward the North. Due to the slope, any spills which could occur in the area of the Bulking pad can be contained in the northern area of the pad surrounded by a 6" x 15" curb on the west side and the concrete block wall of the loading dock on the north and east sides, and within 24 hours of detection, pumped and/or absorbed and placed into drums for proper disposal. The bulking pad area provides 944 gallons of containment which is greater that the largest container, containing free liquids, (A 350 gallon tote from the loading dock) that could potentially cause a spill. The roll-off containers placed in this area will contain no free liquids, and therefore need not be considered in this determination. The loading dock and bulking pad are covered by a roof and is further protected from rainfall by a rain curtain as described in section D-1a(1)(c)1. There is no run-off from the bulking pad.

D-1a(3)(d) Solids & Liquid Blending in Roll-Off Box at Bulking Pad

The capacity of the containment system was described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1a(3)(e) Solids Stabilization in Roll-Off Box at Bulking Pad

The capacity of the containment system was described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1a(4) Provisions for Preventing or Managing Run-On

D-1a(4)(a) Container Storage Building (CSB) with Liquid Bulking Area

The CSB is a fully enclosed building and, as such, is not subject to run-on.

D-1a(4)(b) Roll-Off Pad (ROP)

The area around the ROP is graded to slope away to prevent run-on. The ROP is also designed such that three sides of the pad are protected from run-on by a 6" x 6" concrete curb, while the last side of the pad is protected from run-on by a 2' swale that will divert run-on before entering the ROP.

D-1a(4)(c) Bulking Pad (BP)

The bulking pad is covered with a roof. Additionally, a rain curtain described in section D-1a(1)(c)1 above should prevent rainfall from blowing onto the pad.

D-1a(4)(d) Solids & Liquid Blending in Roll-Off Box at Bulking Pad

The provisions for preventing or managing run-on were described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1a(4)(e) Solids Stabilization in Roll-Off Box at Bulking Pad

The provisions for preventing or managing run-on were described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1a(5) How Accumulated Liquids can be Analyzed and Removed to Prevent Overflow

D-1a(5)(a) Container Storage Building (CSB) with Liquid Bulking Area

Spilled or leaked waste is isolated and the container from which the waste was spilled or leaked is ascertained. If the waste can be readily identified from the labels on the container, it requires no further analysis. If the waste cannot be readily identified, it is sampled and its characteristics are analyzed. In either event, the waste liquid is pumped and/or absorbed and placed into a clean container(s), which is then isolated until the waste can be properly identified. The container from which the waste leaked or spilled is emptied or overpacked. In the event that the proposed vacuum truck develops a leak, the tank will either be repaired or the contents of the vacuum truck will be placed into individual drums or an additional tanker truck. Unless the spilled or leaked liquid has been positively identified, personal protective equipment for the most hazardous substance then residing in the CSB, shall be used for the cleanup.

D-1a(5)(b) Roll-Off Pad (ROP)

Since waste materials with free liquids are not stored on the ROP, there should be no spills of liquid waste materials. Additionally, since the ROP is sloped to storm drains there should be no accumulated liquids on the ROP. If contaminants are known to exist on the roll-off pad, the storm drains would be closed off until the ROP had been decontaminated and liquid would not be allowed to discharge. The standing liquids

would be pumped and/or absorbed and placed into drums for proper disposal. Roll-offs will not be stored on the forward 10' of the ROP that slopes toward the swale in order to prevent contamination from a potential spill from mixing with rainwater and traveling to the NPDES outfall.

D-1a(5)(c) Bulking pad (BP)

Any material spilled during the bulking operation will be swept up and placed into the roll-off container. Liquids are not bulked on the BP, but due to the slope, any spills which could occur in the area of the Bulking pad can be contained in the northern area of the pad surrounded by a 6" x 15" curb on the west side and the concrete block wall of the loading dock on the north and east sides, and pumped and/or absorbed and placed into drums for proper disposal. Additionally, since the BP is covered and protected from rainfall by a rain curtain, there should be no rainfall accumulation in the BP.

D-1a(5)(d) Solids & Liquid Blending in Roll-Off Box at Bulking Pad

The provisions for analyzing and removing accumulated liquids were described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1a(5)(e) Solids Stabilization in Roll-Off Box at Bulking Pad

The provisions for analyzing and removing accumulated liquids were described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1b Containers Without Free Liquids

Containers (drums & totes) without free liquids are stored in the "container storage building" (CSB) and in box vans on the roll-off pad. Containers (roll-offs) are stored on the roll-off pad (ROP). Consolidation (bulking) of like waste code materials from drums and/or totes into a roll-off container, is done on the "bulking pad" (BP).

D-1b(1) Test for Free Liquids

Containers without free liquids are required to have the waste profiled to the EQ Alabama facility. The profile documents the absence of free liquids.

D-1b(2) Description of Storage Area Design and Operation to Drain and Remove Liquids or How Containers are Kept from Contact with Standing Liquids

D-1b(2)(a) Container Storage Building (CSB) with Liquid Bulking Area

Drums and/or totes are stored on wooden pallets approximately 5" high. The vacuum truck container is located on a trailer and is therefore elevated.

D-1b(2)(b) Roll-Off Pad

The roll-off containers are elevated above the ROP on 8" steel wheels at the rear of the roll-off and with an 8" stand at the front of the roll-off.

D-1b(2)(c) Bulking Pad (BP)

The roll-off container on the BP is elevated above the pad on with 8" steel wheels at the rear of the roll-off and an 8" stand at the front of the roll-off.

D-1b(2)(d) Solids & Liquid Blending in Roll-Off Box at Bulking Pad

The provisions for keeping containers from contact with standing liquids were described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1b(2)(e) Solids Stabilization in Roll-Off Box at Bulking Pad

The provisions for keeping containers from contact with standing liquids were described above for the Bulking Pad. No changes are proposed for the Bulking Pad.

D-1c Container Management

Container management depends on the type of container being managed and the area in which it is stored. Each type of containers is discussed within the context of the discussion of the different storage areas. The storage areas to be discussed include:

- Container Storage Building (CSB)
- Bulking Pad (BP)
- Roll-Off Pad (ROP)

D-1c(1) Container Storage Building (CSB) with Liquid Bulking Area

The containers that are currently or proposed to be stored or handled in the CSB are classified as:

- DM - Metal Drums, barrels or kegs
- DF - Fiberboard or plastic drums, barrels or kegs
- CW - Wooden boxes, cartons, or cases
- CF - Fiber or plastic boxes, cartons or cases
- BA - Burlap, cloth, paper or plastic bags
- TT - Cargo Tanks (tank trucks)

The containers with the exception of the vacuum truck are delivered to the loading dock area prior to being unloaded into the CSB, or if there is an outbound shipment the containers are loaded onto a truck positioned on the loading/unloading ramp. These containers will be removed from the ramp/dock as soon as possible but in no case will be staged for more than 72 hours in this area.

The containers (excluding the vacuum truck) are handled either manually, with a drum dolly, with a clamp on a forklift truck, with the forks of a forklift truck, or on a pallet with a forklift truck. Extreme care is taken to avoid rupturing or damaging a container. Given the size of Area 4 (See Figure 3 in the Figures Section of this application) only one load is staged at any given time. By only having one load (i.e. unloaded off one truck) in the pre-acceptance area there should be no incompatible wastes stored in the same area. Any container(s) which does not appear to meet the criteria of the profile by which it was shipped is placed on a safety pallet, which is designed to contain spills (with a minimum of 2' of aisle space surrounding the pallet), and placed in the area designated as temporary storage on Figure 3 in the Figures section of this application or is placed in Area 1 within the diked area if no other materials are already in storage there. Analysis and/or generator knowledge will dictate whether the container(s) may be accepted or that the container be returned to the original generator if the material is not properly represented by the profile and the matter cannot be resolved. The vacuum truck will be maneuvered under its own power. During liquid bulking operations, the vacuum truck will be located in its designated area within the CSB as shown on the diagram of the CSB located in the Figures section of this application. Due to the length of the vacuum truck trailer, some small containers (drums or totes) stored within the CSB may have to be relocated temporarily during the bulking cooperation as shown in the diagram of the CSB in the Figures section of the application. The required two foot aisle space will be maintained around the drums and/or totes at all times during their temporary relocation. The proposed area provides for a minimum two foot aisle space around the vacuum truck. EQ Alabama will not own or store a vacuum truck onsite. The vacuum truck will be delivered to the site on an as needed basis. The vacuum truck driver will operate the vacuum truck; however, EQ Alabama personnel will be present during liquid bulking operations. Once wastes are consolidated into the truck, the truck will transport the waste material to its destination facility. The liquid bulking area is located in the CSB and therefore inside the existing containment area. The liquid bulking area will be equipped with a grounding terminal to protect against static sparks while bulking ignitable liquids.

A weekly container inspection is conducted in accordance with Section F-2b(1) of this application. A minimum two foot aisle space is required on one side of each row of containers for the detection of leaks and to contain spills in accordance with Section F-3b of this application. The containers (excluding the vacuum truck) are stored on wooden pallets and the containers on pallets may be stacked two high.

Reactive or incompatible wastes are placed within a separate diked area ("Area 1" as shown on Figure 3 located in the Figures section of this application) within the CSB. All containers that hold ignitable or reactive wastes are stored at least 50 feet from the

property line as shown in Figure 6 located in the Figures section of this application. Additionally, EQAL is planning to install a reactive magazine to improve the safety in storage of certain reactive wastes such as road flares, consumer boat flares, and similar materials received from retail generators. The magazine is a self contained steel box shaped device with limited storage capacity that is proposed to be located in the Area 1 location of the CSB. Specific reactive wastes will be placed within this magazine rather than being placed in general storage rows to reduce potential for fire or explosion. The original generator's label and an EQ Alabama label are required to be on each container while it remains in CSB.

Containers with PCBs, ignitable or reactive wastes, or waste streams F020, F021, F022, F023, F026, and F027 may be stored ONLY in the CSB. During the liquid bulking operation, incompatible wastes will not be placed into the same container. Additionally, the waste will not be placed in the vacuum truck if it previously contained an incompatible waste until the vacuum truck has been washed.

Under no circumstances will two incompatible wastes be stored in the same area in the container storage building. Should the reactive/corrosive area already contain waste, the incompatible wastes will be stored outside that area in the CSB. However, the incompatible wastes must be separated by the dike. Therefore, if both areas are occupied, or if the incompatible wastes cannot be separated by the dike for some other reason, the incompatible waste will not be accepted for storage within the facility until such time as one of the two areas becomes unoccupied.

D-1c(2) Roll-Off Pad (ROP)

Roll-Off containers as well as box vans may be placed on the ROP. "Standard" roll-offs contain bulk wastes without free liquids. "Standard" roll-offs are placed onto and moved about the ROP using a yard truck or box van and a roll-off container tilt trailer. A minimum of 2' of aisle space is required on one side of each row of containers for detection of leaks and to contain spills. The original generator's label and a EQ Alabama label are required to be on each container. No roll-offs will be stored on the forward 10' of the Roll-off Pad that slopes toward the swale to prevent contamination of the NPDES outfall in the event of a spill. Any incompatible wastes stored on the roll-off pad will be separated by the 6' x 6' curb located 100 feet from the east side of the pad. Additional incompatible wastes, that cannot be stored within the CSB, will not be accepted for storage until such time as one of the two areas on the roll-off pad becomes unoccupied. The southwest area of the roll-off pad is utilized by EQ Alabama as a pre-acceptance staging area. Prior to analysis performed for acceptance, roll-offs are stored in this area of this ROP along with empty roll-offs and box vans.

D·1c(3) Solids Bulking Pad

The solids bulking pad is used as a temporary area to consolidate like waste codes that contain no free liquids from small containers such as drums and totes into a roll-off container. The roll-off container is spotted on the Bulking Pad (BP) before the

beginning of the consolidation operation. After the consolidation or bulking operation has been completed, the roll-off container is removed from the bulking pad.

D-1c(4) Solids & Liquid Blending in Roll-Off Box at Bulking Pad

The bulking pad is used as a temporary area to consolidate compatible solid and liquid wastes from small containers such as drums and totes into a roll-off container. The roll-off container is spotted on the Bulking Pad (BP) before the beginning of the consolidation operation. Solid and liquid wastes are combined in the roll-off container such that the solid wastes absorb the liquids and no free liquids remain after mixing. After the consolidation or bulking operation has been completed, the roll-off container is removed from the bulking pad.

D-1c(5) Solids Stabilization in Roll-Off Box at Bulking Pad

The bulking pad is used as a temporary area to stabilize suitable solid wastes from small containers such as drums and totes into a roll-off container. The roll-off container is spotted on the Bulking Pad (BP) before the beginning of the stabilization operation. Solid wastes are added to the roll-off container. A stabilizing agent is introduced into the hazardous waste in order to immobilize contaminants and make the hazardous waste safe for land disposal. After the stabilization operation has been completed, the roll-off container is removed from the bulking pad.

D-2 TANK SYSTEMS

Since the EQ Alabama operation is a containerized storage facility ONLY, this section is not applicable.

D-3 SURFACE IMPOUNDMENT DESIGN

Since the EQ Alabama operation is a containerized storage facility ONLY, this section is not applicable.

D-4 WASTE PILE DESIGN

Since the EQ Alabama operation is a containerized storage facility ONLY, this section is not applicable.

D-5 INCINERATOR DESIGN

Since the EQ Alabama operation is a containerized storage facility ONLY, this section is not applicable.

D-6 LAND TREATMENT

Since the EQ Alabama operation is a containerized storage facility ONLY, this section is not applicable.

D-7 LANDFILL DESIGN

Since the EQ Alabama operation is a containerized storage facility ONLY, this section is not applicable.

D-8 INDUSTRIAL BOILERS AND FURNACES THAT BURN HAZARDOUS WASTES

Since the EQ Alabama operation is a containerized storage facility ONLY, this section is not applicable.

D-9 MISCELLANEOUS UNITS

Since the EQ Alabama operation is a containerized storage facility ONLY, this section is not applicable.

D-10 Discontinued Liquid Bulking Area

Upon review of previous correspondence between ADEM and TFIA, it was discovered that a liquid bulking operation was located in an un-contained gravel parking area. The liquid bulking operation was discontinued pursuant to correspondence with ADEM. The wastes were bulked in the area between July 12, 1996 and December 5, 1996. This area is considered a solid waste management unit and is located at the northern entrance to the container storage building. A vacuum tanker was backed into the Container Storage Building via the 12 foot rollup door to the north of the building and the truck extended outward into the gravel area north of the building. This area is referenced in Figure 1, Figure 2, and Figure 6 of the Figures Section of this application. The wastes that were bulked in this area consisted of the following waste codes:

- D001
- D006
- D007
- D018
- D035
- D036

Srnall Containers (drums and totes) of wastes that were to be bulked in this area were positioned in Area 4 (Rows 10 and 11). The tanker truck pumped the waste from containers in this area into its tank. The approximate dimensions of the liquid bulking

area would be approximately 50' x 12'. Most of this area occupied by the vacuum truck was inside the CSB but did extend out into the gravel area north of the building. There is no run-off from the building and drainage from the gravel area is to the south and east. No spills occurred during the liquid bulking operation.

D-11 Areas of Concern Identified in the Initial Facility Assessment

1) Areas of stained soils in the grubbed area near the discharge points for roll-off pad. The soil discoloration has receded in this area since the time of the initial photograph. The area is located to the south of the active facility and just past the roll-off pad. The closest active area near this point is the roll-off pad which stored filled roll-off boxes ready for disposal. These boxes most often contain CCA waste (Chromated Copper Arsenate) or ACO waste (Waste from Aqueous Copper Solution). The grubbed area spoken of in the initial facility assessment has been filled and the drainage way has been improved with concrete channeling.
2) Discolored area in drainage for gravel yard near bulking pad. The discolored area at the end of the bulking pad and close to the shipping and receiving dock was sampled and sent for testing. The results were supplied as part of a report supplied to ADEM prior to the most recent RCRA Facility Assessment (RFA). (See D-13 of this Section.) At this area bulking activities and shipping and receiving activities are conducted daily. All of the wastes brought into and out of the facility are handled near this point. Filled roll-off containers are sent out for disposal (Ex. Emelle, AL or Belleville, MI). Materials bulked in this area are most often CCA (Chromated Copper Arsenate) and ACO (Waste from Aqueous Copper Solution). These wastes are generated from the wood treatment industry.

D-12 Area of Concern Identified in the Most Recent Facility Assessment (November 2004)

1) Concrete block south and west of the facility. During the most recent RFA conducted by ADEM personnel, an additional AOC was identified to the south and west of the fenced in area closed to the roll-off pad. This AOC is a piece of concrete approximately 2' x 2'. The exact origins of the block are unknown. As nothing was identified beneath the block, the most likely possibility is that the block is a remnant of concrete generated when the concrete channeling system was poured to improve drainage to the south and west of the facility. The block was placed in a roll-off along with demolition debris from the bulk pad destined for disposal.

D-13 Information Provided in the RCRA Facility Assessment Preliminary Needs

Please refer to section L of this application for this information.

SECTION E

GROUNDWATER MONITORING

E-1 INTERIM STATUS MONITORING DATA

Since this operation is a containerized storage facility ONLY and not a surface impoundment, landfill, or land treatment facility, these requirements for groundwater monitoring are not applicable.

E-2 GENERAL HYDROGEOLOGIC INFORMATION

Since this operation is a containerized storage facility ONLY and not a surface impoundment, landfill, or land treatment facility, these requirements for groundwater monitoring are not applicable.

E-3 TOPOGRAPHIC MAP REQUIREMENTS

Since this operation is a containerized storage facility ONLY and not a surface impoundment, landfill, or land treatment facility, these requirements for groundwater monitoring and additional topographic map information are not applicable.

E-4 CONTAMINANT PLUME DESCRIPTION

Since this operation is a containerized storage facility ONLY and not a surface impoundment, landfill, or land treatment facility, these requirements for groundwater monitoring and contaminant plume description are not applicable.

E-5 GENERAL MONITORING PROGRAM REQUIREMENTS

Since this operation is a containerized storage facility ONLY and not a surface impoundment, landfill, or land treatment facility, these requirements for groundwater monitoring are not applicable.

E-6 DESCRIPTION OF DETECTION MONITORING PROGRAM FOR FACILITIES NOT DETECTING THE PRESENCE OF HAZARDOUS CONSTITUENTS

Since this operation is a containerized storage facility ONLY and not a surface impoundment, landfill, or land treatment facility, these requirements for groundwater monitoring are not applicable.

E-7 COMPLIANCE MONITORING PROGRAM FOR FACILITIES WHICH HAVE DETECTED PRESENCE OF HAZARDOUS CONSTITUENTS

Since this operation is a containerized storage facility ONLY and not a surface impoundment, landfill, or land treatment facility, these requirements for groundwater monitoring are not applicable.

E-8 CORRECTIVE ACTION PROGRAM

Since this operation is a containerized storage facility ONLY and not a surface impoundment, landfill, or land treatment facility, these requirements for groundwater monitoring are not applicable.

SECTION F

PROCEDURES TO PREVENT HAZARDS

F-1 SECURITY

F-la Security Procedures and Equipment

A waiver is not requested, therefore, a description of security procedures and equipment follows.

F-1a(1) 24-Hour Surveillance System

There is no formal 24-hour surveillance system available at the facility. There are residents across the road from the facility that may be aware of any unusual activity at the site after working hours. The primary means of security is provided by a fence as described below.

F-1a(2) Barrier and Means to Control Entry

F-1a(2)(a) Barrier

The primary means of security for the site is provided by a 6' high chain-link fence. The fence surrounds the entire site except for the front (west side) of the main building. There is one door into this side of the building and it is kept locked except when the building is attended.

F-1a(2)(b) Means to Control Entry

Sliding gates provide entry to the site at four locations as shown on the site drawing (Figure 2 located in the Figures section of this application). These gates are kept locked except when being used to permit access to vehicular traffic by EQ Alabama personnel present.

F-la(3) Warning Signs

Warning signs are located on the fence and at each gate in sufficient numbers so that they may be seen from any approach to the active portion of the facility, and inside the main building on the door that leads to the container storage area. The signs' letters are large enough to be legible at 25'. The signs read DANGER, UNAUTHORIZED PERSONNEL KEEP OUT'.

F-lb Waiver

A waiver of these requirements is not requested.

F-2 INSPECTION SCHEDULE

A copy of the general inspection schedule for this facility is shown in Attachments F located at the end of this section. This schedule will be followed by EQ Alabama personnel.

F-2a General Inspection Requirements

In accordance with the facilities inspection schedule, EQ Alabama personnel conduct regularly scheduled inspections of facilities, equipment, structures, and containers on the site. These inspections look for malfunctions and deterioration, operator errors, and discharges which may be causing, or may lead to, the release of hazardous waste constituents to the environment or a threat to human health. The schedule of inspections is of sufficient frequency to identify problems in time to correct them before they harm human health or the environment.

The facility inspection schedule specifies for each listed item, the area, or operation, the

frequency of inspection, and the types of problems to look for during the inspection.

In addition to the facility inspections identified in this section, the dry chemical fire suppression system is inspected twice a year by an outside contractor. The cylinders are removed and pressure tested; each nozzle is inspected; and all electrical components are inspected.

The following equipment is included on the inspection schedule with the frequency of inspection and a description of what to look for during inspection:

Safety and Emergency Equipment

-Smoke-Detector

-Respirators

-Hand Held Radio Communication System

-Fire Extinguishers

-First Aid Equipment and Supplies

-Decontamination Equipment

-Protective Clothing

-Grounding Terminal

-Dry Chemical Fire Suppression System

* Security Equipment

-Perimeter Fence

-Sliding Gates

-Locks on all gates and building doors

*Operating and Structural Equipment

-All concrete pads and foundations both indoors and outdoors

-All concrete curbs for containment

- Ventilation equipment in the main building

- Portable sump pumps and hose (or equivalent) to be used for containment liquid pumping

- All loading docks and unloading areas

- Any other area where a spill may occur

- Rain Curtain

F-2a(1) Types of Problems

The inspection schedule identifies the types of problems to look for during the inspection. These are listed under the column titles "What To Look For". Structures such as concrete pads and containment curbs are inspected for cracks, deterioration, or corrosion. Security devices are inspected for condition and operability. Safety and security equipment is inspected for battery condition, availability, supply, and condition. Decontamination equipment and protective clothing are inspected for supply, condition, and availability.

F-2a(2) Frequency of Inspection

A description of the inspection frequency for all storage areas, structures, equipment, and supplies is shown in the right hand column of the inspection schedule, labeled "Inspection Frequency". In general, the frequency of inspection is based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections.

Areas subject to spills, such as loading and unloading areas, are inspected daily when in use.

Daily Inspection:

All container storage areas, including the corrosive/reactive and general container storage areas in the container storage building, the roll-off pad and the bulking pads are inspected daily for signs of spills or possible breach in containment structures such as curbs and concrete pads.

The unloading areas on both sides of the main building will also be inspected daily, when the facility is in operation, for signs of spills. For purposes of facility inspections, “Daily” will mean each day that the facility is staffed by process operators and is operating.

Inspection Log: An inspection log is completed for each daily inspection as specified in F-2d below. A copy of the Daily Inspection Log or equivalent, is shown on Attachments F at the end of this section.

F-2b Specific Process inspection Requirements

The inspection schedule for the EQ Alabama, Inc. facility includes the items and frequencies as shown in the sections that follow:

F-2b(1) Container Inspection

Although only a weekly inspection is required by ADEM, all containers of hazardous waste stored on the site in the container storage building, or the roll-off storage area are inspected daily. This includes all drums, roll-offs, trailers, and any other container holding hazardous material. The containers are inspected for leaks, spills nearby, and any deterioration caused by corrosion or other factors. Any containers found to be leaking or deteriorated, are reported to the facility manager as soon as possible.

Prior to beginning the bulking operation, the tank on the vacuum truck is inspected for signs of deterioration or structural deficiencies. Once the bulking operation is complete the tank is inspected again prior to leaving the site for leaks or spills nearby. Additionally, all covers and closure devices are inspected to ensure that they are in the closed position and that there are no visible cracks, holes, gaps, or other open spaces into the interior of the container. Any deficiencies are reported to the facility manager as soon as possible. A copy of an inspection log for the vacuum truck is located at the end of this section. The inspections will be performed with the assistance of the vacuum truck operator.

Any leaking containers are over-packed. If a leak is detected in the vacuum truck the truck will either be repaired or emptied into individual drums or into an additional tanker truck.

The label on each container is located and inspected for legibility and secure attachment to the container. Any labels which are missing, obscured, or not attached securely are replaced. The container storage areas are inspected weekly for leaks, spill and deterioration of concrete pads, concrete curbs, and drum storage racks caused by corrosion or other factors. If any of these conditions *are* encountered, they are reported to the facility manager who arranges for their repair.

In some cases, inspection of containers may include drums stacked two high. EQAL will utilize a step-ladder, an elevated man basket, or equivalent for the purpose of inspecting the top of the second level. This upper level will be inspected in the same manner in which all other levels are inspected.

The Daily Inspection Log or current revision, which will be at least as stringent and detailed as the example inspection log shown in Attachment 2, for containers and container storage areas will be completed at the time of inspection. This log will be completed as described in Section F-2d.

F-2b(2) Tank System Inspection

Since this facility is a containerized storage facility ONLY, this section not applicable.

F-2b(3) Waste Pile Inspection

Since this facility is a containerized storage facility ONLY, this section not applicable.

F-2b(4) Surface Impoundment Inspection

Since this facility is a containerized storage facility ONLY, this section is not applicable.

F-2b(5) Incinerator Inspection

Since this facility is a containerized storage facility ONLY, this section is not applicable.

F-2b(6) Landfill Inspection

Since this facility is a containerized storage- facility ONLY, this section is not applicable.

F-2b(7) Land Treatment inspection

Since this facility is a containerized storage facility ONLY, this section is not applicable.

F-2b(8) Miscellaneous Unit inspection

Since this facility is a containerized storage facility ONLY, this section is not applicable,

F-2c Remedial Action

When the inspection of a container reveals a leak or damage which may signal an imminent leak, the facility manager is notified. The container is then over-packed. If a leak is detected in the vacuum truck the truck will either be repaired or the contents will be emptied into individual drums or into an additional tanker truck. Once the over-pack or material transfer is accomplished, any spill is cleaned up. Any container labels missing, obscured, or not attached securely, will

be replaced with a new label. Any damage to a containment system, such as a concrete pad or a concrete curb, is repaired by patching or reconstruction as determined by the facility manager. Any damage to a drum storage rack is repaired as directed by the facility manager.

F-2d Inspection Log

A copy of the daily and weekly inspection log is located in Attachments F at the end of Section F. These inspection logs include the following:

* dates and times of inspections
* name of inspector
* observations made
* date and nature of repairs or remedial actions taken and the initials of the person completing them

The inspection logs will be kept on file on site for a period of three years.

Additionally, a copy of the inspection log for the vacuum truck is included in Attachments F at the end of Section F. This inspection log will be completed, with the assistance of the vacuum truck operator, when the vacuum truck is on site.

F-3 WAIVER OF PREPAREDNESS AND PREVENTION REQUIREMENTS

A waiver of preparedness and prevention requirements is NOT requested.

F-3a Equipment Requirements

Due to the hazards posed by waste handled at the EQ Alabama facility, the facility has the following equipment:

A. Communications and alarm systems

1. telephone
2. on-site alarm system
3. radios

B. Fire Protection

1. grounding terminal for vacuum truck
2. dry chemical fire suppression system
3. fire extinguishers

C. Personal protective equipment

1. safety glasses
2. hard hats
3. over-gloves
4. splash shields
5. protective suits/aprons
6. chemically resistant boots
7. cartridge respirators

D. Decontamination equipment

1. emergency showers
2. eye wash
3. hand held 5-gallon sprayer
4. plastic tub
5. open top 55-gallon drums

E. Spill Control Equipment

1. spill control booms
2. sorbent pads
3. oil dry
4. lime
5. empty 55-gallon drums
6. 85-gallon over-pack drums
7. forklift barrel clamp
8. non sparking hand tools and shovels

In order to ensure the operability of the equipment, it is evaluated weekly for proper operation. The equipment is also maintained according to the manufacturer's recommendations.

F-3a(1) Internal Communications

Two hand-held, two channel, two-way radios are utilized by EQ Alabama personnel. One radio is kept in the front office by the facility manager/emergency coordinator and the second radio is carried by warehouse personnel. In this way both the emergency coordinator and warehouse/facility personnel have a method of internal communication as well as a method for summoning emergency assistance. An internal phone system with a pager/speaker system is another method of internal communication between AQAL personnel. A portable air horn can also be utilized as back-up method of internal communication. The two-way radios may utilize two frequencies.

One frequency is the Lamar County Emergency Management Agency frequency, 155.175 mhz. The other frequency is an alternate frequency for communication with other personnel on site. The radio is set on the alternate frequency during normal operations. Any emergency may be broadcast on this radio. In addition to any broadcast on the radio, an emergency will be signaled by one long blast on the hand held air horn.

F-3a(2) External Communications

Telephones will be used to request emergency support from local fire department, police, emergency medical, or other agencies. The nature of the emergency and the facility location, at minimum, will be provided.

F-3a(3) Emergency Equipment

The following equipment is required at this facility due to the -hazards posed by the waste handled here:

Fire Control Equipment - Portable fire extinguishers are positioned as follows:

1. There are three portable extinguishers inside the Container Storage Building. The locations of the extinguishers are shown on Figure 2 in the Contingency Plan.
2. There are also four additional fire extinguishers located throughout the facility as shown on Figure 2 in the Contingency Plan.

Dry Chemical Fire Suppression System

The facility is currently equipped with a dry chemical fire suppression system. The fire suppression system can be activated automatically or manually. A diagram of the system is shown as an attachment to the contingency plan.

Spill Control Equipment - Although any area which is used to store hazardous liquids is surrounded by a containment area, the ability to contain the spill to as small an area as possible will minimize the clean up effort required. Therefore, EQ Alabama maintains spill control booms as well as sorbent materials. Spill control equipment includes:

1. Spill Control Booms
2. Sorbent Pads
3. Oil Dry
4. Lime
5. Spare 55-gallon drums

6 85-gallon over-packs

7. Barrel clamp for the forklift truck

Decontamination Equipment - A decontamination shower and eyewash station is located inside the container storage area of the main building. The location is shown on Figure 2 in the Contingency Plan. A portable plastic decontamination reservoir is also available in the immediate area.

F-3a(4) Water for Fire Control

In accordance with- NFPA 30, the container storage building is an unprotected building that conforms to the definition of "protected for exposures" in that it is located a minimum of 100' from exposed buildings or adjoining property that can be built, on. - Fire control is primarily to be supplied by the Sulligent and Vernon fire departments which will respond with the proper equipment. Additionally, the facility is equipped with a dry chemical fire suppression system. The fire suppression system is an automatic system that can also be activated manually. The dry chemical fire suppression system is noted in the Contingency Plan. The facility is currently only supplied by well water.

F-3b Aisle Space Requirement

Sufficient aisle space is provided in the container storage area of the main building for inspection of containers and to take preliminary emergency

response action to stop leaks and to contain spills. The two foot minimum aisle space provides space on one side of each row of containers for detection of leaks and movement of emergency personnel and equipment where needed. A forklift and moveable "A" frame are used to gain access to a container in the event of an emergency.

F-4 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT

A description of procedures, structures, and equipment used at this facility for the following purposed are listed:

F-4a Unloading Operations

Please refer to Section D-1c(1) for additional information regarding incompatible wastes. Typically, liquids are received at EQ Alabama by trailers in 55-gallon drums. They are offloaded one at a time using a fork truck with a barrel clamp attachment.

Liquid wastes will be off-loaded at the loading dock of the container storage building. The loading docks allow the forklift truck to drive onto the trailer and pickup individual drums. The use of the barrel clamp is less hazardous than "Manhandling" individual drums. Once off the trailer, the drums are placed on wood pallets. When the trailer is empty, the barrel clamp attachment is removed and the pallets, with four drums each, are moved by forklift truck into the storage areas. These procedures minimize hazards during unloading operations.

F-4b Run-Off

Run-off is prevented from moving from hazardous waste handling areas to other parts of the facility by secondary containment structures with minimum 6" curbs surrounding them. The container storage area in the main building is curbed and protected from rain by being inside the building. (The reactive/corrosive waste container storage area is curbed to prevent any spill from moving into the rest of the container storage area.) The Roll-Off Pad storage area is curbed to prevent rainwater run-on. The Bulking Pad is sloped to contain liquids in the northernmost area surrounded by 6" x 15" curb on the west side and the concrete block wall of the loading dock on the north and east sides. The slope is set at a 6 3/4" rise with 19 3/4" run with the lowest part of the slope positioned toward the north.

F-4c Water Supplies

Water supplies are provided by a piping system under pressure. Contamination is prevented by the positive pressure and separation of the piping from any of the hazardous waste containment systems.

F-4d Equipment and Power Failure

Since this facility is containerized storage facility ONLY, a temporary power outage would not cause a dangerous situation. Primary emergency communication is done with battery powered radios. None of the emergency or decontamination equipment would be affected by a power loss.

F-4e Personal Protection Equipment

Under normal operations the only possible exposure of personnel to hazardous waste would be during a bulking operation. Bulking operations are performed on solids with no free liquids and liquid wastes. During bulking operations personnel wear dust suits, boots, gloves and respirators.

During the initial container inspection when wastes are received at the facility, personnel will wear the appropriate PPE for the waste shown to be in the container.

F-5 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE WASTES

F-5a Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes

Reactive wastes are stored in the Reactive/Corrosive waste storage area (Area 1) in the container storage building. The container storage building is shown on Figure 3 located in the Figures section of this application. These wastes are stored in sealed containers, which are not opened. The reactive storage area inside the container storage building is vented by large vent fans built into the walls of the building.

"No Smoking" signs are located in the reactive storage area of the container storage building.

Under no circumstances will two incompatible wastes be stored in the same area in the container storage building. Should the reactive/corrosive area already contain waste, the incompatible waste will be stored outside that area in the CSR. If both areas are occupied the incompatible waste will not be accepted for storage within the facility until such time as one of the two areas becomes unoccupied.

Smoking is prohibited at this facility except in the designated smoking area (the break area and just outside the break area). Sources of ignition will be kept away from reactive and ignitable wastes in their storage areas as follows:

*Open Flames Are Prohibited

*Smoking Prohibited

*Cutting and Welding - Prohibited when ignitable or reactive wastes are present.

*Hot Surfaces - Precaution is taken to prevent.

*Frictional Heat - Liquid containers are handled in a way that prevents frictional heat.

*Sparks (static, electrical, or mechanical) - Any equipment used is non-sparking. During the bulking of ignitable liquids, the vacuum truck will be connected to a grounding terminal to minimize the risk of static sparks.

*Spontaneous Ignition - Areas are kept free of any potential sources of spontaneous ignition such as rags or oily debris of any kind.

*Radiant Heat - There are no sources of radiant heat in either area.

F-5b General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste

This facility is a containerized storage facility ONLY and ignitable or reactive wastes are kept in sealed containers except when bulking of liquid ignitable wastes is performed. The precautions to prevent ignition of ignitable wastes identified in section F-5a will be followed during the any bulking operation. In the event that a container with reactive or ignitable liquid is damaged or leaking, special precautions are taken. The damaged container will be over-packed. In the event that the proposed vacuum truck is damaged or leaking, the truck will either be repaired or the contents will be emptied into individual drums or into an additional tanker truck.

Under no circumstances will reactive wastes be removed from their containers except for consolidation. All containers are inspected upon their arrival at the facility and daily thereafter. Leaks, container damage, and proper labeling are noted. Each storage area is inspected daily for leaks and spills. Any potential release of waste is therefore prevented or detected early. Any potential buildup of fumes is prevented by ventilation as described in F-5a above.

F-5c Management of Ignitable or Reactive Wastes in Containers

Containers of ignitable and reactive waste are stored at least 15 meters (50 feet) from the facility's property line. The distances are illustrated on the site drawing labeled Figure 6 located in the Figures section of this application.

F-5d Management of Incompatible Wastes in Containers

Under no circumstances will dissimilar wastes be mixed together in the same container. Bulking of wastes with no free liquids will only be done with containers

of wastes with like waste codes. Bulking of liquid wastes will only be done with compatible waste materials that meet the specifications of the facility that will receive the waste. Nitric acid wastes will be separated by the dike located in Area 1 (as shown on Figure 3 located in the Figures section of this application) from any other corrosives. Cyanide wastes will be separated by the dike located in Area 1 from any acid wastes. All oxidizers will be separated by the dike located in Area 1 from any organic fuel source, such as petroleum products.

F-5e Management of Ignitable or Reactive Wastes in Tanks

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5f Incompatible Wastes in Tanks

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5g Ignitable or Reactive Wastes in Wastes Piles

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5h Incompatible Wastes in Waste Piles

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5i Ignitable or Reactive Wastes in Surface Impoundments

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5j Incompatible Wastes in Surface impoundments

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5k ,Ignitable or Reactive Wastes in Landfills

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5l Incompatible Wastes in Landfills

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5m Ignitable or Reactive Wastes in Land Treatment

Since this is a containerized storage facility ONLY, this section is not applicable.

F-5n Incompatible Wastes in Land Treatment

Since this is a containerized storage facility ONLY, this section is not applicable.

ATTACHMENTS
F

US ecology

EQ Alabama, Inc.

Sulligent, AL

Daily Inspection Log

Month _____ Year _____

	Mon.	Tue.	Wed.	Thur.	Fri.	Sat.	Sun.
Date of Inspection:							
Time of Inspection:							
Inspected by:							
CONTAINER STORAGE BUILDING							
General Container Storage Area							
Number of Drums (55 gal)							
Number of Cubic Yard Boxes							
Number of Pails							
Containers - Label							
Containers - Condition							
Pallets - Condition							
Floor and Curbs							
Aisle Space							
Corrosive/Reactive Area							
Number of Drums (55 gal)							
Number of Cubic Yard Boxes							
Number of Pails							
Containers - Label							
Containers - Condition							
Floor and Curbs							
Aisle Space							
Loading Dock/Bulking Pad							
Floor and Curbs							
Rain Curtain							
ROLL-OFF PAD							
Number/Type of Containers							
Roll-off Label							
Roll-off Cover & Condition							
Storage Vans Label							
Storage Vans Condition							
Concrete Floor & Curbs							
Spacing							
SITE SECURITY							
Fences							
Gates							
Locks							
Warning Signs							
Lighting							
NPDES - Daily Rainfall in Inches							
Rainfall							

1. Daily Inspections are conducted only on days the facility is operating.
2. Mark satisfactory items with a check. Unsatisfactory items will be marked with (x) and explained in the space on the back of this sheet. The remedial action will be added with a date, time, and initials of the employee completing the action.

EQ Alabama, Inc.

Sulligent, AL

Weekly Inspection Log

Date/Time: _____

Inspector: _____

EQUIPMENT TYPE	WHAT TO LOOK FOR	☑ = PASS	☒ = FAIL	
MONITORING EQUIPMENT				
Smoke Detector	Battery OK/Function Test			
Radios	Battery OK/Function Test			
SAFETY AND EMERGENCY EQUIPMENT				
Respirators	Availability and Condition			
Eye Wash & Safety Showers	Clear Adequate Flow			
Fire Extinguishers	Charge			
Dry Chemical Fire Suppression System	General Condition/Siren Test			
First Aid Equipment	Supply and Condition			
Decontamination Equipment	Supply and Condition			
Protective Clothing	Availability and Condition			
Spark Proof Shovels	Availability and Condition			
OPERATING AND STRUCTURAL EQUIPMENT				
Number of Empty Drums Available	Empty Drum Count		= Number	
Spill Control and Collection Equipment	Supply			
Absorbant Pads	Bales			
Floor Dry	Bales			
Calcium Carbonate (lime)	Bags			
Roll-off Pad				
Vans - Containers within	Label			
Vans - Containers within	Condition			

Unsatisfactory items will be marked with an (X) and explained in the space on the back of this page. The remedial action will be added with a date, time and initials of the employee completing the action.

EQUIPMENT TYPE	WHAT TO LOOK FOR	INSPECTION FREQUENCY
MONITORING EQUIPMENT		
Smoke Detector	Battery OK Functional Test	Weekly
Radios	Battery OK Functional Test	Weekly
SAFETY AND EMERGENCY EQUIPMENT		
Respirators	Availability and Condition	Weekly
EyeWash & Safety Showers	Clear Adequate Flow	Weekly
Fire Extinguishers	Charged and Condition	Weekly
Dry Chemical Fire Suppression System	General Condition and Siren Test	Weekly
First Aid Equipment	Supply and Condition	Weekly
Decontamination Equipment	Supply and Condition	Weekly
Protective Clothing	Availability and Condition	Weekly
Spark Proof Shovels/Tools	Availability and Condition	Weekly
SECURITY DEVICES		
Fence	Condition	Daily
Gates	Operability	Daily
Locks	Operability	Daily
Warning Signs	Availability and Condition	Daily
OPERATING AND STRUCTURAL EQUIPMENT		
Spill Control & Collection Equipment	Supply and Condition	Weekly
Absorbent Pads	Supply and Condition	Weekly
Floor Dry	Supply and Condition	Weekly
Calcium Carbonate (Lime)	Supply and Condition	Weekly
Containment Curbs	Cracks, Wear, General Condition	Daily
Container Storage Pads Concrete	Cracks and General Condition	Daily
Containers	Labels and Condition	Daily
Rain Curtain	General Condition	Daily
Vacuum Truck	General Condition	Before Bulking Liquid
Grounding Terminal	General Condition	Before Bulking Liquid

1. Daily Inspections are conducted only on days the facility is operating.
2. Mark satisfactory items with a check. Unsatisfactory items will be marked with (x) and explained in the space on the back of this sheet. The remedial action will be added with a date, time, and initials of the employee completing the action.

Destination Facility: **Date:** _____

_____ **Inspector:** _____

What to Look For	Yes	No	Comments
Prior to Bulking Liquids			
Is tank in good condition?			
Is grounding terminal in good condition?			
Is truck connected to grounding terminal?			
Has pre-approval been received for all waste containers to be bulked?			
Is total volume of containers to be bulked less than the available space in the vacuum truck?			
During Bulking Operations			
Are any leaks detected during the connection of hoses to vacuum truck?			
Are any leaks detected during the disconnection of hoses from the vacuum truck?			
After Bulking Operation Is Complete			
Is vacuum tank leaking?			
Have all valves been closed and hoses disconected?			
Have the correct labels and/or placards been placed on the truck?			
Has the truck been disconnected from the grounding terminal?			
Have all domes, manways, or other openings been closed on the vacuum tank?			

Nore: The vacuum truck will be inspected each time it is on site to bulk liquid wastes.

SECTION G

CONTINGENCY PLAN

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G-1 GENERAL INFORMATION

This Contingency Plan has been prepared for EQ Alabama, Inc. (EQAL), formerly known as Terra Storage Facility, Inc. (TSF) at 51328 Highway 17 in Sulligent, AL. The facility is owned and operated EQ Alabama, Inc. and is located in Lamar County. The facility is a hazardous waste storage, treatment, and transfer facility which services off-site generators with storage of hazardous waste in drums, barrels, kegs, pails, boxes, cartons, cases, totes, bags, roll-off containers and box vans. The facility also provides bulking of liquid hazardous wastes from small containers (drums and totes) into vacuum trucks, bulking of solid hazardous wastes in roll-off boxes, stabilization of hazardous wastes in roll-off boxes, and solidification of hazardous waste liquids/sludges and solids in roll-off boxes.

A site plan is located in Section G Attachments as Figure 1.

The following waste codes are accepted under RCRA Part B status:

All characteristic wastes:
D001 through D0430.

The following process wastes:
F001 through F012, F019 through F028, F032, F034, F035, F037, F038, F039.

The following waste from specific sources:
K001 through K011, K013 through K052, and K060 through K062.

K064 through K066, K069, K071, K073, K083 through K088, K090, K091, K093 through K118, K123 through K126, K131, K132, K136.

The Following Off specification toxic wastes carrying a "U" code:
U001 through 0012, U014 through U039, U041 through U053, U055 thorough U064, U066 through U099, U101 through U103, U105 through 0138, U140 through 0174, U176 through U194, U196, U197, U200 through U211, U213 through U223, U225 through U228, U234 through U240, U243, 0244, U246 through 0249, U279, U359, U409, and U411.

The Following Off Specification toxic wastes carrying a “P” Code:
P001, P008, P012, P024, P039, P042, P046, P075, P081, P108, and P188.

These waste codes consist of characteristic waste including all TCLP waste codes; generic waste such as solvents, wastewater treatment sludges, and plating bath solutions; heavy ends and distillation bottoms from specific sources; and discarded commercial products.

Ignitable wastes (D001) and reactive wastes (D003) have been included. Also PCBs are accepted for storage.

The container storage building has the capacity to store about 1168 drums or 86,640 gallons or more of waste depending on the size of the container, such as a 350 gallon tote. (Ex. Area 1 has a capacity of 12,850 gallons if the largest potential container is a 350 gallon tote. If the area only contains 55-gallon drums, capacity is reduced to 10,560 gallons or 192 drums. Therefore, the above mentioned gallon capacity is not based solely on 55 gallon drums) There is also an area, within the container storage building, designated for liquid bulking operations. The liquid bulking operation will use a vacuum truck trailer with a capacity of no more than 6,000 gallons. Therefore the total storage capacity of the container storage building will increase to over 92,640 gallons due to the addition of the proposed liquid bulking operations. If Area 1 through 5 contains more than 86,640 gallons of waste, bulking operations utilizing the 6,000 gallon tanker may not be performed until the volume of waste inside the building is reduced to 86,640 gallons or less. The roll-off storage area has the capacity for about 392,700 gallons.

G-2 EMERGENCY COORDINATOR

The Emergency Coordinator(s) (EC) is fully familiar with all operations, equipment, and activities on the site. This individual is knowledgeable about the contents of the Contingency Plan. The EC is authorized to shut down operations when necessary and to commit the resources needed to carry out this Contingency Plan. The Emergency Coordinator and alternates are as follows:

Primary	**Address**
Shanda Murff	454 Springs Creek Road
205-712-9324 - cell	Sulligent, AL 35586
205-698-0195 - home	
205-698-8915 - work	
Alternates	
Andrew Wilson	60093 Country Lane
662-305-7270 - cell	Amory, MS 38821
205-698-8915 - work	

The duties of the Emergency Coordinator are given in detail in the Emergency procedures section of this plan. At least one of the individuals listed will either be on-site or on call at all times. The EC has the responsibility of coordinating and delegating all emergency response measures in the absence of other emergency response personnel (e.g., fire and police officials).

G-3 IMPLEMENTATION

This Contingency Plan has been prepared, in accordance with 40 CFR 265 Subpart D and ADEM Administrative Code Rule 335-14-5-.04, 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. It is anticipated that most releases of hazardous materials can be handled by facility personnel without outside assistance. However, in the event of a major release, outside assistance will be sought.

The provisions of this plan are to be implemented immediately, whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The Contingency Plan describes actions to be taken to respond to fires, explosions or any unplanned release of hazardous waste constituents to air, soil, or surface water. The actions to be taken are fully described in the Emergency Procedures section of this plan.

G-4 EMERGENCY RESPONSE PROCEDURES

G-4a Notification

Personal 2-way radios and cell phones will be used to communicate problem situations within the plant. If outside assistance is necessary telephones or cell phones will be used to summon fire department, emergency response, or police assistance using the 911 system.

Telephones are located throughout the offices and the inside operation areas to communicate both within the facility and with outside agencies. An alarm system (air horn) is in place to alert facility personnel in the event of an emergency. One long signal means that everyone should evacuate the area by the nearest emergency exit. Two short signals mean that there is a localized problem which is not dangerous to workers. Two long signals mean that all is clear.

When there is a spill or other release of hazardous waste or hazardous waste constituents (from a fire, explosion or any other unplanned or otherwise emergency incident) the Emergency Coordinator (EC), or one of the alternates, must be alerted or contacted immediately.

LAMAR COUNTY
ENPERGENCY MANAGEMENT AGENCY
1118 COUNTY RD 9
P. 0. BOX 711
VERNON, AL 35592
PHONE: (205) 695-7105 EMAIL: lamar911@midsouth.com

7 January 2003

Terra First Alabama Storage
51328 Hwy 17 P.
0. Box 1259
Vernon, AL 35592

Dear Sirs,

This is authorization for Terra First to use Lamar County EMA frequency (155.175). •

RAL

PH HARRISON
Coordinator

The emergency procedures listed below are carried out by the EC. In the event that there is imminent danger, personnel must be evacuated immediately, or when someone is seriously injured. The first person noticing the emergency event is responsible for initiating the proper response. Immediately after the response is initiated, the EC will be notified.

1. Whenever an imminent or actual emergency occurs, the Emergency Coordinator, or authorized designee, will perform the following:
    a. Activate alarms and/or communication systems that will alert all facility personnel.
    b. Notify appropriate state and local agencies that have designated response roles, if it is deemed that their support is required. If such response is required, the EC will assist the agencies with their response efforts.

G-4b <u>Identification of Hazardous Material</u>

If a release, fire, or explosion occurs, the EC will identify the character, exact source, amount, and the area affected by any released materials by reviewing facility records or manifests and, if deemed necessary, by chemical analysis. In the latter situation, a chemist will be summoned or consulted.

G-4c <u>Hazard Assessment</u>

The EC will also assess possible hazards to human health or the environment

that may have resulted from the emergency. This evaluation will consider both the direct and indirect consequences such as the effects of toxic, irritating, or asphyxiating agents generated by the emergency, any surface water run-off or chemical agent used in fire control, and/or heat-induced reactions or explosions.

If the EC concludes that an emergency has occurred that could threaten human health or the environment outside the facility property boundaries, he will immediately notify the ADEM at 1-800-843-0699 or the National Response Center (NRC) at 1-800-424-8802 and the following will be reported:

-name and telephone number
-name and address of the facility
-time and type of incident
-name and quantity of material(s) involved, to the extent known
-extent of injuries, if any; and
-possible hazards to human health or the environment outside the facility

G-4d <u>Control Procedures</u>

During the emergency the EC will take all reasonable measures to minimize the potential for reoccurrence and the spread of fires, explosions, and

releases to other facility areas. These measures may include stopping operations, collecting and containing released wastes, and removing or isolating materials.

G-4e Prevention of Recurrence or Spread

During the emergency, the coordinator must take measures to ensure that emergencies do not recur or spread to other hazardous waste at the site. These actions, depending on the situation, could include collecting and containing wastes (referred to above), and removing or isolating containers to which the emergency may spread. If operations are not already discontinued, this action may be taken to ensure containment of the emergency.

G-4f Storage and Treatment of Released Material

The Emergency Coordinator will monitor for leaks, gas generation, or other problems after the material has been contained.

After the emergency has been controlled, the EC will provide for the storage or disposal of recovered wastes and/or contaminated materials.

G-4g Incompatible Wastes

The Emergency Coordinator will ensure that no waste, which is incompatible with the released material, is stored nearby.

G-4h Post Emergency Equipment Maintenance

The Emergency Coordinator will ensure that all emergency equipment that was used is cleaned and fit for its intended use before suspended operations are resumed.

G-4i Container Spills and Leakage

In the event of an emergency involving a spill of hazardous materials in the storage areas, the following procedures are employed for rapid, safe response and control of the incident. If a spill is discovered, the EC (or alternate) is contacted immediately. The EC will then obtain information pertaining to the following:

- type of material spilled or released;
- location of the release or spillage of hazardous material;
- estimate of quantity released and the rate at which it is being released;
- direction in which the spill or vapor release is heading;
- any injuries involved;
- fire and/or explosion hazard; and
- area and materials involved and the intensity of the fire or explosion, if any.

This information will aid the EC in assessing the magnitude and seriousness of the spill or vapor release. The EC will contact and deploy the necessary response personnel. If necessary and/or appropriate, he will also contact local, state, and federal agencies for assistance. The EC will:

- ensure that all unnecessary personnel are removed from the affected area;

- authorize the removal of all ignition sources if a flammable waste is involved, and utilize spark proof equipment in containment operations; authorize the removal of all surrounding incompatible materials;

- notify the fire department to respond with foam equipment and hoses if the spilled materials are flammable;

- direct plant personnel to contain, divert, and clean up spills of non-ignitable hazardous wastes which have hot been contained by dikes or sumps by using earth moving equipment and other materials as appropriate;

- notify civil authorities if the nature of the incident threatens life or property outside the facility or if `RQ' (reportable quantity) is involved. When in doubt, report an `RQ' to the National Response Center at 1-800-424-8802,theADEMat1-800-843-0699 and the Local Emergency Planning Committee at (205) 932-5966. Report PCB incidents to the NRC;

- order all plant personnel to evacuate and move upwind of the facility should a toxic vapor or mist be present, or if the formation of such vapor/mist exist;

- in case of a chemical injury, call Lamar Regional Health Center at (205) 698-7111. Information required by the staff will include:

    - number injured

    - chemical involved

    - estimated arrival time at Center

    - any emergency procedures already performed including initial decontamination

    - name and telephone number of person to contact for additional information

    - company physician

- direct plant personnel to place all recovered wastes and/or contaminated soil in containers for removal to an approved disposal site

- direct plant personnel to decontaminate non disposable equipment on site using an open head container or plastic tub and hand held sprayer. The equipment wilt be thoroughly rinsed with a compatible solvent or cleaning compound

- immediately following an emergency, the EC will make arrangements for disposal of the waste resulting from the emergency, handling the contaminated material as hazardous until a determination of the degree of hazard can be made. This determination will be made according to ADEM Admin. Code Chapter 335-14-2 and the facility waste analysis plan. The residue from wash water used to decontaminate equipment, will be drained into a tight head container, sealed, and disposed of in accordance with federal and state regulations. Clothing will either be disposed of or the residue from decontaminating the clothing will be disposed of in accordance with federal and state regulations.

Special Case Release

Fire and/or Explosion

The fire department will be notified, via phone during all general facility emergencies. If a fire occurs, emphasis will be on preventing the fire from

spreading to other hazardous waste management units or offsite. The following actions will be taken in the areas affected by a fire or explosion:

a, Personnel will be notified of fire by two-way radio or alarm.

b. All personnel not actively involved in fighting the fire, will evacuate the area. Personnel fighting fires will use available extinguishers at base of fire. Additionally, the dry chemical fire suppression system will be activated automatically, or manually, during a fire.

c. All injured individuals will be removed, and medical treatment will be administered by qualified personnel.

d. All ignition sources within the area will be eliminated.

Fires which cannot be readily controlled by plant personnel using available fire extinguishers or the dry chemical fire suppression system will be handled exclusively by the fire department.

The Emergency Coordinator will provide fire fighting personnel with information concerning known hazards.

G-4j <u>TANK SPILL AND LEAKAGE</u>

This section does not apply as no tanks are used in managing hazardous wastes at the facility.

G-4k <u>SURFACE IMPOUNDMENTS-SPILLS, LEAKAGE, AND SUDDEN DROPS</u>

No such waste management units are used at the facility; this section does not apply.

G-5 EMERGENCY EQUIPMENT

Equipment on site consists of:

	Location	Minimum Quantity.
A. Communications and alarm systems		9 total
1. telephone (Equipped with a pager/P.A. system)	Office, Warehouse	5 in the office area 2 in the warehouse 1 in the break room
		1 air horn
2. on-site alarm system	Office	2 total
3. radios	Office, Warehouse	1 kept in the office 1 worn by warehouse personnel
B. Fire Equipment		7 total
1. Fire extinguishers	See Figure 2	1 system (11 cylinders)
2. Dry Chemical Fire Suppression System	See Figure 3	
C. Personal Protective Equipment		Supplied to Personnel with spares in storage.
1. safety glasses		
2. hard hats		
3. over-gloves		
4. splash shields		
5. Protective suits/aprons		
6. Chemically resistant boots		
7. cartridge respirators		

D. Decontamination equipment

1. emergency shower	See Figure 2	1
2. eye wash		1
3. hand held 5 gallon sprayer		2
4. plastic tub		3
5. open top 55-gallon drums		2

E. Spill Control Equipment — See Figure 2

1. spill control booms	8 to 10'
2. sorbent pads	200 — 18"
3. oil dry	100 lb
4. lime	100 lb
5. empty 55-gallon drums	2
6. 85-gallon over-pack drums	2
7. forklift barrel clamp	1
8. non sparking hand tools and shovels	2 sets

Portable dry chemical extinguishers are located as shown in Figure 2.These fire extinguishers are appropriate for the types of waste which are handled at this facility. Additionally, a stationary dry chemical fires suppression system is located in the container storage building. The system is designed to operate automatically in the event of a fire; however, the system can also be operated manually. According to the system inspectors, Global Fire Sprinklers, LLC. the system provides sufficient fire protection for the bulking of ignitable liquids within the container storage area.

Personal protective equipment is located in the area shown on Figure 2. This equipment consists of safety glasses, splash shields, hard hats, over-gloves, protective suits and aprons, over boots and cartridge respirators. This equipment protects personnel from injuries that could occur from the handling of drums and roll-off containers. The wastes that are stored do not warrant more extensive personal protective equipment.

Decontamination of personnel can be accomplished by use of the eyewash or safety shower shown on Figure 2. ANSI recommends plumbed eyewashes provide 0.4 gallons of water per minute, whereas, the flow for a safety shower should be 20 gallons per minute. Eyewashes and showers should be activated weekly to flush lines and ensure proper working condition.

The spill control equipment will be decontaminated after each use to remove any soil, debris, or chemical contamination with an aqueous cleanser or organic solvent. The equipment will be inspected prior to being returned for use. Contaminated shovels and brooms may also be disposed of with the waste.

Spill control equipment will be available to absorb both flammable and nonflammable wastes. Plant personnel will act as first responders only. Spill supplies should be checked monthly for completeness.

G-6 COORDINATION AGREEMENTS

Emergency response organizations were contacted and arrangements made to familiarize them with the properties of the materials handled at the facility and the types of injuries, illnesses, and emergencies which could result from fires, explosions or releases. An example of the letter sent to each agency/organization is attached. The following emergency response organizations were sent the sample letter shown on page 81 on November 10, 1992. Similar letters were sent on June 5, 1991, August 6, 1991, September 24, 1991, March 10, 1992, November 10, 1992, August 1, 2000, and March 14, 2005, April 25, 2007, November 29, 2012 and were updated through time with the November 29, 2012 letter being the most recent.

Distribution List

Northwest Medical Center
1530 U.S. Highway 43
Winfield, AL 35594
(205) 487-7000

Primary Fire Department
Sulligent, Fire Department
114 E. Main Street
Sulligent, AL 35586
Dial 911

P.O. Box 578
Sulligent, AL 35586

Secondary Fire Department
Vernon Fire Department
1100 1st Avenue NW
Vernon, AL 35592
(205) 695-7718

P.O. Box 1301
Vernon, AL 35592

Sheriffs Department
704 Yellow Creek Road
Vernon, AL 35592
(205) 695-7103

P.O. Box 770
Vernon, AL 35592

Distribution List - **Continued**

Lamar Regional Health Center
478 Elm Street
Sulligent, AL 35586

Primary Rescue Squad
North Lamar Rescue Squad
P.O. Box 554
Sulligent, AL 35586
Dial 911

Secondary Rescue Squad
Vernon Rescue Squad
P.O. Box 357
Vernon, AL 35592
(205) 695-9200 or Dial 911

Lamar County Emergency Management Agency
(205) 695-7105

State Highway Patrol Haz Mat Team
Montgomery, AL
(205) 242-4395

Emergency Contact
(OH Material)
Finley, OH
1-800-537-5660
1-800-537-9540

EXAMPLE LETTER OF INVITATION AND NOTIFICATION

November 29, 2012

Business Manager
Lamar Regional Health Care
478 Elm Street
Sulligent, AL 35586

Dear Sir or Madam:

Enclosed please find the amended Contingency Plan of EQ Alabama, Inc. Formerly Terra Storage Facility, Inc. This amendment is to change the name of the facility due to the sale of the facility to The Environmental Quality Company and to remove the alternate Emergency Coordinator Scott Westbrook and add Andrew Wilson. As a storage facility of hazardous waste, this plan is required by law. We invite you to visit our facility and examine those items which might impact on your agency in case of an emergency.

If your agency chooses not to participate in the event of an emergency, please notify EQ Alabama, Inc. of your intentions by letter. Should you have questions or need additional information, please do not hesitate to contact me. Thank you for your time and attention:

Sincerely,

Shanda Murff
Emergency Coordinator

Enclosed

See Distribution List

Other agencies and hotlines are available for use without prior contact. Some of these agencies must be called in the event of a release; others provide technical assistance for other types of specialized support.

National Response Center
Washington, D.C.
1-800-424-8802

ADEM Environmental Emergencies Management
Birmingham Office
(7:00 - 5:00 central time) (205)942-6168
24-hour central office 1-800-843-0699

National Pesticide Telecommunications
Network 1 -800-858-7378

G-7 Evacuation Plan

In the event that an incident occurs that warrants evacuation of the plant, the actions listed below will be taken. The EC will determine that an incident warrants evacuation if the fire, explosion, or spill will have an adverse impact on facility personnel (e.g., toxic vapors, quickly spreading fire).

1. The EC or alternate will sound the alarm to signal an evacuation.

2. The EC will immediately notify appropriate local authorities and be available to help appropriate officials decide whether local areas should be evacuated.

3. The EC will also immediately notify the Alabama Emergency Management Agency at 1-800-843-0699 and/or National Response Center at 1-800-424-8802 with a report including:
   - (i) Name and telephone number
   - (ii) Name and address of facility
   - (iii) Time and type of incident
   - (iv) Types and quantity of materials involved
   - (v) Extent of injuries, if any
   - (vi) Possible hazards to human health, or the environment, outside the facility

4. Plant personnel will evacuate the plant, via the front gate, as a primary evacuation route. If personnel are downwind of the release or other incident, the back gate is used as an alternate evacuation route. The evacuation routes are shown in Figure 1.

5. The designated assembly area will be next to the facility sign on Alabama Highway 17. Alternate assembly area is on Lamar County Road 29 near the gate.

6. Ensure all persons are accounted for by conducting a head count in the assembly area.

G-8 REQUIRED REPORT

After implementation of the Contingency Plan, the Facility Manager will notify the Alabama Department of Environmental Management (ADEM) and appropriate local authorities that the facility is in compliance with the waste storage and emergency equipment maintenance requirements. The Facility Manager will note in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan. Within 15 days after an incident requiring enactment of the Contingency Plan, a written report will be submitted on the incident to ADEM. The report will include:

a. name, address, and telephone number of the Facility Manager

b. name, address, and telephone number of the facility

c. date, time and type of incident (e.g. fire, explosion)

d. name and quantity of material(s) involved

e. the extent of injuries, if any

f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and

g. estimated quantity and disposition of recovered material that resulted from the incident.

Amendments to the Contingency Plan

This plan will be amended if any of the following occurs:

1. the applicable regulations are revised;
2. this plan fails in an emergency;
3. the list of Emergency Coordinators changes;
4. the list of emergency equipment changes; and
5. 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 constituents, or changes the response necessary in an emergency.

Amendments to this Contingency Plan will be sent to the agencies listed in this plan.

REVISION HISTORY

1. Original plan prepared by ETE, Inc. Of Lexington, SC, May 21, 1991.
2. Revised September 24, 1991, by ETE, Inc.
3. Revised March 10, 1992, by ETE, Inc.
4. Amended by Pamela S. Skaar, the Evergreen Group, Inc. September, 1992, to accompany Part B application and incorporate training.

Part B Issued February 1, 1995.

1. March 3, 1995
2. March 17, 1997
3. March 25, 1997
4. August 1, 2000
5. July 28,2004
6. September 29,2004
7. December 8, 2004
8. April 7, 2005
9. April 25, 2007
10. May 21, 2007
11. November 29, 2012
12. May 1, 2015

ATTACHMENTS

G

EQ Alabama, Inc.
51328 AL Highway 17
Sulligent, AL 35586

USE SULLIGENT (EQ ALABAMA, INC.)
EMERGENCY CONTACT PERSONNEL / RESPONSE AGENCIES AND ORGANIZATIONS
***Dial 9 to get an outside line from any office phone**

EMERGENCY COORDINATOR:
Shanda Murff
205-698-8915 (office)
205-712-9324 (cell)
205-698-0195 (home)

ALTERNATE EMERGENCY COORDINATORS:
Tim Phelps
205-698-8915 (office)
205-712-0000 (cell)
205-712-0000 (home)

ALTERNATE EMERGENCY COORDINATORS:
Andy Wilson
205-698-8915 (office)
662-305-7270 (cell)
662-305-7270 (home)

CORPORATE COMMUNICATIONS MANAGER:
Dave Crumrine
734-521-8032 (office)
734-845-8410 (cell)

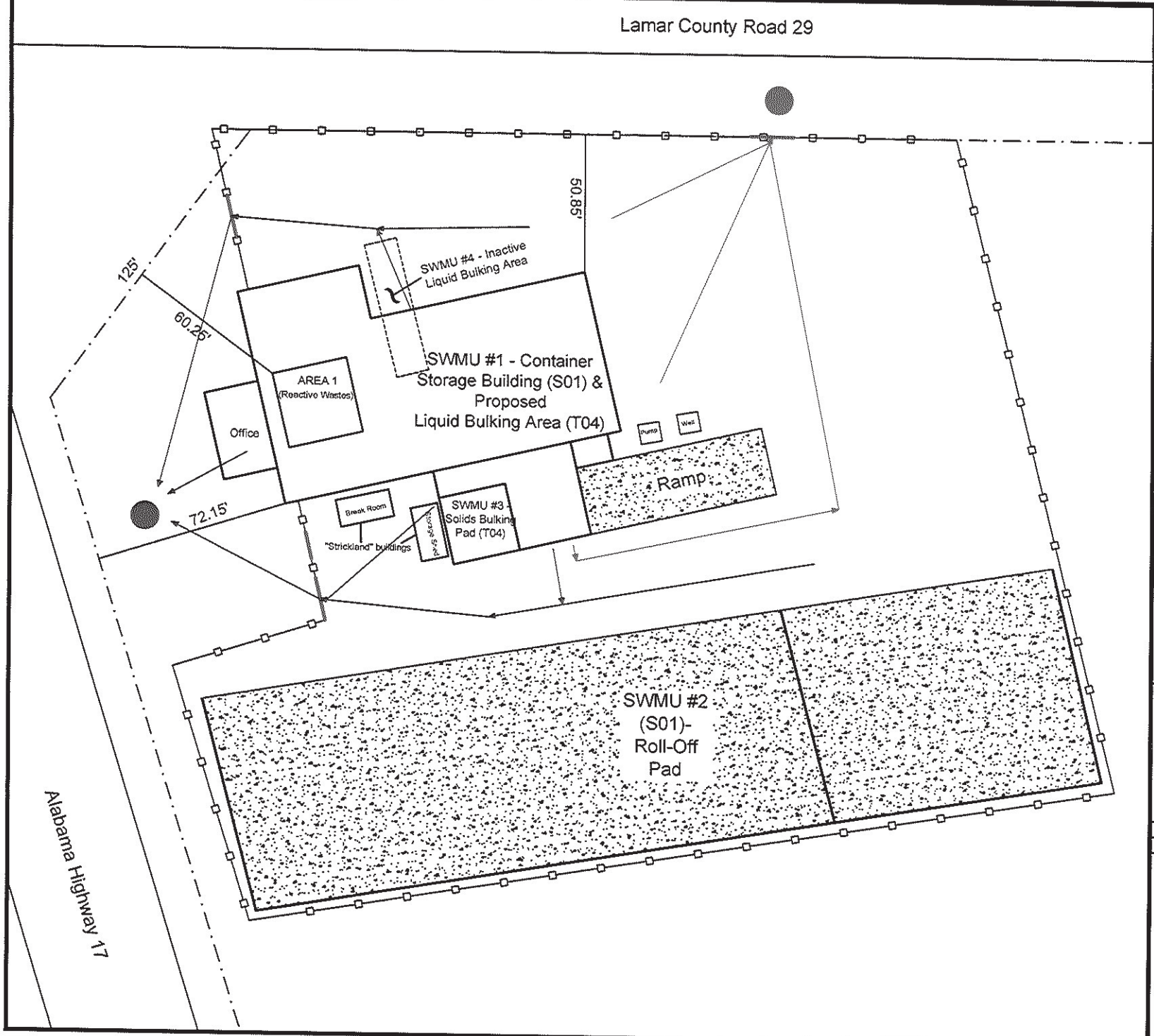
ELECTRIC, GAS, & WATER UTILITIES:
Tombigbee Electric Cooperative: **205-468-3325**

FIRE, POLICE, SHERIFF:
1st Fire Department - City of Sulligent: **911**
2nd Fire Department - City of Vernon: **205-695-7434**
Sheriff Dept - Lamar County: **911 or 205-695-7103**
State Highway Patrol Haz-Mat Team : **205-242-4395**

EMERGENCY MEDICAL SERVICES:
1st North Lamar Rescue Squad: **911**
2nd Vernon Rescue Squad: **911 or 205-695-9200**
Northwest Medical Center: **205-487-7000**
Lamar Regional Health Center: **205-698-7111**

GOVERNMENTAL AGENCIES:
National Response Center (RQ): **800-424-8802**
Alabama Emergency Management: **800-843-0699 24-hr**
Alabama Dept. of Environmental Management ADEM: **334-271-7700**
Alabama Dept. of Public Safety: **334-322-4691**
US Environmental Protection Agency Region IV: **404-347-3061**
Local Emergency Planning Committee: **205-932-5966**
National Pesticide Telecommunications Network: **800-858-7378**
Poison Control Center: **800-222-1222**

OTHER SUPPORT SOURCES
USE National Emergency Response: **800-839-3975**



1" = 50'

Legend

- Primary Evacuation Route
- Primary Evacuation Assembly Area
- Secondary Evacuation Route
- Secondary Evacuation Assembly Area
- Property Line
- Fence
- Gate
- Concrete

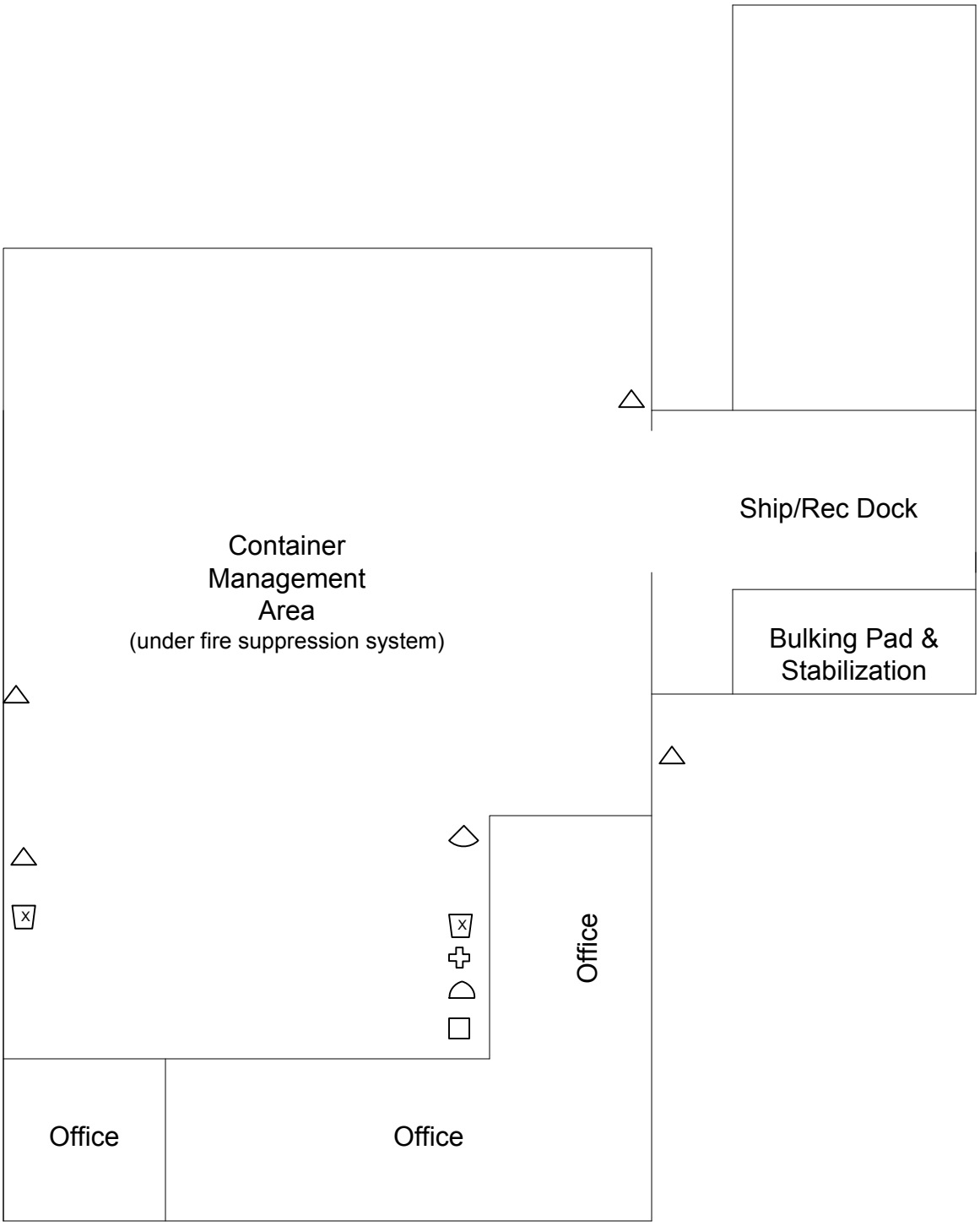
TTL
Technology and Tradition
3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401
205.345.0816 ■ Fax 205.343.0619

TTL PROJECT NO: 060103-071

PROJECT DATE: April 7, 2005

Figure 1 - Contingency Plan

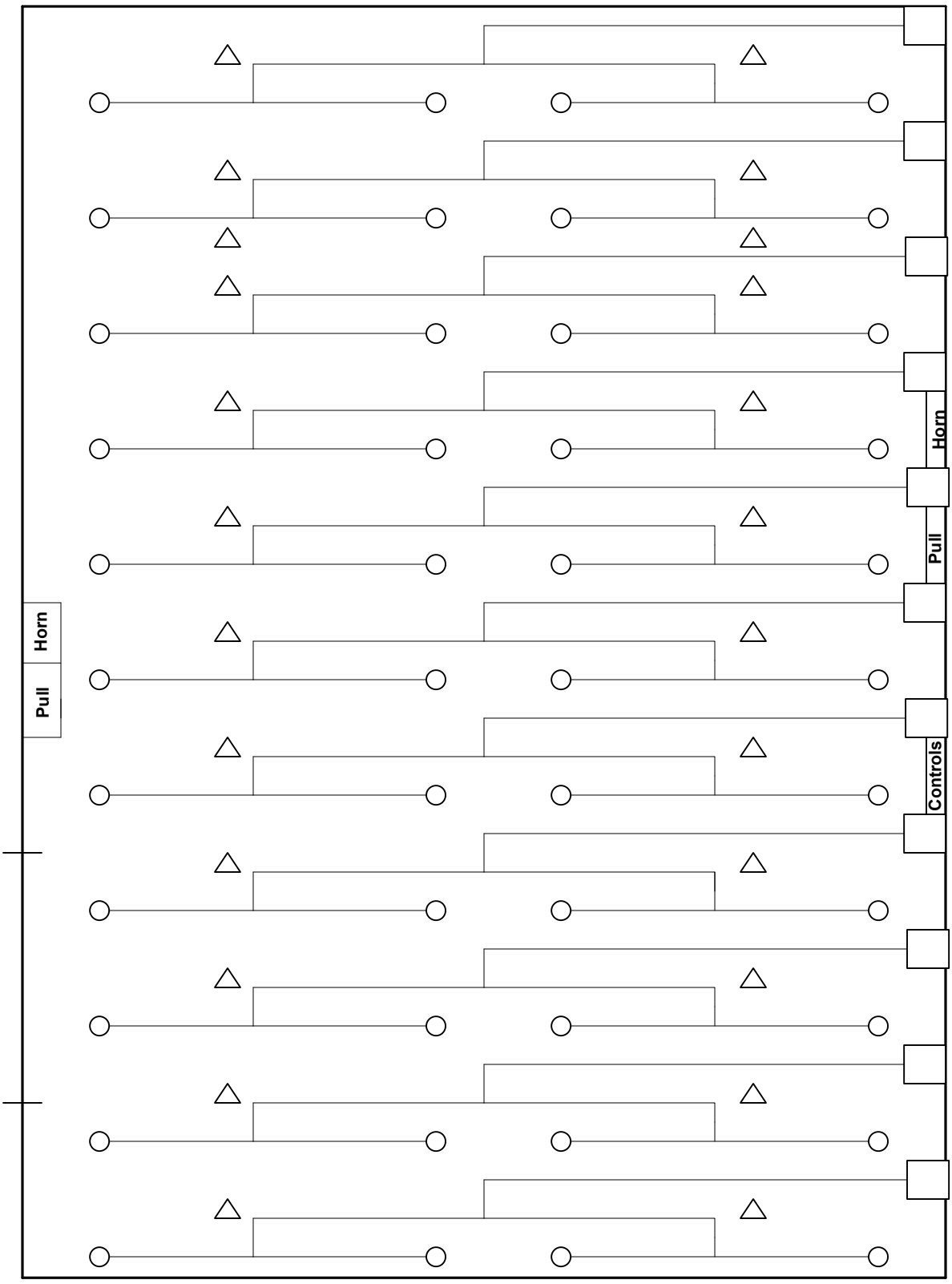
Evacuation Routes
Terra First Inc.
Alabama Storage Operations
Vernon, Alabama



Emergency Eyewash & Shower
Fire Extinguisher
First Aid Kit
Spill Control Supplies
Decontamination Equipment
PPE Supplies

Figure 2
Revised 10/16/15

EQ Alabama, Inc.
51328 Highway 17
Sulligent, AL 35586



□ 100 lb ABC Dry Chem Cylinder & Valve Assy

○ Spray Nozzle

△ 140º Heat Detectors

Ansul Industrial Pre-Engineered Automatic and/or Manual ABC Dry Chemical Fire Suppression System – With 11 @ 100 lb Dry Chem Tanks, 44 Total Flood Nozzles, 24 @ 140° Heat Detectors controlled by an Ansul Auto-Pulse 442R Releasing Panel. Includes Remote Manual Pull Station, Strobe-Horn, and Exhaust Fan Shutdown.

Figure 3
Revised 10/16/15

EQ Alabama, Inc.
51328 Highway 17
Sulligent, AL 35586

Based on 3/31/95 FireMaster Drawing

THE ENVIRONMENTAL QUALITY COMPANY

EQ ALABAMA • P.O. Box 1259 • VERNON, ALABAMA 35592 • *tel* 800-695-8915 • *fax* 205-698-8923

November 29, 2012

Business Manager
Sulligent Fire Department
114 E. Main Street
Sulligent, AL 35586

Dear Sir or Madam:

Enclosed please find the amended Contingency Plan of EQ Alabama, Inc. Formerly Terra Storage Facility, Inc. This amendment is to change the name of the facility due to the sale of the facility to The Environmental Quality Company and to remove the alternate Emergency Coordinator Scott Westbrook and add Andrew Wilson. As a storage facility of hazardous waste, this plan is required by law. We invite you to visit our facility and examine those items which might impact on your agency in case of an emergency.

If your agency chooses not to participate in the event of an emergency, please notify EQ Alabama, Inc. Of your intentions by letter. Should you have questions or need additional information, please do not hesitate to contact me. Thank you for your time and attention:

Sincerely,

Shanda Murff
Emergency Coordinator

Enclosed

THE ENVIRONMENTAL QUALITY COMPANY

EQ ALABAMA • P.O. Box 1259 • VERNON, ALABAMA 35592 • *tel* 800-695-8915 • *fax* 205-698-8923

November 29, 2012

Business Manager
Vernon Fire Department
1100 1st Avenue NW
Vernon, AL 35592

Dear Sir or Madam:

Enclosed please find the amended Contingency Plan of EQ Alabama, Inc. Formerly Terra Storage Facility, Inc. This amendment is to change the name of the facility due to the sale of the facility to The Environmental Quality Company and to remove the alternate Emergency Coordinator Scott Westbrook and add Andrew Wilson. As a storage facility of hazardous waste, this plan is required by law. We invite you to visit our facility and examine those items which might impact on your agency in case of an emergency.

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Sincerely,

Shanda Murff

Shanda Murff
Emergency Coordinator

Enclosed

THE ENVIRONMENTAL QUALITY COMPANY

EQ ALABAMA • P.O. Box 1259 • VERNON, ALABAMA 35592 • *tel* 800-695-8915 • *fax* 205-698-8923

November 29, 2012

Business Manager
Lamar County Sheriffs Department
704 Yellow Creek Road
Vernon, AL 35592

Dear Sir or Madam:

Enclosed please find the amended Contingency Plan of EQ Alabama, Inc. Formerly Terra Storage Facility, Inc. This amendment is to change the name of the facility due to the sale of the facility to The Environmental Quality Company and to remove the alternate Emergency Coordinator Scott Westbrook and add Andrew Wilson. As a storage facility of hazardous waste, this plan is required by law. We invite you to visit our facility and examine those items which might impact on your agency in case of an emergency.

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THE ENVIRONMENTAL QUALITY COMPANY

EQ ALABAMA • P.O. Box 1259 • VERNON, ALABAMA 35592 • *tel* 800-695-8915 • *fax* 205-698-8923

November 29, 2012

Business Manager
North Lamar Rescue Squad
114 B Main Street
Sulligent, AL 35586

Dear Sir or Madam:

Enclosed please find the amended Contingency Plan of EQ Alabama, Inc. Formerly Terra Storage Facility, Inc. This amendment is to change the name of the facility due to the sale of the facility to The Environmental Quality Company and to remove the alternate Emergency Coordinator Scott Westbrook and add Andrew Wilson. As a storage facility of hazardous waste, this plan is required by law. We invite you to visit our facility and examine those items which might impact on your agency in case of an emergency.

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Sincerely,

Shanda Murff
Emergency Coordinator

Enclosed

THE ENVIRONMENTAL QUALITY COMPANY

EQ ALABAMA • P.O. Box 1259 • VERNON, ALABAMA 35592 • *tel* 800-695-8915 • *fax* 205-698-8923

November 29, 2012

Business Manager
Vernon Rescue Squad
109 First Avenue
Vernon, AL 35592

Dear Sir or Madam:

Enclosed please find the amended Contingency Plan of EQ Alabama, Inc. Formerly Terra Storage Facility, Inc. This amendment is to change the name of the facility due to the sale of the facility to The Environmental Quality Company and to remove the alternate Emergency Coordinator Scott Westbrook and add Andrew Wilson. As a storage facility of hazardous waste, this plan is required by law. We invite you to visit our facility and examine those items which might impact on your agency in case of an emergency.

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Emergency Coordinator

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THE ENVIRONMENTAL QUALITY COMPANY

EQ ALABAMA • P.O. Box 1259 • VERNON, ALABAMA 35592 • *tel* 800-695-8915 • *fax* 205-698-8923

November 29, 2012

Business Manager
Lamar County Regional Health Center
478 Elm Street
Sulligent, AL 35586

Dear Sir or Madam:

Enclosed please find the amended Contingency Plan of EQ Alabama, Inc. Formerly Terra Storage Facility, Inc. This amendment is to change the name of the facility due to the sale of the facility to The Environmental Quality Company and to remove the alternate Emergency Coordinator Scott Westbrook and add Andrew Wilson. As a storage facility of hazardous waste, this plan is required by law. We invite you to visit our facility and examine those items which might impact on your agency in case of an emergency.

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Sincerely,

Shanda Murff
Emergency Coordinator

Enclosed

THE ENVIRONMENTAL QUALITY COMPANY

EQ ALABAMA • P.O. Box 1259 • VERNON, ALABAMA 35592 • *tel* 800-695-8915 • *fax* 205-698-8923

November 29, 2012

Business Manager
Northwest Medical Center
1530 U.S. Highway 43
Winfield, AL 35594

Dear Sir or Madam:

Enclosed please find the amended Contingency Plan of EQ Alabama, Inc. Formerly Terra Storage Facility, Inc. This amendment is to change the name of the facility due to the sale of the facility to The Environmental Quality Company and to remove the alternate Emergency Coordinator Scott Westbrook and add Andrew Wilson. As a storage facility of hazardous waste, this plan is required by law. We invite you to visit our facility and examine those items which might impact on your agency in case of an emergency.

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Sincerely,

Shanda Murff
Emergency Coordinator

Enclosed

SECTION H

PERSONNEL TRAINING

SECTION H - PERSONNEL TRAINING

H-1 OUTLINE OF TRAINING PROGRAM

General Description and Outline of Training

EQ Alabama, Inc. (EQAL) provides a layered approach for training all of its employees.

New employees are provided with introductory and awareness level training commensurate with their work activities during their first days of employment. Topics covered include RCRA, HAZWOPER, DOT, and other environmental/safety/health related topics. New employees are also provided with 24 hour HAZWOPER Classes prior to beginning any work involving Hazardous Wastes.

Monthly training modules are also provided by EHS staff and/or other management staff to all current employees. The monthly modules cover various environmental, health, and safety topics that have been determined to be applicable based on the actual work being performed at the EQAL facility. There are additional training classes provided by third party instructors for the ongoing maintenance of required training elements. These may include 8-Hr HAZWOPER Refresher, RCRA, DOT Hazardous Materials, and others.

These training elements specifically include instruction on hazardous waste management procedures for facility personnel designated as hazardous waste workers. Some of the areas covered within the training include:

(1) The location, use, inspection and maintenance of facility emergency equipment such as – fire extinguishers, spill control equipment and supplies, emergency eye wash and emergency showers;
(2) The location, use, inspection and repairing of facility monitoring equipment such as - air and noise;
(3) The operations and controls for automatic waste feed systems and processes, if applicable
(4) The various forms and types of communication systems available on site such as – land phones, cell phones, and two-way radios,
(5) Employee response to a fire or explosion – from using a fire extinguisher to calling the emergency response coordinator, to area evacuation;
(6) Associate response to potential ground water contamination – from notifying the Emergency response coordinator to diking and berming to stop the spread, to knowing where the spill control products are located and having a knowledge of how to utilize them to control the spread of contamination;
(7) Knowing the standard operating procedures necessary to shut down operations in their area if it pertains to their particular job function.

Introductory/New Employee Training

The initial training program will be covered and given as part of the NEW Employee or Job Transfer Safety Orientation. The Health and Safety orientation is completed on the first days the new or transfer employee is in the work area. The orientation includes the initial Contingency Plan and Emergency Response Procedures. The first portion of the EQ Safety Orientation Checklist (Attachments H) will be used to verify training by the Regulatory Manager, Operations Supervisor, or his/her designee in several areas. Item number 2 will be the site Initial RCRA Contingency Plan and Emergency Response Procedures.

The initial training program covers:

- Chemical Hazard Identification
- Working with Chemicals
- Regulatory Overview with the seven actions facility personnel must take to minimize hazards in response to a fire or explosion or any unplanned sudden or non-sudden release of hazardous waste.
- General Requirements for Ignitable, Reactive & Incompatible Waste
- Preparedness & Prevention
- Contingency Plan Requirements
- Contingency Plan Purpose and Implementation Procedures for Fires/Explosions and Spills/Releases
- The types, sizes, and locations of fire extinguishers and suppression systems on site.
- The various types of spill control equipment are identified; such as absorbents, shovels, brooms, recovery drums and squeegees. They are all described and their locations on site identified.
- The various means of communication available on the site are explained and identified: land phones, cell phones, and two-way radios.
- The decontamination procedures and equipment; Also included in decontamination are the locker room, the emergency eyewash stations, and emergency eyewash and shower locations.
- First aid kit locations are identified.
- The personal protective equipment available, capabilities and locations are reviewed.
- The Evacuation Plan (40 CFR 264.52 (f))- procedures, evacuation routes and the meeting (rally) point are detailed and the locations pointed out on the site map.
- A copy of the latest list of facility Emergency Response Coordinators, their work addresses their contact phone numbers.
- A copy of the latest list of the Emergency Contacts.

Continuing Training

The topics to be covered will be the same as those in the initial training and will include any revisions or updates.

H-1a Job Title and Duties

Job Titles and Job Descriptions

Job titles and job description with the training requirements for each hazardous waste worker position at the facility is maintained.

The job description includes outlining the purpose of the position, essential functions – critical duties/tasks, additional responsibilities and job qualifications.

A training record file with a copy of the job description and ongoing training records (sign-in sheets/certificates etc.) is maintained for all current employees.

H-1b FREQUENCY OF REQUIRED TRAINING

Initial Training

Training is initiated on the first days of employment with the new employee orientation. The training process continues until the employee has satisfied the requirements of the outline and as described above, this will be completed within the first six months of employment in a new position.

Continuing Education

All hazardous waste worker personnel are required to take part in an annual review of the initial training outline as described above.

H-1c Training Director

The EHS Manager, Operations Supervisor, or their designee will conduct the training program. The qualifications used to demonstrate the knowledge of hazardous waste management procedures can include: Academic credentials such as copies of certificates, training seminars, certifications, college degree, or train-the-trainer certification. Also, formal experience in the Hazardous Waste Industry or other relevant work history that relates directly to the subject matter may be used to establish competency.

H-1d Description of How Training is Designed to Meet Actual Job Tasks

After the initial training from the EHS Manager, Operations Supervisor, or their designee, the employee's immediate supervisor or coworker will conduct the job specific training for the actual job location and job tasks the employee will be assigned to perform. The training will consist of both verbal and hands-on training. The training will be completed during the first days the employee is in the work area.

The supervisor/coworker will explain:

(1) The location, use, inspection and repairing of facility emergency equipment such as – fire extinguishers, spill control equipment and supplies, emergency eye wash and emergency showers;
(2) The location, use, inspection and repairing of any facility monitoring equipment such as - air or noise;
(3) The operations and controls for automatic waste feed systems and processes;
(4) The various form and types of communication systems available on site such as – land phones, cell phones, and two-way radios;
(5) Employee response to a fire or explosion – from using a fire extinguisher to activating the alarm, to calling the emergency response coordinator, to area evacuation;
(6) Associate response to ground water contamination – from notifying the Emergency response coordinator to diking and berming to stop the spread, to knowing where the spill control products are located and having a knowledge of how to utilize them to control the spread of contamination; and finally
(7) Knowing the standard operating procedures necessary to shut down operations in their area if it pertains to their particular job function.

H-1e Training for Emergency Response

The contents of this section are included in Section H-1 and H-1d.

H-2 IMPLEMENTATION OF TRAINING PROGRAM

EQAL has established a system of methods, documents, and records to be used for the purpose of training new employees and maintaining recurrent training for existing employees. This system may include:

- New Employee/Transfer Employee Orientation Forms
- Training Modules that include Programs and Forms
- Training Sign-In Forms and/or Training Certificates
- Formal Arrangements with Third Party Training Services
- Spreadsheets or Calendars to Document and Alert Recurrence Need of Training
- Regular Review System of Spreadsheets and Calendars for Training

- Ongoing System of Auditing to Review Training Performance

Records and Documentation

EQAS will maintain the following documents and records at the facility in paper or electronic format:

- Job titles and written job description for each hazardous waste worker is maintained. The hazardous waste worker job descriptions are reviewed and/or updated by the EHS manager and Operations Supervisor. When new job title/job descriptions are created at the facility it is the responsibility of the immediate supervisor to create a job description including the job specific functions, qualifications, and training requirements. A copy of the written job description will be given to each person filling a job title listed during their initial training;
- A description of the type and amount of training required for each hazardous waste worker job title will be maintained in association with the job description. The EHS Manager will review the training requirements of each job description.

Records, including training certificates and sign-in sheets that document class attendance and/or competence, for each individual are maintained in the training record. All current employees are maintained in the active file system and will be maintained until facility closure. Past employee files are archived in accordance with applicable regulation and maintained at least 3 years from the last date of service.

SECTION I

CLOSURE PLANS AND FINANCIAL REQUIREMENTS

I-1 CLOSURE PLANS

The Solid Waste Management Units to be closed at this facility are:

- One Container Storage Building
- One Roll-off Pad
- One Bulking Pad for solids. Liquids are bulked in the container storage building.

I-la Closure Performance Standard

This closure plan will be implemented to ensure: (1) the need for further maintenance of hazardous waste management is minimized, and (2) that the post closure escape of hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to groundwater, surface water, or the atmosphere is controlled, minimized or eliminated to the extent necessary to protect human health and the environment.

This closure plan is written, such that the owner or operator will treat off-site any hazardous waste located at the site at the time of closure. However, the closure cost estimate is based on the off-site treatment and disposal by a third party, of any hazardous waste located at the facility at the time of closure.

I-Ib Partial Closure and Final Closure Activities

If at any time during the operation of the facility partial closure is needed, the unit will be closed according to the closure plan.

1.1c Maximum Waste Inventory

The maximum inventory of hazardous waste, on the last day that the waste is received, is estimated to be 104,250 gallons in the container storage building, and 392,700 gallons on the roll off pad. This is the amount of waste expected to be on the site on the day before closure begins. This represents 100% of the facility capacity and is the maximum amount of waste that might possibly require disposal at closure. This maximum inventory of hazardous waste is reflected in the closure cost estimate: (See Attachment I of this section).

I-1d Schedule for Closure

The estimated year of closure is 2037. This facility closure will be complete within 180 days from the start of closure. The schedule of closure events and time necessary for completion of these events is as follows:

Closure Event	Days from Closure Initiation
Removal of Waste Inventory	90 Days
Decontamination of Structures and Equipment	120 Days
Collection and Analysis of Samples and Disposal of Decontamination Residues	150 Days
Preparation of Professional Engineer Certification and Closure Report	170 Days
Submission of Report to Agency for Approval: Closure Complete	180 Days

Notification of Closure

The owner or operator will notify the Regional Administrator of commencement of closure activities at least 45 days prior to that date. The date on which closure activities will commence will be no later than thirty (30) days after the final volume of hazardous waste are received.

1-1d(1) Time Allowed for Closure

All hazardous wastes shall be removed from the site within ninety (90) days after receiving the final volume of hazardous waste, as indicated previously. In the event that an unexpected contingency occurs whereby this deadline cannot be met, the owner or operator will submit a written request to the Regional Administrator requesting an extension of at least (30) days prior to the end of the (90) day period.

Certification of Closure

Within sixty (60) days of completion of closure, the owner or operator will submit to the EPA and/or ADEM, by registered mail, a certification that the facility has been closed in accordance with the approved plan. The certification will be signed by the owners authorized representative and an independent registered professional engineer who will supply documentation supporting the certification. The professional engineer who certifies the closure should be present through the closure process and have first hand knowledge that the facility is properly closed according to the closure plan.

1-Ie Closure Procedures

1-1e(1) Inventory Removal, Disposal or Decontamination of Equipment

All reusable tools used in the closure of the site will be steam cleaned in a plastic lined, diked area inside the Container Storage Building. The condensate will then be collected, using portable pumps and hoses, and will be stored in a suitable container, then transported off-site for treatment and disposal at an appropriate hazardous waste facility. All material handling equipment and the earth moving equipment utilized to remove any contamination on the site will be decontaminated in a plastic lined, diked area inside the Container Storage Building and using a high pressure washer. The wash water will be collected in an appropriate container and transported off-site for disposal as an approved hazardous waste facility.

I-Ie(2) Closure of Disposal Units

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

1-1e(3) Closure of Containers

The Solid Waste Management Units to be closed at this facility all relate to the storage of containers and are:

- One Container Storage Building with a capacity of 104,250 gallons.

- One Roll-off Pad with a capacity of 392,700 gallons.

- One Bulking Pad with a capacity of 35 cubic yards.

1-10(3)(a) Container Storage Building

Upon closure of the Container Storage Building, all bulk solid waste will be disposed of at an appropriate permitted facility. The first step in the closure procedure is the removal of any solid material including sand, industrial absorbent, and accumulated residue located within the concrete storage areas. All accumulated materials will be manually removed using appropriate tools and properly disposed of at an approved hazardous waste disposal or treatment facility.

Once the concrete has been inspected, it will be cleaned using a double wash/rinse procedure. The concrete area will be washed using a pressure washer with industrial strength detergent wash. The rinse water will be collected using portable pumps and stored in a suitable container for analysis and off-site treatment or disposal. Wipe samples will be collected after the second rinsing for analysis and will be compared to background concentrations, to determine if the area is clean. One wipe sample will be taken in each of the five storage areas within the container storage building (See Figure 3 in the Figures section of this application), while the background sample will be taken within the office area. The parameters for which samples will be analyzed are listed in ADEM Administrate Code 335-14-5-Appendix IX. All analyses will be conducted by a qualified independent laboratory. A trip blank will be included in the sampling and analysis.

If the concentration of any constituent in the wipe samples exceeds the background concentration, the area will require further decontamination. If concentrations continue to exceed the background concentrations after additional decontamination, additional sampling will be proposed to include either concrete chip or concrete core sampling.

I-1e(3)(b) Roll-off Pad

Upon closure of the Roll-off Pad, all bulk solid wastes will be disposed of at an appropriate permitted facility. The first step in the closure procedure is the removal of any solid material including sand, industrial absorbent and accumulated residue located within the concrete storage areas. All accumulated materials will be manually removed using appropriate tools and properly disposed of at an approved hazardous waste disposal or treatment facility.

Once the concrete has been inspected, it will be cleaned using a double wash/rinse procedure. The concrete area will be washed using a pressure washer with industrial strength detergent wash. The rinse water will be collected using portable pumps and stored in a suitable container for analysis and off-site treatment or disposal. Wipe samples will be collected after the second rinsing for analysis and will be compared to background concentrations, to determine if the area is clean. One wipe sample will be taken near each of the three storm water outfalls on the south side of the ROP and three wipe samples will be taken within the 2 ft. swale that runs along the north side of the ROP (See Figure 4 in the Figures section of this application), while the background sample will be taken within the office area. The parameters for which samples will be analyzed are listed in ADEM Administrate Code 335-14-5-Appendix IX. All analyses will be conducted by a qualified independent laboratory. A trip blank will be included in the sampling and analysis.

If the concentration of any constituent in the wipe samples exceeds the background concentration, the area will require further decontamination. If concentrations continue to exceed the background concentrations after additional decontamination, additional sampling will be proposed to include either concrete chip or concrete core sampling.

1-1e(3)(c) Bulking Pad

Upon closure of the Bulking Pad and Loading Dock area, all bulk solid waste will be disposed of at an appropriate permitted facility.

The first step in the closure procedure is the removal of any solid material including sand, industrial absorbent and accumulated residue located within the concrete storage areas. All accumulated materials will be manually removed using appropriate tools and properly disposed of at an approved hazardous waste disposal or treatment facility.

Once the concrete has been inspected, it will be cleaned using a double wash/rinse procedure. The concrete bulking pad and the loading dock area will be washed using a pressure washer with industrial strength detergent wash. The rinse water will be collected using portable pumps and stored in a suitable container for analysis and off-site treatment or disposal. Wipe samples will be collected after the second rinsing for analysis and will be compared to background concentrations, to determine if the area is clean. One wipe sample will be taken in the solids bulking area, and one will be taken on the loading dock area, while the background sample will be taken within the office area. The parameters for which samples will be analyzed are listed in ADEM Administrate Code 335-14-5-Appendix IX. All analyses will be conducted by a qualified independent laboratory. A trip blank will be included in the sampling and analysis.

If the concentration of any constituent in the wipe samples exceeds the background concentration, the area will require further decontamination. If concentrations continue to exceed the background concentrations after additional decontamination, additional sampling will be proposed to include either concrete chip or concrete core sampling.

I-1 e(4) Closure of Tanks

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

I-Ie(5) Closure of Waste Piles

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

I-Ie(6) Closure of Surface Impoundments

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

I-Ie(7) Closure of Incinerators

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

1-1e(8) Closure of Landfills

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

I-Ie(9) Closure of Land Treatment

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

1-1e(10) Closure of Miscellaneous Units

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

1-2 Post Closure Plan

If "clean" closure cannot be achieved, EQAL will submit a permit modification for post closure care upon request by ADEM.

1-3 Notices Required for Disposal

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

1-4 Closure Cost Estimate

The estimated cost of closing the facility by a third party at the time of closure is $1,410,438. This cost is based on 100% of the capacity of this facility thereby meeting the requirement that the closure cost estimate be based on maximum inventory ever on-site. The complete closure cost estimate is provided in Attachment I of this section.

The amount of liquids required for decontamination of each process area has been estimated using the square footage of the secondary containment areas. Two 1/16thinch deep layers of detergent wash and two similar volumes of clean water are required. The supply cost of the water has been assumed to be negligible. Since all storage areas are located on concrete bases, no soil contamination is expected at this facility.

The owner or operator will adjust the closure cost estimate for inflation within 30 days after each anniversary of the date the first closure estimate was prepared or within 60 days prior to the anniversary date of the establishment of the financial instrument used to comply with ADEM Admin. Code Rule 335-14-5-.08, whichever is later.

During the active life of the facility, the owner or operator will revise the closure cost estimate within 30 days after the EPA and/or ADEM approves a request to modify the closure plan, if the change in the closure plan increases the cost of closure. The revised closure cost will be adjusted for inflation, as specified in ADEM Administrative Code Rule 33514-5-.08. The latest closure estimate will be kept at the facility during the operating life of the facility.

1-5 FINANCIAL ASSURANCE MECHANISM FOR CLOSURE

The financial assurance mechanism for closure of the EQ Alabama facility is in the form of a Performance Bond. A copy of the Financial Assurance documentation is included in Attachment I of this section.

1-6 POST-CLOSURE ESTIMATE

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

1-7 FINANCIAL ASSURANCE MECHANISM FOR POST-CLOSURE

Since the EQAL operation is a containerized storage facility ONLY, this section is not applicable.

ATTACHMENT
I
CLOSURE COST
ESTIMATE

CLOSURE COST ESTIMATE

EQ ALABAMA, INC.
EPA ID NO. ALD 983 177 015

This closure cost estimate is intended to meet the requirements of ADEM Administrative Code 335-14-5-.08(3). The closure cost has been estimated based on the maximum storage capacity for the Solid Waste Management Units that are currently constructed at the site.

CONTAINER STORAGE AREAS – BASIS FOR ESTIMATE CALCULATIONS

Container Storage Building

Form CS-2

1A Volume of Waste:

1168 Drums or 98,250 gallons of waste: (the volume capacity is larger than the drum capacity because as the size of the container increases, less space is lost, and storage capacity increases. See page 24 of this application and Figure 3)

98,250 gals + 6,000 gal vac truck = **104,250 gals**

2.0 Surface Area of CSB is based on Auto Cad Calculation of Area (See Figure 3)

4.A Inside Perimeter of Berm

Length of Berms along North and South Walls = 120 feet
Length of Berms along East and West Walls = 60 feet
Length of Berm on North side of Area 1 = 25 feet

(120 feet x 2) + (60 feet x 2) + (25 x 2) = **410 feet**

6.A Surface Area of Loading Dock (See Figure 5):
(10 feet x 60 feet) + (20 feet x 25 feet) = 1,100 ft^2

Surface area of Solids Bulking Pad (See Figure 5):
20 feet x 25 feet = 500 ft^2

Surface Area of Curb along the west side of BP:
25 feet x **1.25** feet = 31.25 ft^2

Surface Area of Wall along the north and east sides of BR
(20 feet x 2 feet) + (25 feet x 2 feet) = 90 ft^2

Total surface area of loading dock/bulking pad:
1,100 ft^2 + 500 ft^2 + 31.25 ft + 90 ft^2 = 1,721.25 ft^2 = **1,722 ft^2**

Roll-off Pad

Form CS-3

1A Volume of Waste

100 Roll-Offs x 3927 gallons/roll-off = **392,700** gal 3927 gal = approximately 19.5 yd^3/roll-off

4.A inside Perimeter of Berm (See Figure 4)

315 foot + (80 feet x 2) + (70 feet x 2) = **615 feet**

DECONTAMINATION

Container Storage Building

Form DC-2

1. Area of Unit to be decontaminated:

Surface Area of CSB from Form CS-1 #2 = 5,730 ft^2
Surface Area of Berm from Form CS-1 #4 = 205 ft^2
Surface Area of Loading Dock/Bulking Pad from Form CS-1 #6 = 1,722 ft^2

5,730 ft^2 + 205 ft^2 + 1,722 ft^2 = **7,657 ft^2**

2 & 3. The labor and equipment costs were obtained from the 2004 RS Means Environmental Remediation Cost Data — Unit Price Guide Item # 33 17 0813 (Decontamination of a surface by Pressure Washing). The costs were adjusted with a localization factor and a productivity factor for Level D PPE as shown below:

Unadjusted Labor Cost/ft^2 = \$0.55/ft^2
Unadjusted Equipment Cost/ft^2 = \$0.38/ft^2
Hourly Output = 105 ft^2/hr = **0.0095 hr/ft^2**
Labor Productivity Factor (Level D Protection) = 82%
Equipment Productivity Factor (Level D Protection) = 100%
Local Factor for Zip Code 35586 = 0.77
Adjusted Labor Cost/ft^2 = \$0.55/.82 = \$0.67/ft^2
Adjusted Equipment Cost/ft^2 = \$0.38/1.00 = \$0.38/ ft^2
Total Equipment and Labor Cost = 0.67 + 0.38 = \$1.05/ ft^2
Total Cost Adjusted to Location = \$1.05 x 0.77 = \$0.8085/ ft^2
Total Cost/hr = 105 ft^2/hr x \$0.8085 / ft^2= \$84.89/hr

Roll-Off Pad

Form DC-3

1. Area of Unit to be decontaminated:

Surface Area of ROP from Form CS-1 #2 = 24,925 ft^2
Surface Area of Berm from Form CS-1 #4 = 307.5 ft^2
Surface Area of 2 foot Swale from Form CS-1 #6 = 630 ft^2

24,925 ft^2 + 307.5 ft^2 + 630 ft^2 = **25,863 ft^2**

2 & 3. See above for Calculations of cost per hour and hourly output.

SAMPLING AND ANALYSIS

Form SA-2

3. Number of Wipe Samples

# of Samples in CSB = 5 (1 in each area)
# of Samples in Bulking Pad Area = 2 (1 on BP and 1 on Loading Dock) # of Samples on ROP = 6 (1 at each of 3 drains and 3 in the 2 foot swale) # of Background samples = 1 (in office area)

Total = 5 + 2 + 6 + 1 = 14 wipe samples + 1 trip blank

4. Number of Aqueous Samples

1 sample of decontamination fluid from ROP, 1 sample of decontamination fluid from CSB, and sample of decontamination fluid from BP = 3 aqueous samples

Analysis Costs were based on current rates from TTL, Inc. Laboratory.

TRANSPORTATION and TREATMENT AND DISPOSAL

Form TR-2 (and TD-2/TD-3)

1a To Emelle, AL

Projected Non-Hazardous Solid Waste Drums = 1168 x 15% = 175 Projected Liquid Hazardous Waste Drums = 1168 x 15% = 175 Projected Hazardous Waste for Stabilization = 1168 x 60% = 701 Projected Drums of Decontamination Fluid = 96

175 + 175 + 701 + 96 = 1,147 drums to Emelle

Form TR-3 (and TD-3)

1a To Port Arthur, TX

Projected Hazardous Waste for Incineration = 1168 x 10% = 117

Treatment and disposal costs were calculated based on total drum capacity because cost of treatment and disposal of four drums is more than for one tote; therefore, the total cost is highest by assuming all drums even though the total volume of waste would be less.

All Transportation and Treatment and Disposal Costs were based on current rates provided by EQ Alabama, Inc.

CALCULATION WORKSHEETS

CLOSURE COST ESTIMATE

CONTAINER STORAGE AREAS

CONTAINER STORAGE AREAS CS-1

Facility Name: EQ Alabama, Inc. Estimate Summary Worksheet

CLOSURE COST ESTIMATE SUMMARY			
	ACTIVITY	**WORKSHEET REFERENCE**	**COST**
1	Decontamination	DC-1	$32,513
2	Sampling and Analysis	SA-1	$54,450
3	Transportation	TR-1	$61,446
4	Treatment and Disposal	TD-1	$729,153
Subtotal of Closure Cost (lines 1-4)			$877,562
5	Engineering Expenses (typically 10% of closure cost less certification of closure)		$87,757
6	Certification of Closure	CS-4	$8,475
Subtotal (Add engineering expenses and cost of certification)			$973,794
7	Contingency Allowance (typically 20% of closure cost, engineering expense, and cost of closure certification)		$194,759
TOTAL COST OF CLOSURE ESTIMATE (LINES 1-7)			**$1,168,553**

CONTAINER STORAGE – AREA CALCULATION CS-2

Facility Name: EQ Alabama, Inc. Assessment of Areas

Container Storage Building (CSB)

1 Maximum Permitted Capacity				
1a	Maximum Volume of Waste Permitted			104,250 gal
2 Surface Area of Secondary Containment System Pad				
2a	Length (excluding any curbs or berms)	**NA**	ft	
2b	Width (excluding any curbs or berms)	**NA**	ft	
2c	Surface Area of Containment System Pad			5,730 ft^2
2d	Surface Area of Containment System Pad (in yd^2)			637 yd^2
3 Volume of Secondary Containment System Pad - **NA**				
3a	Thickness		yd	
3b	Volume of Containment System Pad			
4 Surface Area of Secondary Containment System Berm				
4a	Inside Perimeter (2a + 2b x 2)	410 ft		
4b	Height	0.5 ft		
4c	Surface Area of Containment System Berm (4a x 4b)			205 ft^2
4d	Surface Area of Containment System Berm in yd^2			22.8 yd^2
5 Volume of Secondary Containment System Berm – **NA**				
5a	Thickness		yd	
5b	Volume of Containment System Berm (4d x 5a)			yd^3
6 Surface Area of Other Structures				
6a	Surface Area of Other Structures – Loading Dock & Solids Bulking Pad			1,722 ft^2
6b	Surface Area of Other Structures in yd^2			192 yd^2
7 Volume of Other Structures – **NA**				
7a	Volume of Other Structures			yd^3
8 Volume of Contaminated Soil To Be Removed – **NA**				
8a	Length		ft	
8b	Width		ft	
8c	Depth		ft	
8d	Volume of Contaminated Soil To Be Removed (8a x 8b x 8c)			ft^3
8e	Volume of Contaminated Soil To Be Removed in yd^3			yd^3

CONTAINER STORAGE – AREA CALCULATION CS-3

Facility Name: EQ Alabama, Inc. Assessment of Areas

Roll-Off Pad (ROP)

1 Maximum Permitted Capacity			
1a	Maximum Volume of Waste Permitted		392,700 gal
2 Surface Area of Secondary Containment System Pad			
2a	Length (excluding any curbs or berms)	313.5 ft	
2b	Width (excluding any curbs or berms)	79.5 ft	
2c	Surface Area of Containment System Pad		24,925 ft^2
2d	Surface Area of Containment System Pad (in yd^2)		2,770 yd^2
3 Volume of Secondary Containment System Pad - **NA**			
3a	Thickness	yd	
3b	Volume of Containment System Pad		yd^3
4 Surface Area of Secondary Containment System Berm			
4a	Inside Perimeter (2a + 2b x 2)	615 ft	
4b	Height	0.5 ft	
4c	Surface Area of Containment System Berm (4a x 4b)		307.5 ft^2
4d	Surface Area of Containment System Berm in yd^2		34.2 yd^2
5 Volume of Secondary Containment System Berm – **NA**			
5a	Thickness	yd	
5b	Volume of Containment System Berm (4d x 5a)		yd^3
6 Surface Area of Other Structures – 2 foot Swale			
6a	Surface Area of Other Structures – 2 foot Swale - 2’ x 315’		630 ft^2
6b	Surface Area of Other Structures in yd^2		70 yd^2
7 Volume of Other Structures – **NA**			
7a	Volume of Other Structures		yd^3
8 Volume of Contaminated Soil To Be Removed – **NA**			
8a	Length	ft	
8b	Width	ft	
8c	Depth	ft	
8d	Volume of Contaminated Soil To Be Removed (8a x 8b x 8c)		ft^3
8e	Volume of Contaminated Soil To Be Removed in yd^3		yd^3

CONTAINER STORAGE AREAS CS-4

Facility Name: EQ Alabama, Inc. Certificate of Closure

1	Number of Units Requiring Certificate of Closure	3	
2	Cost of Certificate of Closure per Unit	$2825	
Total Cost of Certification of Closure (1 x 2) - Enter on CS-1 - Line 6			**$8,475**

DECONTAMINATION DC-1

Facility Name: EQ Alabama, Inc.

DECONTAMINATION SUMMARY WORKSHEET			
	ACTIVITY	**WORKSHEET REFERENCE**	**COST**
1	Decontamination By Steam Cleaning/Pressure Washing of the Container Storage Building (including Loading Docks and Solids Bulking Pad) and the Roll-Off Pad	DC-2	$7,442
2	Decontamination By Steam Cleaning/Pressure Washing of the Roll-Off Pad	DC-3	25,071
TOTAL COST OF DECONTAMINATION - Enter on CS-1 – Line 1			**$32,513**

DECONTAMINATION DC-2

Facility Name: EQ Alabama, Inc. Decontamination by Stream Cleaning/Pressure Washing

Container Storage Building (CSB)

1	Total Area to be Decontaminated (CSB)	7,657 ft^2	
2	Labor and Equipment Cost/Work Hour	$84.89	
3	Work Rate to Steam Clean/Pressure Wash	0.0095 work hrs/ft^2	
4	Number of Hours Required to Complete Area	73 work hours	
5	**Subtotal of Labor and Equipment Cost**		$6,197
6	Volume of Decontamination Fluid	1,194 gal 7,657 ft^2 x 0.225 in x 1 ft/12 in x 7.48 gal/ft^3	
7	Number of Drums Requires to Contain Fluid for Removal (55-gallon drums)	22 drums	
8	Cost of One Drum	$56.60/drum	
9	Cost of Drums Needed to Contain Fluid		$1,245
TOTAL COST OF DECONTAMINATION BY STEAM CLEANING/PRESSURE WASHING (enter on DC-1)			**$7,442**

DECONTAMINATION DC-3

Facility Name: EQ Alabama, Inc. Decontamination by Stream Cleaning/Pressure Washing

Roll-Off Pad (ROP)

1	Total Area to be Decontaminated (ROP)	25,863 ft^2	
2	Labor and Equipment Cost/Work Hour	$84.89	
3	Work Rate to Steam Clean/Pressure Wash	0.0095 work hrs/ft^2	
4	Number of Hours Required to Complete Area	246 work hours	
5	**Subtotal of Labor and Equipment Cost**		$20,883
6	Volume of Decontamination Fluid	4,030 gal 7,657 ft^2 x 0.225 in x 1 ft/12 in x 7.48 gal/ft^3	
7	Number of Drums Requires to Contain Fluid for Removal (55-gallon drums)	74 drums	
8	Cost of One Drum	$56.60/drum	
9	Cost of Drums Needed to Contain Fluid		$4,188
TOTAL COST OF DECONTAMINATION BY STEAM CLEANING/PRESSURE WASHING (enter on DC-1)			**$25,071**

SAMPLING AND ANALYSIS SA-1

Facility Name: EQ Alabama, Inc.

SAMPLING AND ANALYSIS SUMMARY WORKSHEET

	ACTIVITY	WORKSHEET REFERENCE	COST
1	Boring and Subsurface Soil Samples	NA	NA
2	Concrete Core Samples	NA	NA
3	Wipe Samples	SA-3	$45,315
4	Aqueous Sample	SA-4	$9,135
5	Non-Aqueous Sample	NA	NA
6	Ground Water Sample	NA	NA
7	Soil-Pore Liquid Sample	NA	NA
8	Subsurface Soil Sample from Monitoring Well Installation	NA	NA
TOTAL SAMPLING AND ANALYTICAL COST (LINES 1-8) - Enter on CS-1 – Line 2			**$54,450**

SAMPLING AND ANALYSIS SA-2

Facility Name: EQ Alabama, Inc. Description of Sampling Activities

1 Number of Borings and Subsurface Samples – **NA**		
1a		samples
2 Number of Concrete Core Samples – **NA**		
2a		samples
3 Number of Wipe Sample Locations		
3a		14 sample locations
4 Number of Aqueous Sample Locations		
4a		3 sample locations
5 Number of Non-Aqueous Sample Locations – **NA**		
5a		sample locations
6 Number of Groundwater Sample Locations – **NA**		
6a		sample locations
7 Number of Lysimeters to be Sampled - **NA**		
7a		samples
8 Number of Subsurface Soil Samples Collected During Monitoring Well Installation – **NA**		
8a		samples

SAMPLING AND ANALYSIS SA-3

Facility Name: EQ Alabama, Inc. Wipe Sample

1 Collection of Wipe Samples			
1a	Number of Sample Locations (from SA-1)	14 sample locations (+ 1 Trip Blank)	
1b	Sample Team and Equipment Cost/Hour	$45	
1c	Hours Required to Collect One Sample	0.5 hrs/sample	
1d	Number of Hours Required to Collect All Samples	7 hours	
1e	**Cost to Collect Wipe Samples**		$315
2 Analysis of Wipe Samples			
2a	Cost of Analysis Per Sample Event (See Table Below)	$45,000/Event	
2b	Number of Sampling Events	1 Event	
2c	Cost to Analyze Wipe Samples		$45,000
TOTAL COST OF SAMPLING AND ANALYSIS OF WIPE SAMPLES (enter on SA-1)			**$45,315**

Notes: Includes cost of collection and handling of samples, vehicle rental, and decontamination of sampling team and sampling equipment.

COST OF ANALYSIS PER SAMPLING EVENT			
Analytical Parameter and Method Reference	Cost of Analysis	Number of Analyses including QC Analyses	Total Cost of Analysis Per Event
ADEM Administrative Code -335-14-5 App. IX List	$3,000	15	$45,000
TOTAL COST OF ANALYSIS OF WIPE SAMPLES			**$45,000**

SAMPLING AND ANALYSIS SA-4

Facility Name: EQ Alabama, Inc. Aqueous Sample

1 Collection of Wipe Samples			
1a	Number of Sample Locations (from SA-1)	3 sample locations	
1b	Sample Team and Equipment Cost/Hour	$45	
1c	Hours Required to Collect One Sample	1 hr/sample	
1d	Number of Hours Required to Collect All Samples	3 hours	
1e	**Cost to Collect Wipe Samples**		$135
2 Analysis of Wipe Samples			
2a	Cost of Analysis Per Sample Event (See Table Below)	$9,000/Event	
2b	Number of Sampling Events	1 Event	
2c	Cost to Analyze Wipe Samples		$9,000
TOTAL COST OF SAMPLING AND ANALYSIS OF WIPE SAMPLES (enter on SA-1)			**$9,135**

Notes: Includes cost of collection and handling of samples, vehicle rental, and decontamination of sampling team and sampling equipment.

COST OF ANALYSIS PER SAMPLING EVENT			
Analytical Parameter and Method Reference	Cost of Analysis	Number of Analyses including QC Analyses	Total Cost of Analysis Per Event
ADEM Administrative Code -335-14-5 App. IX List	$3,000	3	$9,000
TOTAL COST OF ANALYSIS OF WIPE SAMPLES			**$9,000**

TRANSPORTATION TR-1

Facility Name: EQ Alabama, Inc.

TRANSPORTATION SUMMARY WORKSHEET			
	ACTIVITY	**WORKSHEET REFERENCE**	**COST**
1	Transportation of Waste Materials to Emelle, AL	TR-2	$58,150
2	Transportation of Waste Materials to Port Arthur, TX	TR-3	$3,296
TOTAL COST OF TRANSPORTATION - Enter on CS-1 – Line 3			**$61,466**

TRANSPORTATION TR-2

Facility Name: EQ Alabama, Inc. Transportation of Waste

1 TRANSPORTATION OF DRUMMED WASTE TO: **EMELLE, AL**			
1a	Number of Waste Drums	1,147 drums	
1b	Cost to Transport One Truckload of 55-gallon Drums	$500/Truckload	
1c	Number of Truckloads Needed	15 Truckloads	
1d	Cost to Transport Drummed Waste		$7,500
2 TRANSPORTATION OF BULK LIQUIDS			
2a	Gallons of Liquid Waste	6,000 gal.	
2b	Cost to Transport One Truckload of Bulk Liquids	$650/Truckload	
2c	Number of Truckloads Needed	1 Truckload	
2d	Cost to Transport Bulk Liquid Waste		$650
3 TRANSPORTATION OF BULK SOLIDS			
3a	Number of Waste Containers	100 containers	
3b	Cost to Transport One Truckload of Bulk Waste	$500/Truckload	
3c	Number of Truckloads Needed	100 Truckloads	
3d	Cost to Transport Bulk Solid Waste		$50,000
TOTAL COST OF TRANSPORTATION OF WASTE – Enter on TR-1			**$58,150**

TRANSPORTATION TR-3

Facility Name: EQ Alabama, Inc. Transportation of Waste

1 TRANSPORTATION OF DRUMMED WASTE TO: **PORT ARTHUR, TX**			
1a	Number of Waste Drums	117 drums	
1b	Cost to Transport One Truckload of 55-gallon Drums	$1,648/Truckload	
1c	Number of Truckloads Needed	2 Truckloads	
1d	Cost to Transport Drummed Waste		$3,296
2 TRANSPORTATION OF BULK LIQUIDS			
2a	Gallons of Liquid Waste	**NA**	
2b	Cost to Transport One Truckload of Bulk Liquids	$/Truckload	
2c	Number of Truckloads Needed	Truckload	
2d	Cost to Transport Bulk Liquid Waste		$0
3 TRANSPORTATION OF BULK WASTE SOLIDS			
3a	Number of Waste Containers	**NA**	
3b	Cost to Transport One Truckload of Bulk Waste	$/Truckload	
3c	Number of Truckloads Needed	Truckloads	
3d	Cost to Transport Bulk Solid Waste		$0
TOTAL COST OF TRANSPORTATION OF WASTE – Enter on TR-1			**$3,296**

TREATMENT AND DISPOSAL TD-1

Facility Name: EQ Alabama, Inc. Treatment and Disposal

TREATMENT AND DISPOSAL SUMMARY WORKSHEET			
	Activity	Worksheet Number	Cost
1	Roll-Offs	TD-2	552,000
2	Non-Hazardous Solid Waste	TD-2	6,125
3	Liquid Hazardous Waste	TD-2	21,875
4	Hazardous Waste For Stabilization	TD-2	103,748
5	Hazardous Waste For Incineration	TD-3	25,155
6	Bulk Liquid	TD-3	8,250
7	Rinsate From Decontamination of the Site	TD-3	12,000
8	NA	TD-3	NA
TOTAL COST OF TREATMENT AND DISPOSAL (Lines 1-8) - Enter on CS-1 – Line 4			**$729,153**

TREATMENT AND DISPOSAL TD-2

Facility Name: EQ Alabama, Inc. Treatment and Disposal

1 Treatment and Disposal of Waste 1 – Roll-Offs			
1a	Volume of Waste Treated/Disposed in yds^3	1,950 yds.	
1b	Density of the Waste	2,050 lb/yds^3	
1c	Amount of Waste Treated/Disposed	4,000,000 lbs	
1d	Amount of Waste Treated/Disposed in Tons	2,000 tons	
1e	Treatment Cost	$276/ton	
1f	Cost to Treat and Dispose of Waste 1		$552,000
			Enter 0n TD-1
2 Treatment and Disposal of Waste 2 – Non-Hazardous Solid Waste			
2a	Volume of Waste Treated/Disposed	175 drums	
2b	Density of the Waste	NA	
2c	Amount of Waste Treated/Disposed	NA	
2d	Amount of Waste Treated/Disposed in Tons	NA	
2e	Treatment Cost	$35/Drum	
2f	Cost to Treat and Dispose of Waste 2		$6,125
			Enter 0n TD-1

3 Treatment and Disposal of Waste 3 – Liquid Hazardous Waste			
3a	Volume of Waste Treated/Disposed	175 Drums	
3b	Density of the Waste	NA	
3c	Amount of Waste Treated/Disposed	NA	
3d	Amount of Waste Treated/Disposed in Tons	NA	
3e	Treatment Cost	$125/drum	
3f	Cost to Treat and Dispose of Waste 3		$21,875
			Enter 0n TD-1
4 Treatment and Disposal of Waste 4 – Hazardous Waste For Stabilization			
4a	Volume of Waste Treated/Disposed	701 Drums	
4b	Density of the Waste	NA	
4c	Amount of Waste Treated/Disposed	NA	
4d	Amount of Waste Treated/Disposed in Tons	NA	
4e	Treatment Cost	$148/Drum	
4f	Cost to Treat and Dispose of Waste 4		$103,748
			Enter 0n TD-1

TREATMENT AND DISPOSAL TD-3

Facility Name: EQ Alabama, Inc. Treatment and Disposal

5 Treatment and Disposal of Waste 5 – Hazardous Waste for Incineration			
5a	Volume of Waste Treated/Disposed	117 Drums	
5b	Density of the Waste	NA	
5c	Amount of Waste Treated/Disposed	NA	
5d	Amount of Waste Treated/Disposed in Tons	NA	
5e	Treatment Cost	$215/Drum	
5f	Cost to Treat and Dispose of Waste 5		$25,155
			Enter 0n TD-1
6 Treatment and Disposal of Waste 6 – Bulk Liquid			
6a	Volume of Waste Treated/Disposed	6,000 gal	
6b	Density of the Waste	NA	
6c	Amount of Waste Treated/Disposed	NA	
6d	Amount of Waste Treated/Disposed in Tons	NA	
6e	Treatment Cost	$8,250/Load	
6f	Cost to Treat and Dispose of Waste 6		$8,250
			Enter 0n TD-1

7 Treatment and Disposal of Waste 7 – Rinsate From Decontamination of Site			
7a	Volume of Waste Treated/Disposed	96 Drums	
7b	Density of the Waste	NA	
7c	Amount of Waste Treated/Disposed	NA	
7d	Amount of Waste Treated/Disposed in Tons	NA	
7e	Treatment Cost	$125/drum	
7f	Cost to Treat and Dispose of Waste 7		$12,000
			Enter 0n TD-1
8 Treatment and Disposal of Waste 8 – NA			
8a	Volume of Waste Treated/Disposed in cu. yd.	NA	
8b	Density of the Waste	NA	
8c	Amount of Waste Treated/Disposed	NA	
8d	Amount of Waste Treated/Disposed in Tons	NA	
8e	Treatment Cost	NA	
8f	Cost to Treat and Dispose of Waste 8		NA
			Enter 0n TD-1

BULK DENSITIES OF SELECTED MATERIALS	
Material	Bulk Density/Range (lbs/cu yd)
Water	1,685.8
Sludge	1,620 – 2,430
Soil [b]	2,026 – 3,240
Incinerator Ash	945 – 1,350
Cement [a]	4,050
Demolition Rubble	2,430 – 3,240
Steel [c]	13,230

Notes:

[a] Density derived from OSWER Policy Directive #9476.00-6, 1987.

[b] Soils rich in organic matter and soils with large amounts of fine particles have lower bulk density compared with soils poor in organic matter and rich in sand particles.

[c] Densities derived from Standard Handbook for Civil Engineering, 3rd Edition, 1983.

US ecology

17440 College Parkway, Suite 300, Livonia, MI 48152
P 734.521.8000 F 734.521.8040

May 18, 2015

Mr. Abe Oberkor
Alabama Department of
Environmental Management
Land Division
1400 Coliseum Boulevard
Montgomery, AL 36110-2400

RE: Financial Assurance: Bond K08866867
EQ Alabama, Inc. (ALD 983 177 015)
Sulligent, Alabama

Dear Mr. Oberkor:

Enclosed you will find an Increase Rider for bond K08866867 in the amount of $1,410,438.00 for the 2015 annual adjustment to Closure of the above referenced facility.

Also, enclosed are revised Schedules A and B for the current Standby Trust Agreement in place. The revised schedules A and B amounts match the current 2015 revised financial assurance.

If you should have questions, please feel free to email me at april.ellsworth@usecology.com or call (734) 521-8045.

Sincerely,

April F. Ellsworth
Treasury Manager

Cc: Dan Belisle

SCHEDULE A

US EPA ID Number: ALD 983 177 015

Facility Name:EQ Alabama Inc., 51328 Highway 17, Sulligent, Alabama 35586.

The current closure cost estimate is One Million, Four Hundred Ten Thousand, Four Hundred Thirty eight and 00/100 dollars. ($1,410,438.00) as reflected in Performance Bond K08866867.

SCHEDULE B (attach Performance Bond)

US EPA ID Number: ALD 983 177 015

Facility Name:EQ Alabama Inc., 51328 Highway 17, Sulligent, Alabama 35586.

The current closure cost estimate is One Million, Four Hundred Ten Thousand, Four Hundred Thirty eight and 00/100 dollars. ($1,410,438.00) as reflected in Performance Bond K08866867.

Increase Rider

BOND NO. K08866867

To be attached and form a part of Bond No. K08866867 dated the 31st day of December, 2014, executed by Westchester Fire Insurance Company as surety, on behalf of EQ Alabama, Inc. as current principal of record, and in favor of AL Dept of Environmental Management, as Obligee, and in the amount of One Million Three Hundred Sixty Nine Thousand Seven Hundred Thirty Three Dollars and 00/100 ($1,369,733.00).

In consideration of the agreed premium charged for this bond, it is understood and agreed that Westchester Fire Insurance Company hereby consents that effective from the 6th day of May, 2015, said bond shall be amended as follows:

THE BOND PENALTY SHALL BE Increased:

FROM: One Million Three Hundred Sixty Nine Thousand Seven Hundred Thirty Three Dollars and 00/100 ($1,369,733.00)

TO: One Million Four Hundred Ten Thousand Four Hundred Thirty Eight Dollars and 00/100 ($1,410,438.00)

The Increase of said bond penalty shall be effective as of the 6th day of May, 2015, and does hereby agree that the continuity of protection under said bond subject to changes in penalty shall not be impaired hereby, provided that the aggregate liability of the above mentioned bond shall not exceed the amount of liability assumed by it at the time the act and/or acts of default were committed and in no event shall such liability be cumulative.

Signed, sealed and dated this 6th day of May, 2015.

EQ Alabama, Inc.
PRINCIPAL

BY: _____
Mario Romero, Executive Vice President

Westchester Fire Insurance Company
SURETY

BY: _____
Erin Brown, ATTORNEY-IN-FACT

GENERAL ALL-PURPOSE ACKNOWLEDGMENT

State of **Arizona**

County of **Maricopa**

On May 6, 2015 before me, **Kristin D. Thurber, Notary Public**
Name and Title of Officer (e.g., "Jane Doe, Notary Public")

personally appeared **Erin Brown**
Name(s) of Signer(s)

X Personally known to me
☐ proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacities and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the said instrument.

Kristin D. Thurber
Notary Public
County of Maricopa, Arizona
My Comm. Expires 03-25-17

WITNESS my hand and official seal.

Kristin D. Thurber
Signature of Notary Public

OPTIONAL

Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent

CAPACITY CLAIMED BY SIGNER

(__) INDIVIDUAL
(__)

TITLE(S)

(__) PARTNER(S) (__) LIMITED
(__) (__) GENERAL

(X) ATTORNEY-IN-FACT

(__) TRUSTEE(S)
(__) GUARDIAN/CONSERVATOR
(__) OTHER

SIGNER IS REPRESENTING:

NAME OF PERSON(S) OR ENTITY(IES)

Westchester Fire Insurance Company

DESCRIPTION OF ATTACHED DOCUMENT

Bond #K08866867
TITLE OR TYPE OF DOCUMENT

N/A
NUMBER OF PAGES

May 6, 2015
DATE OF DOCUMENT

N/A
Additional Signatures

ALL-PURPOSE ACKNOWLEDGMENT

State of Michigan

County of Wayne

On May 14, 2015, before me, Amanda Marek, Notary Public

personally appeared Mario Romero, Executive Vice President

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Michigan that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Amanda Marek

Signature of Notary

AMANDA MAREK
Notary Public - Michigan
Wayne County
My Commission Expires Dec 22, 2018
Acting in the County of Wayne

Power of Attorney

WESTCHESTER FIRE INSURANCE COMPANY

Know all men by these presents: That **WESTCHESTER FIRE INSURANCE COMPANY**, a corporation of the Commonwealth of Pennsylvania pursuant to the following Resolution, adopted by the Board of Directors of the said Company on December 11, 2006, to wit:

"RESOLVED, that the following authorizations relate to the execution, for and on behalf of the Company, of bonds, undertakings, recognizances, contracts and other written commitments of the Company entered into the ordinary course of business (each a "Written Commitment"):

(1) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized to execute any Written Commitment for and on behalf of the Company, under the seal of the Company or otherwise.

(2) Each duly appointed attorney-in-fact of the Company is hereby authorized to execute any Written Commitment for and on behalf of the Company, under the seal of the Company or otherwise, to the extent that such action is authorized by the grant of powers provided for in such persons written appointment as such attorney-in-fact.

(3) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized, for and on behalf of the Company, to appoint in writing any person the attorney-in-fact of the Company with full power and authority to execute, for and on behalf of the Company, under the seal of the Company or otherwise, such Written Commitments of the Company as may be specified in such written appointment, which specification may be by general type or class of Written Commitments or by specification of one or more particular Written Commitments.

(4) Each of the Chairman, the President and Vice Presidents of the Company is hereby authorized, for and on behalf of the Company, to delegate in writing any other officer of the Company the authority to execute, for and on behalf of the Company, under the Company's seal or otherwise, such Written Commitments of the Company as are specified in such written delegation, which specification may be by general type or class of Written Commitments or by specification of one or more particular Written Commitments.

(5) The signature of any officer or other person executing any Written Commitment or appointment or delegation pursuant to this Resolution, and the seal of the Company, may be affixed by facsimile on such Written Commitment or written appointment or delegation.

FURTHER RESOLVED, that the foregoing Resolution shall not be deemed to be an exclusive statement of the powers and authority of officers, employees and other persons to act for and on behalf of the Company, and such Resolution shall not limit or otherwise affect the exercise of any such power or authority otherwise validly granted or vested."

Does hereby nominate, constitute and appoint Brandy L Baich, David G Jensen, Erin Brown, Ethan Baker, Kristen Thurber, Vicki L Breunig, all of the City of PHOENIX, Arizona, each individually if there be more than one named, its true and lawful attorney-in-fact, to make, execute, seal and deliver on its behalf, and as its act and deed any and all bonds, undertakings, recognizances, contracts and other writings in the nature thereof in penalties not exceeding Twenty million dollars & zero cents ($20,000,000.00) and the execution of such writings in pursuance of these presents shall be as binding upon said Company, as fully and amply as if they had been duly executed and acknowledged by the regularly elected officers of the Company at its principal office.

IN WITNESS WHEREOF, the said Stephen M. Haney, Vice-President, has hereunto subscribed his name and affixed the Corporate seal of the said **WESTCHESTER FIRE INSURANCE COMPANY** this 21 day of July 2014.

WESTCHESTER FIRE INSURANCE COMPANY

Stephen M. Haney

Stephen M. Haney , Vice President

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA ss.

On this 21 day of July, AD. 2014 before me, a Notary Public of the Commonwealth of Pennsylvania in and for the County of Philadelphia came Stephen M. Haney ,Vice-President of the **WESTCHESTER FIRE INSURANCE COMPANY** to me personally known to be the individual and officer who executed the preceding instrument, and he acknowledged that he executed the same, and that the seal affixed to the preceding instrument is the corporate seal of said Company; that the said corporate seal and his signature were duly affixed by the authority and direction of the said corporation, and that Resolution, adopted by the Board of Directors of said Company, referred to in the preceding instrument, is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal at the City of Philadelphia the day and year first above written.

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
KAREN E. BRANDT, Notary Public
City of Philadelphia, Phila. County
My Commission Expires September 26, 2014

Karen E Brandt

Notary Public

I, the undersigned Assistant Secretary of the **WESTCHESTER FIRE INSURANCE COMPANY**, do hereby certify that the original POWER OF ATTORNEY, of which the foregoing is a substantially true and correct copy, is in full force and effect.

In witness whereof, I have hereunto subscribed my name as Assistant Secretary, and affixed the corporate seal of the Corporation, this 6th day of May, 2015

William L. Kelly

William L. Kelly, Assistant Secretary

THIS POWER OF ATTORNEY MAY NOT BE USED TO EXECUTE ANY BOND WITH AN INCEPTION DATE AFTER July 21, 2016.

EQ Alabama, Inc.
ALD 983 177 015
2015 Annual Adjustment to Closure Cost Estimate

Cost Estimate from Pemit - 4/7/2005:		$1,168,553
Inflation Factor	Undetermined	
Cost Estimate 2011		**$1,318,098**
Inflation Factor	1.0210	
Cost Estimate 2012		**$1,345,778**
Inflation Factor	1.0178	
Cost Estimate 2013		**$1,369,733**
Inflation Factor	1.0151	
Cost Estimate 2014		**$1,390,416**
Inflation Factor	1.0144	
Cost Estimate 2015		**$1,410,438**

Inflation Factor Provided By: Abe Oberkor

Send Revised Financial Instrument To:

Abe Oberkor
Alabama Department of
Environmental Management
Land Division
1400 Coliseum Boulevard
Montgomery, AL 36110-2400

Prepared By: Dan Belisle
EHS Manager

Reference Insurer:

American International Specialty Lines Insurance Company
Policy Number: EPP 808 9584
Effective Date: September 30, 2003

Section J

Other Federal Laws

J-1 COMPLIANCE WITH OTHER FEDERAL LAWS

EQ Alabama, Inc. (EQAL) is in compliance with other federal laws as required by 40 CFR Part 270.3 and ADEM Administrative Code at 335-14-8-.01(3).

EQAL does not have a direct adverse effect on the values for which the National Wild and Scenic Rivers Act was established. 16 U.S.C. 1273 et seq.

The EQAL site is not impacted by the National Historic Preservation Act of 1966. 16 U.S.C. 470 et seq.

Activities at EQAL are not likely to jeopardize the continued existence of any endangered or threatened species or adversely affect its critical habitat as established by The Endangered Species Act. 16 U.S.C. 1531 et seq.

EQAL is not located within a coastal zone therefore it is not impacted by The Coastal Zone Management Act. 16 U.S.C. 1451 et seq.

The EQAL facility is not impounding, diverting, controlling, or modifying any body of water as regulated by the Fish and Wildlife Coordination Act. 16 U.S.C. 661 et seq.

SECTION K

CERTIFICATION

K-1 Application Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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."

Shanda Murff
Signature

05/20/15
Date

Shanda Murff
Printed Name

Operations Supervisor
Title

A USEcology Company

July 11, 2014

Subject: Delegation of Signing Authority

To whom it may concern:

As a Responsible Corporate Officer of EQ Alabama, Inc., I due hereby delegate to the Director of Operations, General Manager or Facility Manager with day-to-day operational authority of the respective company's facility, the authority of signing letters, reports, applications and forms or other required documents requested or required by governmental agencies on behalf of
EQ Alabama, Inc.

Sincerely,

Simon Bell
Vice President, EQ Alabama, Inc.

36255 Michigan Ave. | Wayne, MI 48184 | P: (800) 592-5489 | F: (800) 592-5329 | eqonline.com

SECTION L

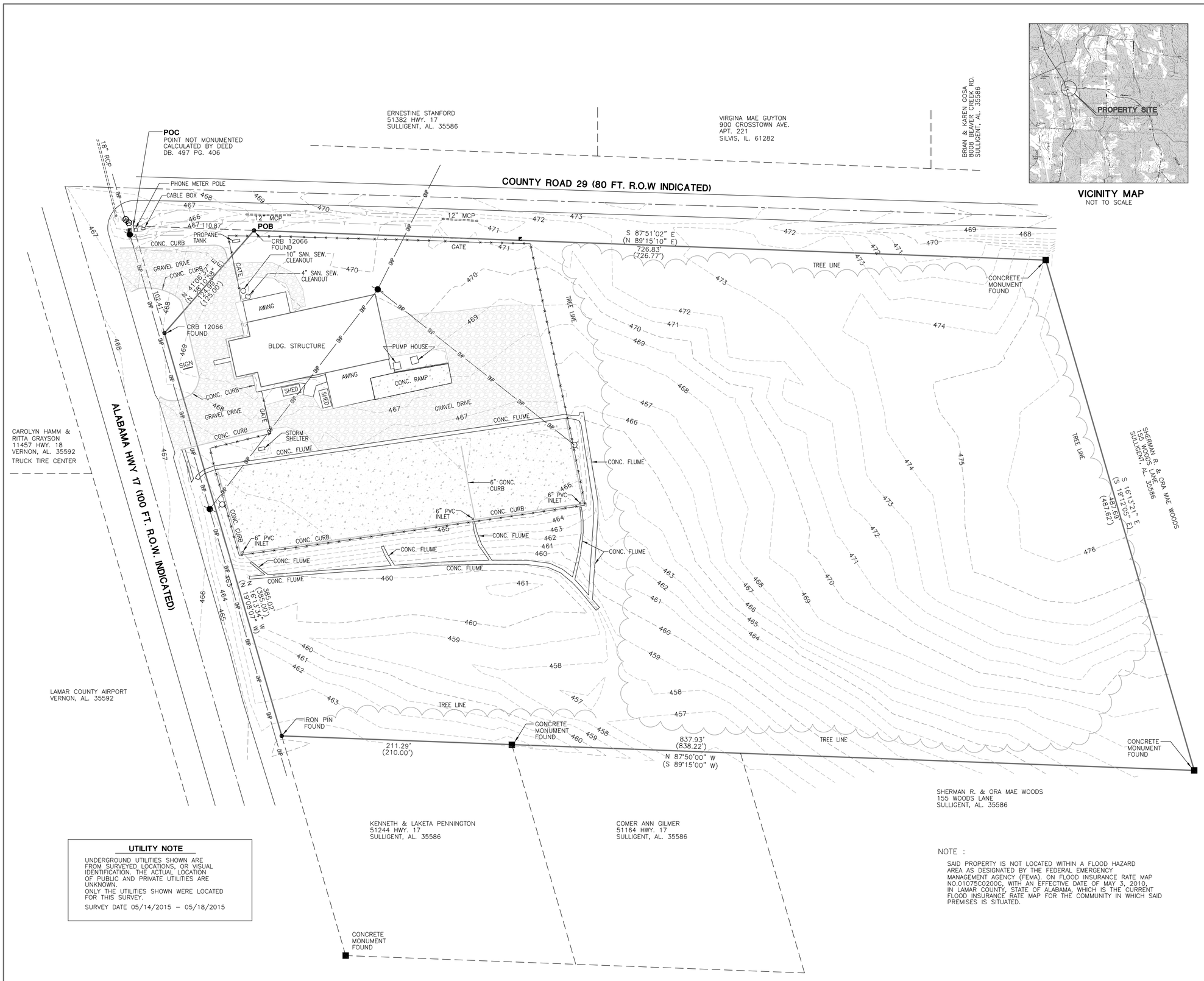
Not Applicable

Section M

Not Applicable

Section N

Figure/Drawings



VICINITY MAP
NOT TO SCALE

UTILITY NOTE

UNDERGROUND UTILITIES SHOWN ARE FROM SURVEYED LOCATIONS, OR VISUAL IDENTIFICATION. THE ACTUAL LOCATION OF PUBLIC AND PRIVATE UTILITIES ARE UNKNOWN.
ONLY THE UTILITIES SHOWN WERE LOCATED FOR THIS SURVEY.

SURVEY DATE 05/14/2015 – 05/18/2015

NOTE :

SAID PROPERTY IS NOT LOCATED WITHIN A FLOOD HAZARD AREA AS DESIGNATED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA), ON FLOOD INSURANCE RATE MAP NO.01075C0200C, WITH AN EFFECTIVE DATE OF MAY 3, 2010, IN LAMAR COUNTY, STATE OF ALABAMA, WHICH IS THE CURRENT FLOOD INSURANCE RATE MAP FOR THE COMMUNITY IN WHICH SAID PREMISES IS SITUATED.

LEGEND EXISTING

- EXISTING WATER LINE
- EXISTING UNDERGROUND ELECTRICAL LINES
- EXISTING OVERHEAD ELECTRICAL LINES
- EXISTING SANITARY SEWER LINE
- EXISTING GAS LINE
- EXISTING UNDERGROUND CABLE TELEVISION
- EXISTING UNDERGROUND TELEPHONE
- EXISTING FIBER OPTIC LINE
- EXISTING CONTOUR ELEVATION
- EXISTING SANITARY SEWER MANHOLE
- EXISTING STORM SEWER MANHOLE
- EXISTING UTILITY POLE
- EXISTING WATER HYDRANT
- EXISTING WATER VALVE
- EXISTING WATER METER
- EXISTING GAS VALVE
- EXISTING GAS METER
- EXISTING ELECTRICAL TRANSFORMER
- EXISTING LIGHT POLE
- EXISTING PHONE OR CABLE PEDESTAL
- GUIDE WIRE
- EXISTING FENCE

SURVEY LEGEND

- IRON PIPE FOUND. (SIZE INDICATES INSIDE DIAMETER).
- CONCRETE MONUMENT FOUND.
- PK NAIL FOUND.
- RAILROAD SPIKE FOUND.
- 1/2" REBAR PIPE SET WITH CAP STAMPED: CA00023
- 4" X 4" CONCRETE MONUMENT MONUMENT SET STAMPED: CA00023
- PK NAIL FOUND WITH DISK STAMPED: CA00023
- TRAVERSE POINT.
- PP – PINCHED PIPE.
- ( ) – RECORD.
- – NOT TO SCALE.
- Ac – ACRES.
- ℄ – CENTERLINE
- D.B. – DEED BOOK.
- ESMNT – EASEMENT.
- MBL – MINIMUM BUILDING LINE.
- OD – OUTSIDE DIAMETER.
- P.B. – PLAT BOOK.
- PG. – PAGE.
- RE.MON. – REFERENCE MONUMENT.
- ROW – RIGHT OF WAY.
- U & D – UTILITY & DRAINAGE.

Source of Title:

Deed Book 497, at Page 406
Probate Office of Lamar County, Alabama

BEING IN AND PART OF THE SE1/4 OF THE NE1/4, OF SECTION 16, TOWNSHIP 14 SOUTH, RANGE 15 WEST LAMAR, COUNTY ALABAMA

N

0' 40' 80' 120'

Graphic Scale: 1"=40'
GPS READINGS 05/14/2015

DATE	REVISION

BOUNDARY SKETCH TOPO AND SITE LOCATION

2135 University Blvd.
Suite A
Tuscaloosa, Alabama. 35401
(205) 752-4037

CFM Group
Civil and Environmental Engineers, Scientists, Planners, and Surveyors

BOUNDARY SKETCH TOPO AND SITE LOCATION FOR EQ ALABAMA SULLIGENT, ALABAMA

REQUESTED BY: EQ ALABAMA
TYPE OF DRAWING: BOUNDARY / TOPO / LOCATION
JOB NUMBER: 7515107
DATE: 05/19/2015
DRAWN BY: TDE
CHECKED BY: TDK
SCALE: AS SHOWN
FILE: 7515107
SHEET NO. 1

REVISIONS	
DESCRIPTION	DATE

1

1000 ft from Facility

No 100-Year Floodplains on Map

Residence

1000 ft from Facility

Residences

1000 ft from Facility

Private Water Well

Private Water Wells

Inactive USGS Well

Residences

Unnamed Tributary to Yellow Creek

Residence

1000 ft from Facility

0’ 300’ 600’ 900’

1

2135 University Blvd., Suite A
Tuscaloosa, Alabama. 35401
(205) 752-4037

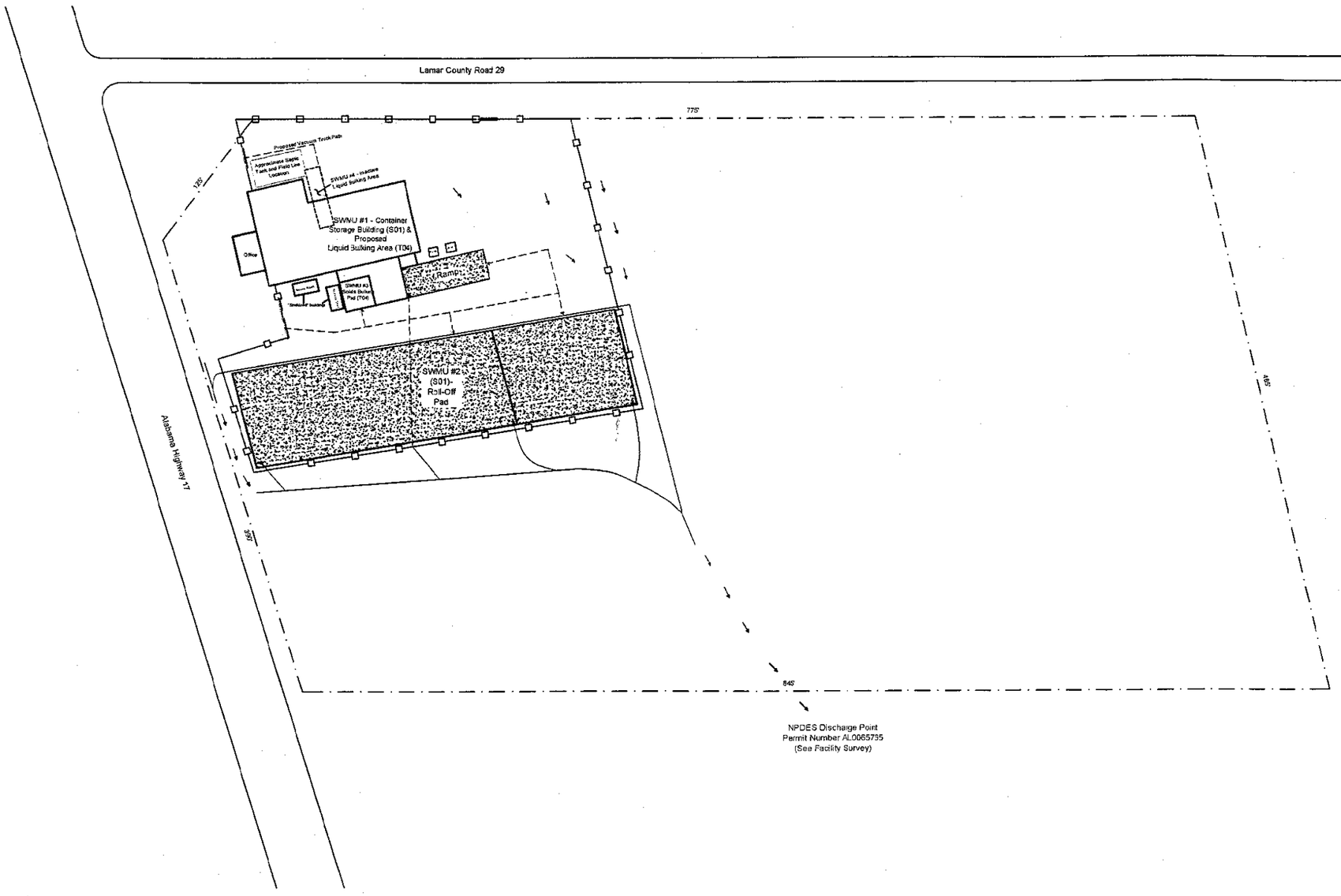
CFM Group

CM and Environmental Engineers, Scientists, Planners, and Surveyors

AREA MAP

EQ ALABAMA

JOB NUMBER: 7515107	SCALE: AS SHOWN
DATE: 05/21/15	
DRAWN BY: RAD	
CHECKED BY:	
SHEET NO.	FILE: 7515107
REVISIONS	DATE:



N

1" = 100'

- Property Line
- Fence
- Gate
- Drainage Ditch
- Storm Drain
- Concrete
- Drainage Direction
- Traffic Pattern

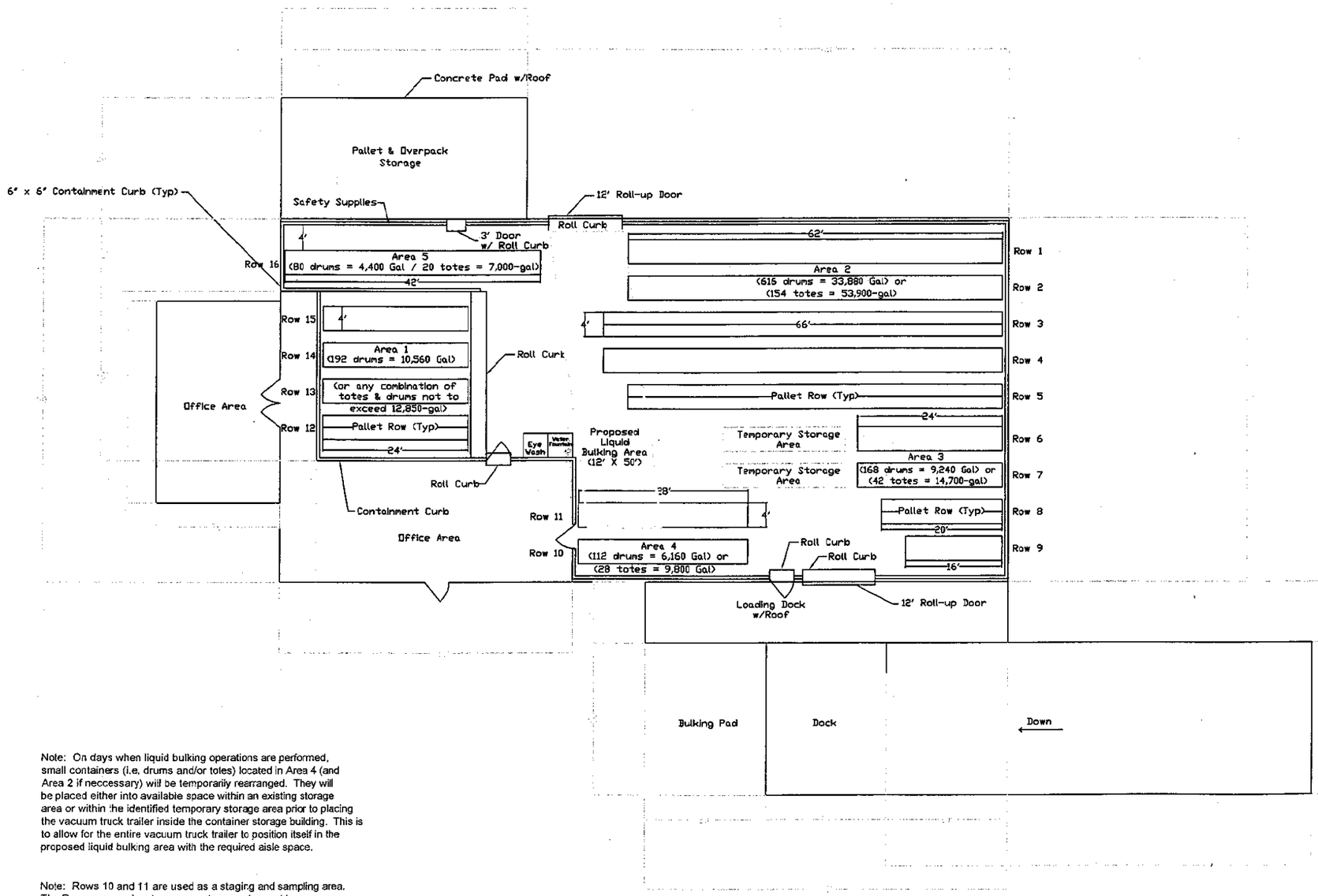
TTL
Technology and Tradition
3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401
205.345.0816 ■ Fax 205.343.0619

TTL PROJECT NO: 060103-071

REVISION DATE: April 7, 2005

FIGURE 2

Facility Layout
Terra First, Inc.
Alabama Storage Operations
Vernon, Alabama



Note: On days when liquid bulking operations are performed, small containers (i.e. drums and/or totes) located in Area 4 (and Area 2 if neccessary) will be temporarily rearranged. They will be placed either into available space within an existing storage area or within the identified temporary storage area prior to placing the vacuum truck trailer inside the container storage building. This is to allow for the entire vacuum truck trailer to position itself in the proposed liquid bulking area with the required aisle space.

Note: Rows 10 and 11 are used as a staging and sampling area. The Rows are used as temporary storage when not in use as a sampling area.

Total Container Storage Building Capacity = 1168 55-gal drums or up to 104,250-gal including the proposed 6,000-gal tanker truck and storing 350-gal totes.

Area 1 capacity = 12,850-gal (1,285-gal of containment) of drums and/or totes

Areas 2-5 capacity = 85,400-gal + 6,000-gal tanker = 91,400-gal (9,400-gal of containment) This capacity is the maximum possible if totes are stored stacked two high in Areas 2, 3, 4, and 5.

N

1" = 20'

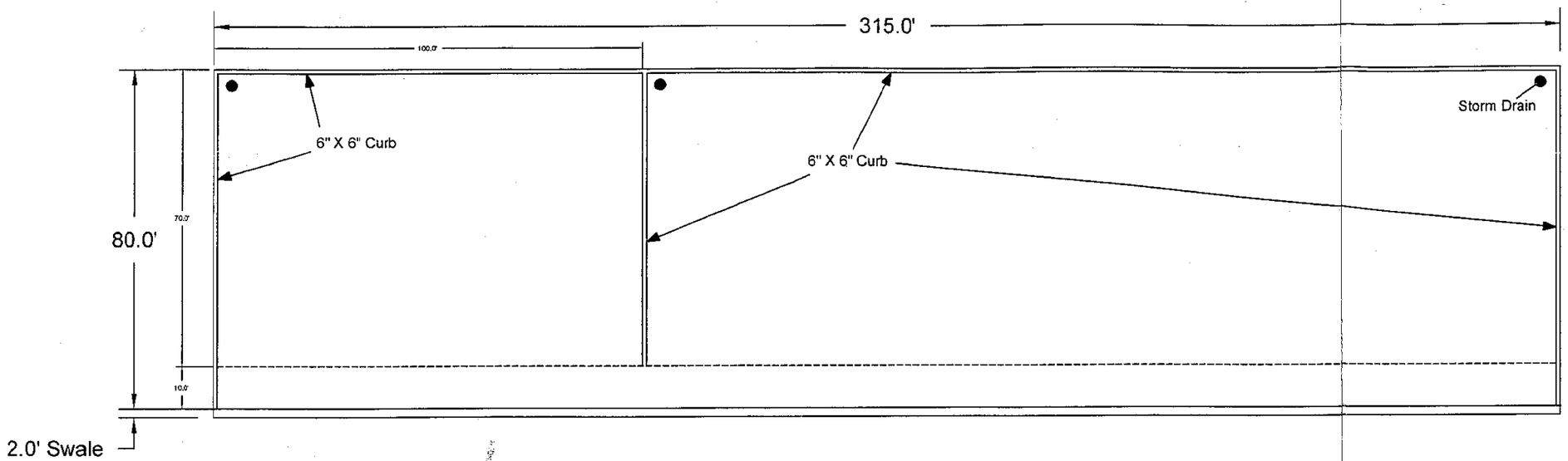
Modified from drawing prepared by
The Environmental Group
Environmental Management
Crestwood, Kentucky
9/7/92

TTL
Technology and Tradition
3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401
205.345.0816 ■ Fax 205.343.0619

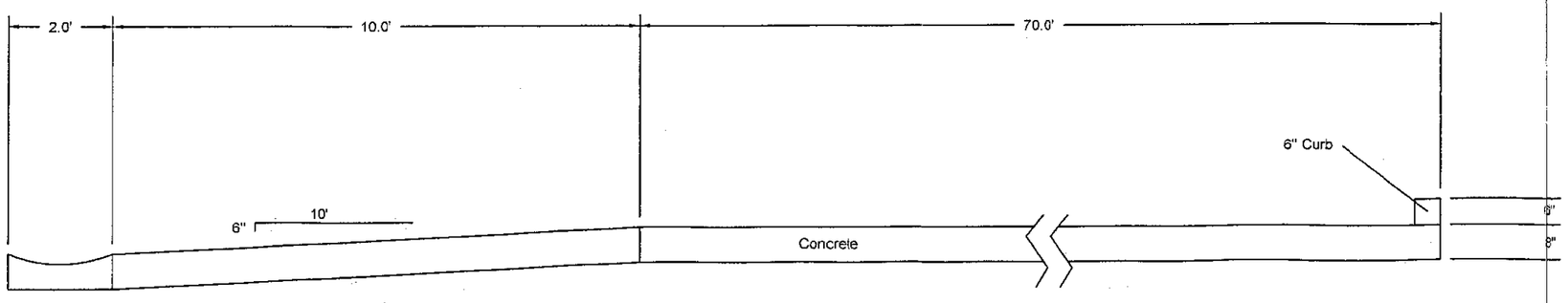
TTL PROJECT NO: 060103-071
PROJECT DATE: 07/28/04
Revision: 04/07/05

Figure 3

Container Storage Building
Terra First, Inc.
Alabama Storage Operations
Vernon, Alabama



Roll-Off and
Trailer Storage
1" = 30'

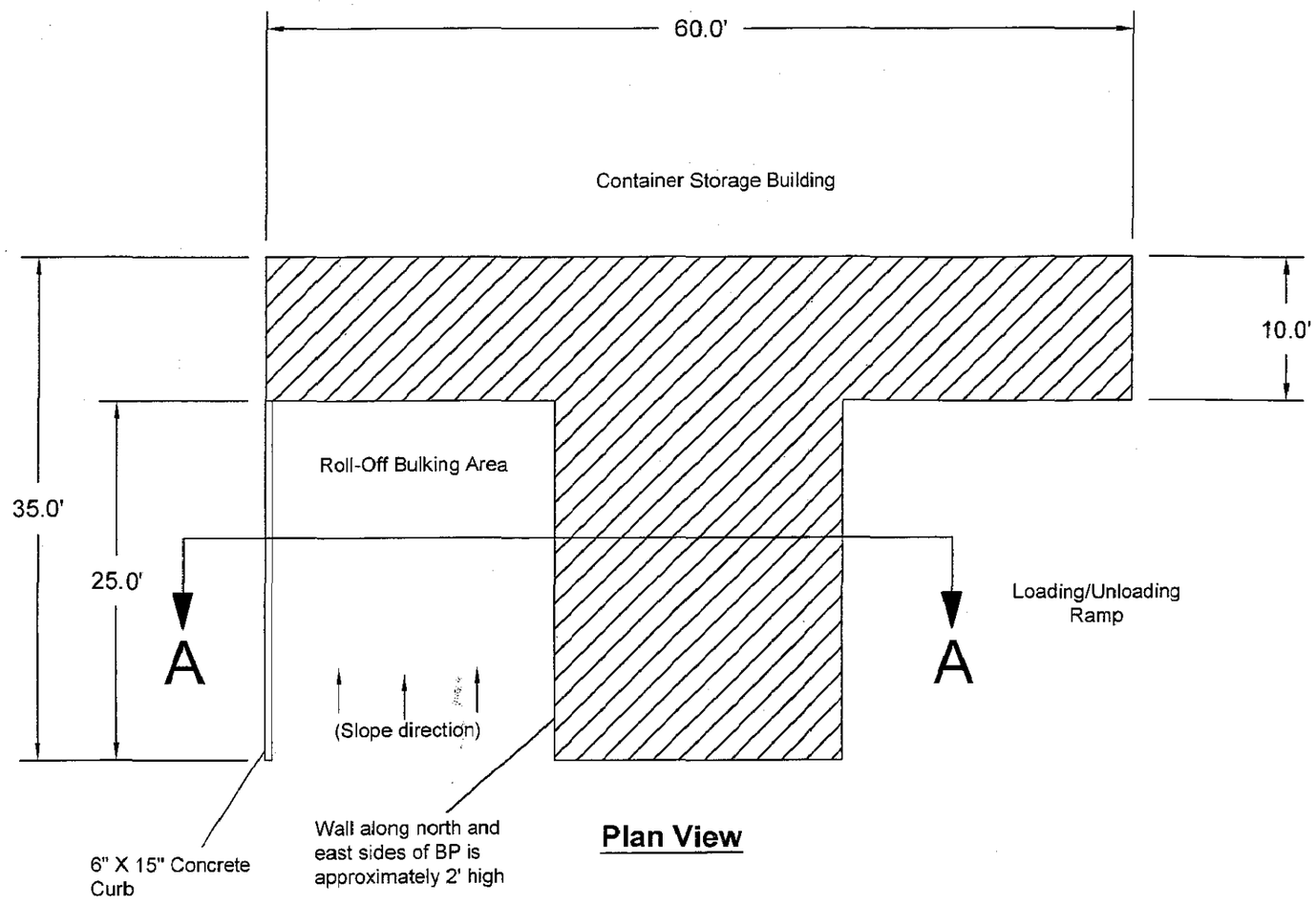


Typical Cross Section
Not To Scale

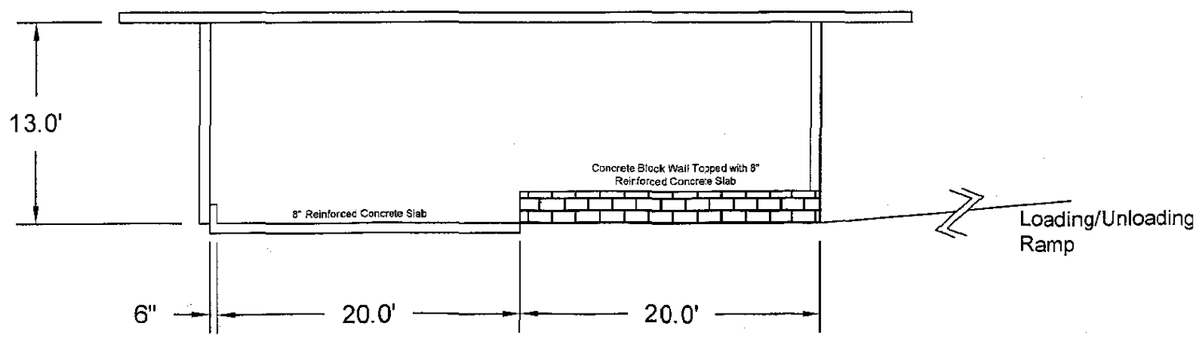
TTL
Technology and Tradition
Tuscaloosa, Alabama 35401
Fax 205.343.0619
3516 Greensboro Avenue
205.345.0816

TTL PROJECT NO: 060103-071
PROJECT DATE: September 2004

FIGURE 4
Roll-Off Pad Detail
Terra First, Inc.
Alabama Storage Operations
Vernon, Alabama



Plan View



Section A - A

1" = 10'

Denotes Concrete Loading Dock at same elevation as the Container Storage Building Slab

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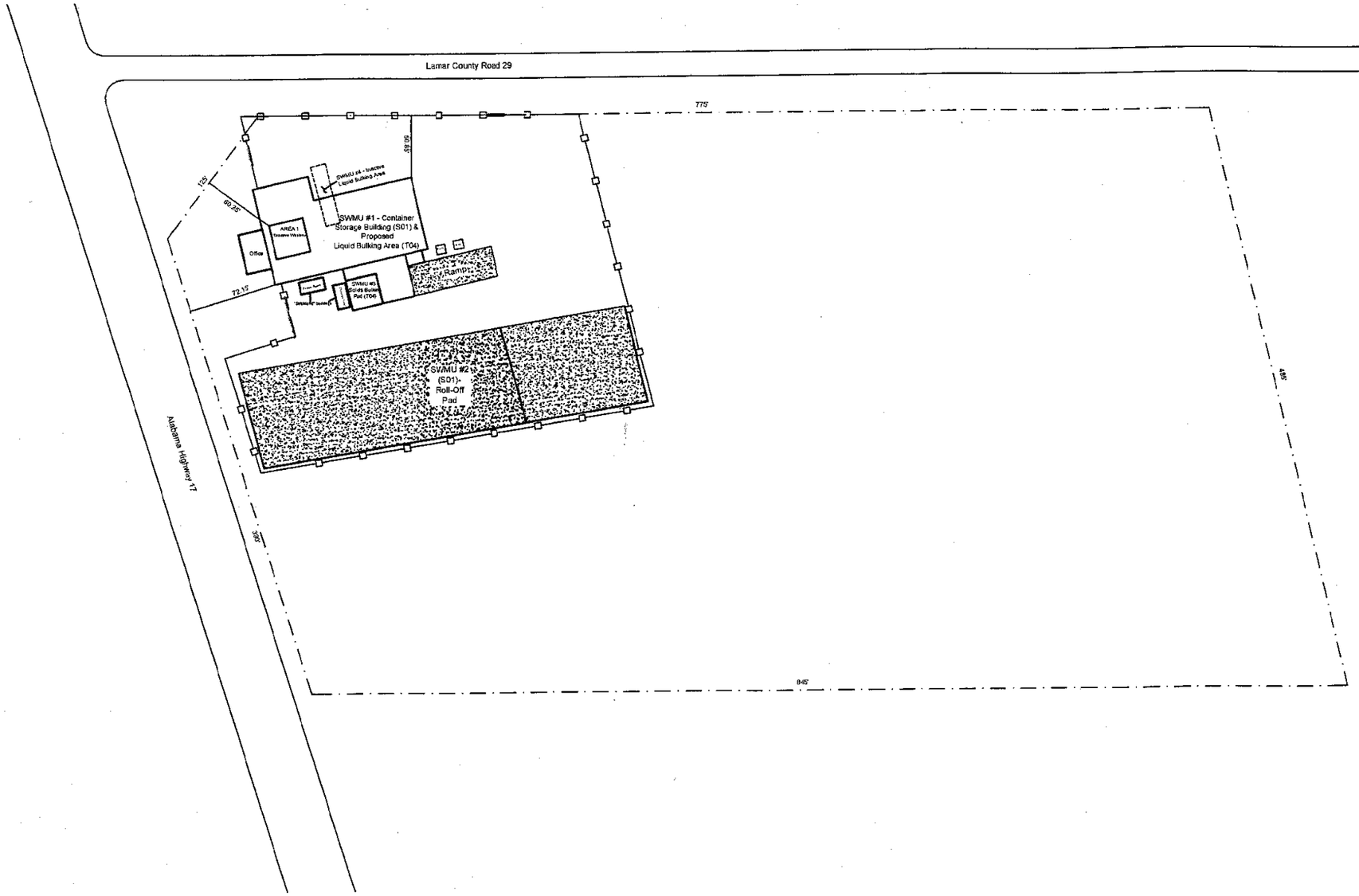
PROJECT DATE: April 7, 2005

FIGURE 5

Solids Bulking Pad Detail
Terra First, Inc.
Alabama Storage Operations
Vernon, Alabama



N

1" = 100'

Property Line

Fence

Gate

Concrete

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FIGURE 6

Storage Areas Distance
from Property Lines
Terra First, Inc.
Alabama Storage Operations
Vernon, Alabama