REGION 6
DALLAS, TX 75270

October 31, 2024

David DeSha
Director Environmental Compliance
Safety-Kleen Systems, Inc.
1722 Cooper Creek Rd.
Denton, Texas 76208

RE: The United States Environmental Protection Agency (EPA) Region 6 Reauthorization Approval for Commercial Storage of Polychlorinated Biphenyls (PCBs) at Safety-Kleen Systems, Inc., in Denton, Texas; EPA ID No. TXD077603371

Dear Mr. DeSha:

This letter and the enclosed Conditions of Approval grants approval to Safety-Kleen Systems, Inc., for commercial storage of PCB waste at its facility in Denton, Texas. The EPA provided notice via postcard mailers along with a publication of public notice in the Denton Record-Chronicle newspaper, announcing the proposed approval which opened a 45-day comment period. The EPA's responses to all significant comments will be available on the EPA PCB website (https://www.epa.gov/pcbs).

Violation of 40 CFR Part 761 or any of the enclosed Conditions of Approval may subject Safety-Kleen, Inc. Texas to enforcement action under the Toxic Substances Control Act (TSCA) and/or other applicable laws and regulations. Such action could result in a termination, revocation, or modification of the approval. This approval becomes effective on the date of this letter and expires at midnight, the same day and month, five years later.

If you have questions, please contact Harry Shah at (214) 665-6457 or shah.harry@epa.gov.

Sincerely,

Helena Healy

Helena Healy
Director
Land, Chemicals and Redevelopment Division

Enclosure

cc: Charly Fritz (TCEQ)

Safety Kleen - Denton Storage Approval and Supporting Documents Contents:

PCB COMMERCIAL STORAGE
CONDITIONS OF APPROVAL
SAFETY-KLEEN SYSTEMS, INC., DENTON, TEXAS

The terms and abbreviations in these conditions are in accordance with those defined in 40 CFR § 761.3, unless otherwise noted. The term "Facility" hereinafter refers to Safety-Kleen Systems, Inc., Denton, Texas.

I. LOCATION OF FACILITY

The Facility is located at 1722 Cooper Creek Road in Denton, Texas.

II. PCB STORAGE AREAS AND WASTES AUTHORIZED

A. PCB WASTE AUTHORIZED

Liquid and solid polychlorinated biphenyls (PCBs) and PCB Items.

B. PCB STORAGE AREAS & MAXIMUM CAPACITY AUTHORIZED

The Facility shall comply with 40 CFR § 761.65 (Storage for disposal) in the following authorized storage area and maximum allowed inventories:

1. Bay Area B, Container Storage Area 3: A container storage area with a maximum allowable PCB storage capacity of 4,950 gallons, or the equivalent of ninety (90) 55-gallon drums.

C. AUTHORIZATION TO OPERATE ADDITIONAL PCB STORAGE AREAS

1. For a new PCB storage area not identified in II. B. above, the Facility shall not commence storage in the new storage area until it has notified the U.S. Environmental Protection Agency (EPA) Region 6 PCB Coordinator and received a written approval authorizing the new area for PCB storage.

2. For expansion in capacity or major modification of an existing PCB storage area, the Facility shall not store PCBs in the modified area until it has notified the EPA Region 6 PCB Coordinator and received a written approval for the expansion or modification of the area. A major modification shall be defined as a change in the configuration or location of those authorized PCB storage areas listed in II. B. above.

D. WASTE CHARACTERIZATION AND ACCEPTANCE

1. The Facility shall implement and follow the waste acceptance procedures specified in the facility's PCB Waste Analysis Plan, included in Appendix 1 of this approval [40 CFR §761.65(d)(4)(iv)].

III. PCB STORAGE AREA OPERATION

A. GENERAL OPERATING REQUIREMENTS

1. The Facility shall operate and maintain all storage areas and systems of treatment and control in accordance with the Facility application and subsequent amendments to the application, the conditions of this approval, and the PCB regulations (40 CFR Part 761).

2. The Facility is responsible for the actions of all employees, agents, contractors, or others involved in commercially storing PCBs at the Facility. Also, the Facility is responsible for complying with all other applicable federal, state, and local statutes and regulations.

B. PCB STORAGE AREA OPERA TING REQUIREMENTS

1. The Facility shall store PCBs and PCB Items only in the areas designated in condition II. B.

2. Adequate aisle space shall be maintained to allow for unobstructed access to all PCB Items stored on-site by personnel, fire protection equipment, and decontamination equipment.

3. The Facility shall not exceed the maximum storage inventory of PCBs indicated in condition II. B. Requests for increasing the maximum inventory shall be submitted and approved by the EPA in writing prior to storage of additional PCB inventory.

C. STORAGE CLOSURE AND FINANCIAL REQUIREMENTS

1. The Facility shall comply with the closure regulations pursuant to § 761.65(d)-(g), except for any requirements that are specifically waived in this approval.

2. The Closure Cost Estimate shall be updated to adjust for inflation annually, or within 30 days after EPA approval of any modification to the Closure Plan that increases the expected costs of closure.

3. The Facility shall amend the Closure Plan and current Closure Cost Estimate whenever changes in operating plans or Facility design affect the Closure Plan, or whenever there is a change in the expected year of closure. In the even the Facility becomes aware of information that tends to show that the estimated costs associated with performing closure of the Facility may exceed the current Closure Cost Estimate approved by EPA, the Facility shall modify the Closure Plan and submit any modifications to the Closure Plan to EPA for approval.

4. Financial assurance, at least equivalent to that specified in § 761.65(g) and 40 CFR Part 264, Subpart H, shall be maintained by the Facility to provide funding for proper

closure. The closure plan shall also provide for the decontamination and/or disposal of PCB-contaminated equipment and materials at an EPA approved PCB disposal facility.

5. Any payment required to establish or continue the financial assurance mechanism used to satisfy the financial requirements shall be made when due. Written verification of the payments shall be provided to the EPA Region 6 PCB Coordinator within 30 days of the payment due dates. The Facility shall also submit such documentation as EPA may require determining whether the financial assurance requirements for this approval have been met.

6. The Facility shall submit documentation of continued financial assurance annually to the EPA Region 6 PCB Coordinator.

7. The Facility shall notify the EPA Region 6 PCB Coordinator at least 60 days prior to the date closure is expected to begin.

8. Upon termination of PCB storage activities, the Facility shall proceed according to the provisions of the approved Closure Plan. The word "termination" means cessation of PCB storage operations required by expiration, termination, or revocation of this approval.

IV. STANDARD APPROVAL CONDITIONS

A. SEVERABILITY

The conditions of this authorization are severable, and if any provision of this authorization, or any application of any provision is held invalid, the remainder of this authorization shall not be affected thereby.

B. DEPARTURE FROM APPROVAL CONDITIONS

If at any time the Facility becomes aware of any violation of the conditions of this Approval, the Facility shall notify the EPA Region 6 PCB Coordinator at (214) 665-6457 within 24 hours and shall submit a written report within five (5) days.

C. FAILURE TO SUBMIT INFORMATION

When Facility officials become aware that it has failed to submit any relevant facts in the PCB storage application, or submitted incorrect information in any report to EPA, the Facility shall submit such facts or information to the EPA Region 6 PCB Coordinator within 30 days.

D. PERMITS

During PCB storage, the Facility shall comply with all Federal, State, and local regulations and agreements, including:

1. permits for the storage of PCBs, and

2. the applicable RCRA hazardous waste regulations.

E. DUTY TO PROTECT THE ENVIRONMENT

The Facility shall correct any adverse impact on the environment resulting from noncompliance with this approval.

1. *Condition to modify, revoke and reissue, or terminate the Approval***.** EPA reserves the right to modify (including by imposing additional conditions), revoke and reissue, or terminate this Approval when any of the following circumstances exist:

   a. EPA has reason to believe the approved activities are not achieving the relevant standards or goals or otherwise are not in compliance with the Approval.

   b. EPA has reason to believe the approved activities present or may present an unreasonable risk of injury to health or the environment;

   c. EPA becomes aware of new or previously undisclosed information that may substantively impact its previous finding of no unreasonable risk and require modifications to this Approval; or

   d. EPA issues new regulations or standards that impact conditions of this Approval.

2. *Condition to require additional information***.** When any of the circumstances described above exist, EPA reserves the right to require the facility to provide additional information relevant to the Agency's determination whether to modify, revoke and reissue, or terminate the Approval. This may include information to inform EPA's finding that the approved activity does not present an unreasonable risk of injury to health or the environment, such as information related to the risks or impacts of the activity on surrounding communities and communities with environmental justice concerns, including those related to climate change and cumulative impacts of environmental and other burdens.

3. *Condition to provide additional information.* If the facility becomes aware of new or previously undisclosed information that may substantively impact EPA's previous finding that approved activities do not present an unreasonable risk of injury to health or the environment, the facility must provide that information to the Agency as soon as possible but no later than 30-days. This may include information related to the risks or impacts of the approved activity on surrounding communities and communities with environmental justice concerns, including those related to climate change and cumulative impacts of environmental and other burdens.

F. WORKER PROTECTION

1. The Facility shall comply with the health and safety practices described in the application. Personnel safety requirements and procedures for PCB handling, storage, and transport (if applicable) shall comply with Occupational Safety and Health Administration regulations applicable to this Facility.

2. The Facility shall comply with its PCB training plan. All employees who handle PCBs and PCB Items at the Facility shall receive the training, as specified in the Facility training plan. The training shall include a discussion of PCB regulatory requirements, including the requirements of the PCB Spill Cleanup Policy pursuant to §§ 761.120-135. The training shall include the specifics of the Safety Plan, Contingency Plan, and the Emergency Procedures, as well as the Spill Prevention Control and Countermeasure (SPCC) Plan. A signature sheet shall be included as part of the training to verify personnel participation. Employees shall be re-trained every year. All new employees shall be trained before handling PCBs and PCB Items.

G. MAINTENANCE

1. The Facility shall have in place a routine inspection and maintenance program for all equipment and/or systems of treatment and control (and related appurtenances) which are installed or used to achieve compliance with the conditions of this approval.

2. The Facility shall take every reasonable effort to ensure all vehicles used for the transport of PCBs and PCB Items to the Facility meet DOT regulations for the transport of PCBs and be properly marked in accordance with § 761.40. Upon discovering any transporter non-compliance with applicable TSCA regulations, the Facility will take efforts to advise transporters of PCB waste that they shall notify EPA of their PCB waste activities by filing EPA Form 7710-53, "Notification of PCB Activity," prior to engaging in PCB waste handling activities.

H. EMERGENCIES AND CONTINGENCY PLANS

1. The Facility shall follow the SPCC and Contingency Plan whenever there is a release of PCBs. A copy of these plans, along with a copy of this approval, shall be kept onsite in an area easily accessible to employees who handle PCBs. The SPCC and Contingency Plan shall be amended, and a copy sent to EPA immediately after any of the following events:

   a. the plan is found inadequate during an emergency,

   b. the Facility changes its design or operating methods pursuant to Condition II.C.,

   c. the list of emergency coordinators or equipment changes affecting this TSCA Commercial PCB Storage Authorization, or

   d. a revision is warranted that will lessen the risk ·of injury to health or the environment relative to this TSCA Commercial PCB Storage Authorization.

2. The PCB spills occurring at the Facility shall be cleaned up immediately to levels required by the PCB Spill Cleanup Policy. The Facility shall submit reports monthly of any PCB spill(s) occurring within the previous 30-day period if any such spill(s) occurs, and what action was taken to remediate the spill(s).

3. The release of PCBs into the environment is cause for the Facility to immediately initiate clean-up. The Facility shall also initiate an investigation into the cause and potential impact of the release and provide a detailed written report to the EPA Region 6 PCB Coordinator within 30 days of the discovery of the release.

4. Any PCB spills or releases occurring at the Facility, or from any PCB transport vehicle, shall be cleaned up according to the PCB Spill Cleanup Policy, 40 CFR Part 761, Subpart G. The EPA may order cessation of further PCB storage and/or treatment at the Facility if spills or releases are not cleaned up to acceptable levels as defined by EPA.

5. Emergency contacts, telephone numbers, and emergency exit routes shall be posted in prominent locations throughout the Facility.

6. The Facility shall maintain an adequately trained emergency coordinator(s) who shall be available, or on-call at all times to direct emergency procedures as outlined in the Contingency Plan.

7. The Facility shall maintain in good working order any equipment required to deal with these emergencies. The Facility shall keep in good working order the following emergency equipment:

    a. an internal communication or alarm system capable of providing immediate emergency notification to Facility personnel;

    b. communication devices capable of summoning emergency assistance from local police, fire, or emergency response departments;

    c. portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment; and,

    d. water at adequate volume and pressure to supply fire hose streams for foam equipment.

    e. At a minimum, the Facility shall test and/or check monthly the equipment specified above to assure its proper operation. A record of the monthly inspections shall be kept by the Facility for three years.

I. RECORD KEEPING AND REPORTING

1. The Facility shall comply with all applicable monitoring and record keeping requirements as specified in§ 761.180 for commercial storers. All PCB records, documents, and reports shall be maintained at the Facility, and shall be made available for inspection by authorized EPA representatives. Any modification or correction of the records shall be initialed and dated by the supervisor in charge.

2. The Facility shall maintain an inventory of PCBs and PCB Items in storage. The inventory shall include a description of each PCB Item, the date the PCB Items were taken out of service, and the date Items were shipped off-site for disposal.

3. Records relating to PCB Waste Material Profile Sheet shall be retained by the Facility for five (5) years. These records shall include the following information where applicable:

    a. date of each sample collected;

    b. volume of each sample collected;

    c. the name of the person who collected the sample; and,

    d. the name of the company that analyzed the sample, along with the name of the analyst, the date the sample was analyzed, the method used, and the reported result.

4. For facilities that analyze PCB samples at an onsite laboratory, sample volume records are not required if the remainder of the sample is returned to the onsite stored PCB Item from which the sample was taken, or the remainder of the sample is accumulated with onsite laboratory generated PCB wastes.

5. Following each spill cleanup action, the Facility shall develop and maintain records of the cleanup in accordance with §§ 761.120-135, the PCB Spill Cleanup Policy. These records shall include:

    a. identification of the source of the spill;

    b. estimated or actual date and time of the spill occurrence;

    c. date and time cleanup completed;

    d. description of the spill location;

    e. pre-cleanup sampling data used to establish spill boundaries, if required because of insufficient visible traces, and a description of the sampling methodology used;

    f. amount and type of waste cleanup material generated;

g. description of the solid surfaces cleaned and of the double wash/rinse method used, and if soil is the contaminated media, the depth of soil excavated, and amount of soil removed for disposal;

h. post-cleanup verification sampling information such as a description of the sampling methodology used, the number of samples analyzed, and the analytical data; and,

i. a certification by the appropriate Facility officials stating that the cleanup levels required by EPA were achieved, and that the record is true to the best of his/her knowledge.

J. INSPECTIONS·AND ENTRY

The Facility shall allow the Regional Administrator, or an authorized representative, upon presentation of credentials and other documents as may be required by law to:

a. enter the Facility where PCBs and PCB Items are being handled, or stored after donning necessary personal protective equipment and following facility health and safety policies;

b. have access to and copy, at reasonable times, any records that shall be kept pursuant to the Toxic Substances Control Act (TSCA) PCB regulations;

c. inspect any facilities, equipment practices, or operations required under this approval or the TSCA PCB regulations; and,

d. sample or monitor for the purposes of assuring that the Facility is operating in compliance with the conditions of this approval and the TSCA PCB regulations.

K. INFORMATION REQUESTS

The Facility shall provide to the Regional Administrator (to the attention of the Director, Land, Chemical and Redevelopment Division), within a reasonable time, any relevant information which may be requested to determine whether cause exists for modifying, revoking, reissuing, or terminating this approval, or to determine compliance with this approval. The Facility shall also provide to EPA, upon request, copies of records required to be kept pursuant to the TSCA PCB regulations.

L. TRANSFER OF OWNERSHIP

The Facility shall notify the Regional Administrator (to the attention of the Director, Land, Chemical and Redevelopment Division) at least ninety (90) days before transferring ownership of the Facility. The Facility shall also submit to the Regional Administrator, at least ninety (90) days before such transfer, a notarized affidavit signed by the transferee stating that the transferee shall abide by all provisions of this PCB storage approval. After receiving such notification and affidavit, and other such documents as EPA may require,

EPA may issue an amended Approval, substituting the transferee's name for the Facility name, or EPA may require the transferee to apply for a new PCB commercial storage approval. The transferee shall not operate under the Approval until the Regional Administrator issues an Approval in the transferee's name. The transferor shall maintain financial assurance for the Facility until the transferee's application has been approved and the transferee has demonstrated that it has established financial assurance for closure pursuant to § 761.65(g).

M. EFFECTIVE DATE OF APPROVAL

This approval becomes effective on the date of this letter and expires at midnight on the same day and month five years later. Please re-apply for re-authorization approval at least twelve months before the expiration date of this approval.

N. STATEMENT IN COMPLIANCE WITH 40 CFR 761.65(d)(4)(i)

1. The United States Environmental Protection Agency, Region 6 (EPA) is renewing and modifying a Toxic Substances Control Act (TSCA) Approval issued to Safety-Kleen Systems, Inc., Denton, Texas, to continue to operate a commercial storage for disposal facility for solid and liquid polychlorinated biphenyls (PCB) and PCB Items. Pursuant to 40 C.F.R. 761.65(d)(4)(i), EPA finds that the Facility's application satisfied the criteria at 40 C.F.R. § 761.65(d)(2):

   (i) Safety-Kleen Systems, Inc., Denton, Texas, its principals, and its key employees responsible for the establishment or operation of the commercial storage facility are qualified to engage in the business of commercial storage of PCB waste. This finding is based on EPA's evaluation of key personnel responsible for facility operations and technical qualifications and experience as submitted within the Renewal Application.

   (ii) Safety-Kleen Systems, Inc., Denton, Texas, possesses the capacity to handle the quantity of PCB waste which the facility has estimated will be the maximum quantity of PCB waste that will be handled at any one time at the facility. This finding is based on the information and calculations reviewed in the Renewal Application and also represented in Appendix 4.

   (iii) Safety-Kleen Systems, Inc., Denton, Texas has certified compliance with the storage facility standards in 40 C.F.R. § 761.65(b) as found in the Certification Statements provided in the Renewal Application, Appendix 5.

   (iv) Safety-Kleen Systems, Inc., Denton, Texas has developed a written closure plan for the facility that is deemed acceptable by the Land, Chemicals, and Redevelopment Director under the closure plan standards. This finding is based on EPA's evaluation of Appendix 2 of the Renewal Application, the requirements of which are incorporated into

this Approval.

(v) Safety-Kleen Systems, Inc., Denton, Texas has included in the application for final approval a demonstration of financial responsibility for closure that meets the financial responsibility standards in the form of insurance coverage that is based on closure cost estimates and inflation.

(vi) The Facility's operation of the storage area will not pose an unreasonable risk of injury to health or the environment. This finding is based on EPA's evaluation of the Renewal Application and all applicable regulations at 40 C.F.R. § 761, as set forth in this Approval.

(vii) The environmental compliance history of the applicant, its principals, and its key employees does not constitute a sufficient basis for denial of the application. This finding is based on EPA's evaluation of the information contained in the complete Renewal Application and a review of available compliance data. All available information demonstrates that the Facility is in compliance with its current Approval and the TSCA PCB regulations at 40 C.F.R. Section 761, and that the Facility's compliance history evinces no unwillingness or inability to achieve and maintain compliance with the regulations.

END OF APPROVAL CONDITIONS

APPENDIX 1 – PCB WASTE ANALYSIS PLAN

Safety-Kleen Systems, Inc.
Denton, TX

Appendix VIII
TSCA Commercial PCB Storage Authorization
Operations Plan

1. PCB Waste Analysis Plan

The types of PCB materials accepted for storage and held for transfer operations at the facility are summarized in Table 1. Definitions of the terms used in the table are given. These wastes are regulated under the Toxic Substances Control Act (TSCA).

Table 1: Summary of TSCA Wastes for Storage

PCB TYPE	CLASS	TYPICAL PCB CONCENTRATION (DRY WT)
Oil[1]	Liquid	0-90% (<50 and ≥50ppm PCBs)
Water	Liquid	0-10% (<50 and ≥50ppm PCBs)
Articles & Capacitors	Solid	20% (<50 and ≥50ppm PCBs)
Miscellaneous Solids[2]	Solid	0-10% (<50 and ≥50ppm PCBs)
Soils, Spill Cleanup[3]	Solid, Sludge	< 50% (<50 and ≥50ppm PCBs)

[1]Oil may be, but not limited to dielectric liquid containing PCB and a chlorinated solvent and is hydrocarbon based.
[2]Miscellaneous solids include gloves, protective clothing, debris, etc.
[3]Soils means dirt, earth, rock.

1.1 PCB-Only Wastes:

PCB-only wastes are not hazardous waste under State of Texas or Federal RCRA regulations. These wastes include PCB Liquids, PCB Transformers/Bushings, PCB Debris (PPE, rags, wood, paper, gloves, etc. and empty PCB drums) and PCB Capacitors/Light Ballast.

1.2 Profile Approval Process (PCB-Only Wastes)

PCB only wastes are categorized according to one of the previous waste categories defined in this plan and follow the profile approval process for that category. The profile also requires the generator to certify that the waste is PCB-only as defined below.

Before the Denton facility can approve a PCB waste stream for storage at the facility, (1) a generator shall provide a completed Waste Profile Sheet; (2) Denton shall confirm the waste may be managed at the facility pursuant to the terms of it TSCA commercial PCB storage authorization; and (3) Denton shall confirm the PCB waste shipment corresponds to the waste profile sheet and the accompanying waste manifest. The Central Profile Group and when deemed necessary Denton review the Waste Profile Sheet to determine acceptability of the PCB waste stream at Denton.

1.2.1 PCB Waste Profile Sheet Review

Waste Profile Sheets contain information about the generator, physical and chemical characteristics of the waste, process generating the waste, applicable waste codes, applicable DOT shipping name, and a generator certification that the information provided is accurate. At a minimum, the Waste Profile Sheet must provide the following information:

Generator Information
Generator Address Facility Contact Phone #
Generator EPA ID#
General Information
Generating Process Common Name of Waste Rate of Generation
DOT Shipping Name DOT Hazard Class EPA Waste Codes
Chemical Composition
List of Chemical Constituents and Concentrations
Physical Description
Physical Description Physical State Phases/Layering
% Free Liquid
Regulatory Information
Regulated or Licensed Radioactive Waste
Regulated Medical Waste
Dioxin Listed Waste
TSCA Regulated Waste
Generator Certification
Certification signed, actual or electronic, by the generator that the information supplied on the Waste Profile Sheet and any attachments or supplements represent a complete and accurate description of the waste.

See **Attachment 1A** for an example Waste Material Profile Sheet

1.2.2 Assessment of Denton's Ability to Manage PCB Waste

Following the review of the Waste Profile Sheet by the Central Profiling Group and if necessary, Denton personnel, the Central Profiling Group evaluates whether the waste stream may be managed at the facility pursuant to the TSCA commercial PCB storage authorization. Additionally, the evaluation includes a review of:

-Existing storage facilities and capabilities to ensure that the waste material can be satisfactorily managed by Denton in accordance with this Permit or a permitted off-site facility.
-The physical and chemical characteristics of the waste material to ensure that the material is compatible with other wastes present at the facility.
-The waste characterization information and available analytical data to ensure that the waste material does not contain any specific waste codes, compounds, or properties that are prohibited at Denton.

1.2.3 Decision to Receive PCB Waste Stream

The waste profile decision is recorded electronically in the WINWEB system and includes the Central Profiling Group and if necessary, Denton personnel, issuing the decision with a date/time stamp. Following approval of the PCB waste stream and prior to shipment of the waste, the generator will be notified in writing that the Denton facility has the appropriate permits for and will accept the waste stream. If the waste is approved for management at the Denton facility, a unique identification number (the Profile Number) is assigned to the waste stream.

1.2.4 Review of PCB Waste Profile Approval

The waste profile evaluation is repeated when: (1) a generator notifies Clean Harbors or the Denton facility that the process generating the waste has changed (e.g., when the raw materials to the process have changed), (2) if Denton has reason to suspect that the waste is in non-conformance with profile documentation, or (3) at a minimum, annually.

For an annual waste profile recertification, the generator shall notify of any changes in the waste stream or certify in writing that the waste stream has not changed. After a positive review of the generator's certification, the waste profile will be reauthorized. Or if there are changes in the waste stream which do not result in the waste stream being unacceptable, the waste profile will be updated and approved. If there are changes in the waste stream which result in the waste stream becoming unacceptable, the waste profile approval will be canceled, and the generator notified.

1.2.5 PCB Waste Acceptance

Denton determines the acceptability of the waste based on:

- Agreement between the waste profile, manifest and the load inspection,

- Permit conditions at the facility, which were determined prior to PCB waste shipment, and
- The availability of proper PCB waste management at the facility.

PCB Waste is not officially accepted until the waste has been determined to match the waste profile and the waste manifest and any discrepancies have been adequately resolved and documented.

Discrepancies from PCB Waste Profile
Potential discrepancies for waste shipments include differences in quantity and type between the manifested waste and the waste received. Waste type discrepancies are determined by visual inspection (e.g., container labelling, markings, etc.) and by comparing the manifest of the incoming load to the waste profile information.

Discrepancy in Quantity of PCB Waste
To check for quantity discrepancies, the number of containers is reconciled with the uniform hazardous waste manifest. The number of containers must be correct; there is no tolerance. If discrepancies in the quantity of waste occur, the generator will be contacted by Clean Harbors or the Denton facility to resolve the difference.

Discrepancy in Type of PCB Waste
Changes in the proper shipping name, additional waste codes, etc. are documented in the operating record. If any of these conditions occur, the manifest is considered discrepant, and actions will be taken to reconcile the discrepancy. If discrepancies of waste type occur, one or more of the following actions may be used to resolve the discrepancy:

-A Clean Harbors or Denton facility employee contacts the generator or authorized representative. In cases where the waste is amenable to management at the facility, the discrepancy may be resolved between Denton and the generator, or authorized representative, which may require a new profile for the waste or updating the existing profile. PCB waste that is not amenable to acceptance by Denton is rejected within ten days of receipt to an alternate authorized facility approved by the generator, or if specified it is rejected back to the generator.

Resolution of PCB Waste Discrepancy
The manifest discrepancy resolution between the facility and the generator, or authorized representative, will be noted on the manifest which becomes part of the operating record. If the discrepancy is not resolved within 15 days after receiving the waste, the facility must immediately submit to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

Accepted PCB Wastes, Secondary Containment and Segregation from Incompatible Wastes
Upon acceptance, the waste is placed into storage in Container Storage Area 3, Bay Area B – see **Attachment 1B**. This storage area is the only authorized TSCA commercial PCB storage area onsite and is approved to store 5,000 gallons or the equivalent of 90, 55-gallon drums of PCB wastes. Container Storage Area 3 where Bay Area B is located has a secondary containment capacity of

210,380 gallons. Additionally, 4 secondary containment pallets with a capacity of 535 gallons each are provided in Bay Area B dedicated to PCB waste storage and isolate PCB wastes from other potentially incompatible wastes – see **Attachment 1C**.

PCB wastes can be stored up to 1-year with an additional 1-year extension possible upon approval by EPA in Container Storage Area 3, Bay Area B, however typically PCB wastes are stored for less than 30-days prior to shipment off-site to other approved facilities.

1.3 Load Acceptance, Inspection and Handling of Discrepancies (PCB-Only Wastes)

PCB-only wastes are categorized according to waste profiles and procedures are followed for load acceptance and handling discrepancies as outlined herein. PCB wastes will be identified by review of the manifest/shipping papers, visual inspections, labels on containers, and the Waste Profile Sheet supplied by the generator. If during visual inspection of containers of PCB wastes indications of regulated PCBs are discovered (e.g., container labels, markings, etc.) and the wastes profile did not identify PCBs as a contaminant, a manifest type discrepancy will exist. The generator will be required to resolve the discrepancy. If the explanation indicates that the waste should have been manifested as PCBs, the applicable portions of the 40 CFR §761.216 shall be followed, which include filing an "Unmanifested Waste Report." Also, during the incoming load evaluation:

-Manifest reviews are evaluations and comparison of applicable information to the associated waste profile sheet to include generator name, address and EPA ID number, transporter name and EPA ID number, destinated facility name, address and EPA ID number, hazardous material designation marking, proper DOT shipping description, PCB waste quantity indicated in kilograms, PCB out of service date, etc. See **Attachment 1D** for an example manifest copy.

-All PCB Containers, PCB Article Containers, and PCB Articles not in containers will be marked with the appropriate PCB Mark (if not already marked by the generator) to comply with the marking requirements of 40 CFR §761.40.
-Each PCB container from a shipment will be visually inspected to verify that it is not leaking. If a leaking container of PCB waste is discovered during the inspection, it will be re-packaged or overpacked to prevent further leakage. The spill area will be decontaminated in accordance with 40 CFR § 761 Subpart G. In addition, the transport vehicle bed will be inspected. In the case of flatbeds or vans carrying PCB wastes, water or other free liquid found on the bed will be collected and managed as PCB waste or treated as a PCB spill and cleaned in accordance with 40 CFR § 761 Subpart G.
-The Denton facility conducts storage only for small quantities of PCB wastes in transit for transfer to final approved destination facilities. The facility does not open PCB waste containers for any reason. Consolidation, bulking, and/or co-mingling of PCB wastes are not performed since containers are temporarily stored as received prior to transfer offsite to authorized final destination facilities. Therefore, no sampling and analysis are performed for such unopened containers which includes no "fingerprint analysis".

Significant differences in quantity for batch PCB waste is any variation in piece count, such as a discrepancy of one PCB Transformer or PCB Container or PCB Article Container in a truckload. Significant differences in type are obvious differences which can be discovered by inspection such as the substitution of solids for liquids or the substitution of high concentration PCBs (above 500 ppm) with lower concentration materials as noted by comparing inspection results (e.g., container labeling, marking, etc.), the manifest and the associated waste profile sheet.

Upon discovering a significant difference in quantity or type, the owner or operator must attempt to reconcile the discrepancy with the waste generator or transporter (e.g., with telephone conversations). If the discrepancy is not resolved within 15 days after receiving the waste, the owner or operator must immediately submit to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

Upon rejecting the PCB waste, the facility must consult with the generator prior to forwarding the waste to another facility that can manage the waste. If it is impossible to locate an alternative facility that can receive the waste, the facility may return the rejected waste to the generator. The facility must send the waste to the alternative facility or to the generator within 60 days of the rejection identification.

1.4 Recordkeeping

1.4.1 Annual Records

The facility must maintain the following:

(A) All signed manifests generated or received at the facility during the calendar year.
(B) All Certificates of Disposal that have been generated or received by the facility during the calendar year.
(C) Records of inspections and cleanups performed in accordance with § 761.65(c)(5).

1.4.2 Written Annual Document Log

The facility must prepare the following log on an annual basis:

(A) The name, address, and EPA identification number of the storage facility covered by the annual document log and the calendar year covered by the annual document log.
(B) For each manifest generated or received by the facility during the calendar year, the unique manifest number and the name and address of the facility that generated the manifest and the following information:
(1) The serial number or other means of identifying each PCB Article, not in a PCB Container or PCB Article Container, the weight in kilograms of the PCB waste in the PCB Article, the date it was removed from service for disposal, the date it was received at the facility, the date it was placed in transport for off-site disposal (if applicable), and the date of disposal (if known).

(2) The unique number assigned by the generator identifying each PCB Container, a description of the contents of each PCB Container, such as liquid, soil, cleanup debris, etc., including the total weight of the PCB waste in kilograms in each PCB Container, the first date PCB waste placed in each PCB Container was removed from service for disposal, the date it was received at the facility, the date each PCB Container was placed in transport for off-site storage or disposal (as applicable), and the date the PCB Container was disposed of (if known).
(3) The unique number assigned by the generator identifying each PCB Article Container, a description of the contents of each PCB Article Container, such as pipes, capacitors, electric motors, pumps, etc., including the total weight in kilograms of the PCB waste in each PCB Article Container, the first date a PCB Article placed in each PCB Article Container was removed from service for disposal, the date it was received at the facility, the date each PCB Article Container was placed in transport for off-site storage or disposal (as applicable), and the date the PCB Article Container was disposed of (if known).

1.4.3 Annual Report

The facility shall submit an annual report using EPA Form 6200-025 (see **Attachment 1E**), which briefly summarizes the records and annual document log by July 15 of each year. The annual report shall contain no confidential business information. The annual report shall consist of the information listed below:
(A) The name, address, and EPA identification number of the facility covered by the annual report for the calendar year.
(B) The total weight in kilograms of PCB waste in PCB Large High or Low Voltage Capacitors, PCB waste in PCB Article Containers, PCB waste in PCB Transformers, bulk PCB waste, PCB waste in PCB Containers, and other PCB waste in storage at the facility at the beginning of the calendar year, received or generated at the facility, transferred to another facility, or disposed of at the facility during the calendar year. The information must be provided for each of these categories, as appropriate.
(C) The total number of PCB Transformers, the total number of PCB Large High or Low Voltage Capacitors, the total number of PCB Article Containers, and the total number of PCB Containers in storage at the facility at the beginning of the calendar year, received or generated at the facility, transferred to another facility, or disposed of at the facility during the calendar year. The information must be provided for each of these categories, as appropriate.
(D) The total weight in kilograms of each of the following PCB categories: PCB waste in PCB Large High or Low Voltage Capacitors, PCB waste in PCB Article Containers, PCB waste in PCB Transformers, bulk PCB waste, PCB waste in PCB Containers, and other PCB waste remaining in storage for disposal at the facility at the end of the calendar year
(E) The total number of PCB Transformers, the total number of PCB Large High or Low Voltage Capacitors, the total number of PCB Article Containers, and the total number of PCB Containers remaining in storage for disposal at the facility at the end of the calendar year.
(F) The requirement to submit annual reports to the Regional Administrator continues until the submission of the annual report for the calendar year during which the facility ceases PCB storage or disposal operations. Storage operations have not ceased until all PCB waste, including any PCB waste generated during closure, has been removed from the facility.

All records referenced herein must be maintained by the facility for a minimum of 3 years.

2. PCB Training Plan

See **Attachment 2**.

3. Safety Plan

See **Attachment 3**.

4. Contingency Plan

See **Attachment 4**.

Attachment 1A

WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No.

A. GENERAL INFORMATION

GENERATOR EPA-ID:

GENERATOR PROFILE No.

GENERATOR CODE (Assigned by Clean Harbors)

GENERATOR NAME:

ADDRESS

CITY STATE ZIP/POSTAL CODE

PHONE:

CUSTOMER CODE (Assigned by Clean Harbors)

CUSTOMER NAME:

ADDRESS

CITY STATE/PROVINCE ZIP/POSTAL CODE

B. WASTE DESCRIPTION

WASTE DESCRIPTION:

PROCESS GENERATING WASTE (Please provide detailed description of process generating waste):

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE
- SOLID WITHOUT FREE LIQUID
- POWDER
- MONOLITHIC SOLID
- LIQUID WITH NO SOLIDS
- LIQUID/SOLID MIXTURE
  - % FREE LIQUID
  - % SETTLED SOLID
  - % TOTAL SUSPENDED SOLID
- SLUDGE
- GAS/AEROSOL

NUMBER OF PHASES/LAYERS

1 2 3

% BY VOLUME (Approx.)

TOP

MIDDLE

BOTTOM

VISCOSITY (If liquid present)
- 1 - 100 (e.g. WATER)
- 101 - 500 (e.g. MOTOR OIL)
- 501 - 10,000 (e.g. MOLASSES)
- > 10,000

COLOR

ODOR
- NONE
- MILD
- STRONG

Describe:

BOILING POINT °F (°C)
- <= 95 (<=35)
- 95 - 100 (35-38)
- 101 - 129 (38-54)
- >= 130 (>54)

MELTING POINT °F (°C)
- < 140 (<60)
- 140-200 (60-93)
- > 200 (>93)

TOTAL ORGANIC CARBON
- <= 1%
- 1-9%
- >= 10%

FLASH POINT °F (°C)
- < 73 (<23)
- 73 - 100 (23-38)
- 101 -140 (38-60)
- 141 -200 (60-93)
- > 200 (>93)

Actual:

pH
- <= 2
- 2.1 - 6.9
- 7 (Neutral)
- 7.1 - 12.4
- >= 12.5

Actual:

SPECIFIC GRAVITY
- < 0.8 (e.g. Gasoline)
- 0.8-1.0 (e.g. Ethanol)
- 1.0 (e.g. Water)
- 1.0-1.2 (e.g. Antifreeze)
- > 1.2 (e.g. Methylene Chloride)

ASH
- < 0.1
- 0.1 - 1.0
- 1.1 - 5.0
- 5.1 - 20.0
- > 20
- Unknown

Actual:

BTU/LB (MJ/kg)
- < 2,000 (<4.6)
- 2,000-5,000 (4.6-11.6)
- 5,000-10,000 (11.6-23.2)
- > 10,000 (>23.2)

Actual:

VAPOR PRESSURE (for liquids only) mm Hg

D. COMPOSITION (List the complete composition of the waste, include any inert components and /or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN -- MAX	UOM	CHEMICAL	MIN -- MAX	UOM

ANY METAL OBJECTs PRESENT? YES NO

If yes include dimension:

CleanHarbors ENVIRONMENTAL SERVICES, INC.

Clean Harbors Profile No.

E. CONSTITUENTS -- Are these values based on testing or knowledge? ☐ Knowledge ☐ Testing

If constituent concentrations are base on analytical testing, analysis must be provided. If based on knowledge, basis of knowledge must be provided below.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D004	ARSENIC	5.0		
D005	BARIUM	100.0		
D006	CADMIUM	1.0		
D007	CHROMIUM	5.0		
D008	LEAD	5.0		
D009	MERCURY	0.2		
D010	SELENIUM	1.0		
D011	SILVER	5.0		

RCRA	VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D018	BENZENE	0.5		
D019	CARBON TETRACHLORIDE	0.5		
D021	CHLOROBENZENE	100.0		
D022	CHLOROFORM	6.0		
D028	1,2-DICHLOROETHANE	0.5		
D029	1,1-DICHLOROETHYLENE	0.7		
D035	METHYL ETHYL KETONE	200.0		
D039	TETRACHLOROETHYLENE	0.7		
D040	TRICHLOROETHYLENE	0.5		
D043	VINYL CHLORIDE	0.2		

RCRA	SEMI-VOLATILE COMPOUND	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D023	o-CRESOL	200.0		
D024	m-CRESOL	200.0		
D025	p-CRESOL	200.0		
D026	CRESOL (TOTAL)	200.0		
D027	1,4-DICHLOROBENZENE	7.5		
D030	2,4-DINITROTOLUENE	0.13		
D032	HEXACHLOROBENZENE	0.13		
D033	HEXACHLOROBUTADIENE	0.5		
D034	HEXACHLOROETHANE	3.0		
D036	NITROBENZENE	2.0		
D037	PENTACHLOROPHENOL	100.0		
D038	PYRIDINE	5.0		
D041	2,4,5-TRICHLOROPHENOL	400.0		
D042	2,4,6-TRICHLOROPHENOL	2.0		

RCRA	PESTICIDES AND HERBICIDES	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D012	ENDRIN	0.02		
D013	LINDANE	0.4		
D014	METHOXYCHLOR	10.0		
D015	TOXAPHENE	0.5		
D016	2,4-D	10.0		
D017	2,4,5-TP (SILVEX)	1.0		
D020	CHLORDANE	0.03		
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008		

OTHER METALS	MIN	MAX	UOM
ALUMINUM			
ANTIMONY			
BERYLLIUM			
CALCIUM			
COPPER			
MAGNESIUM			
MOLYBDENUM			
NICKEL			
POTASSIUM			
SILICON			
SODIUM			
THALLIUM			
TIN			
VANADIUM			
ZINC			

NON-METALS	MIN	MAX	UOM
BROMINE			
CHLORINE			
FLUORINE			
IODINE			
SULFUR			

OTHER NON-METALS	MIN	MAX	UOM
AMMONIA			
REACTIVE SULFIDE			
CYANIDE-TOTAL			
CYANIDE AMENABLE			
CYANIDE REACTIVE			

OTHER CHEMICALS	MIN	MAX	UOM
PHENOL			
Total Petroleum Hydrocarbons			

OTHER

HOCs

☐ NONE
☐ < 1000 PPM
☐ >= 1000 PPM

PCBs

☐ NONE
☐ <50 PPM
☐ >= 50 PPM

IF PCBS ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

☐ YES ☐ NO

ADDITIONAL HAZARD

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

☐ YES ☐ NO (If yes, explain)

☐ ASBESTOS	☐ INFECTIOUS, PATHOGENIC, OR ETIOLOGICAL AGENT	☐ REDUCING AGENT
☐ DEA REGULATED SUBSTANCES	☐ OXIDIZER	☐ SHOCK SENSITIVE
☐ DIOXIN	☐ OSHA REGULATED CARCINOGENS	☐ SPONTANEOUSLY IGNITES WITH AIR
☐ EXPLOSIVE	☐ PESTICIDE	☐ THERMALLY SENSITIVE
☐ HERBICIDE	☐ POLYMERIZABLE	☐ WATER REACTIVE
☐ FUMING / SMOKING WASTE	☐ RADIOACTIVE	
☐ NONE OF THE ABOVE		

CleanHarbors ENVIRONMENTAL SERVICES, INC.

Clean Harbors Profile No.

F. REGULATORY STATUS

YES NO USEPA HAZARDOUS WASTE?

YES NO DO ANY STATE WASTE CODES APPLY?

YES NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
LDR CATEGORY:
VARIANCE INFO:

YES NO IS THIS A UNIVERSAL WASTE?

YES NO IS THIS A WASTEWATER PER 40 CFR PART 268.2?

YES NO IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D0011, D012-DO17 NON-WASTEWATERS, OR D018- D043 APPLY, ARE ANY UNDERLYING HAZARDOUS (UHCs) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?

YES NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES NO IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?
IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401.

YES NO IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES?
IF YES, IS THE GENERATOR'S TOTAL ANNUAL BENZENE >= 10 Megagrams? YES NO

YES NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2PSIA)?

YES NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES NO IS THIS WASTE REGULATED UNDER THE OZONE DEPLETING SUBSTANCE ACT FOR ONTARIO?

G. D.O.T INFORMATION: (Include proper shipping name, hazard class and ID number).
US D.O.T. DESCRIPTION:

H. TRANSPORTATION REQUIREMENTS
ESTIMATED SHIPMENT FREQUENCY: ONE TIME WEEKLY MONTHLY QUARTERLY YEARLY OTHER

IF BULK LIQUID OR BULK SOLID PLEASE INDICATE THE EXPECTED NUMBER OF LOADS PER SHIPPING FREQUENCY:

CONTAINERIZED
CONTAINERS/SHIPMENT
STORAGE CAPACITY:
CONTAINER TYPE:
CUBIC YARD BOX
PALLET
TOTE TANK
OTHER:
DRUM SIZE:
CONTAINER MATERIAL:
STEEL
FIBER
PLASTIC
OTHER

BULK LIQUID
GALLONS/SHIPMENT: GAL.
FROM TANKS: TANK SIZE GAL.
FROM DRUMS
VEHICLE TYPE:
VAC TRUCK
TANK TRUCK
RAILROAD TANK CAR
CHECK COMPATIBLE STORAGE MATERIALS.
STEEL | STAINLESS STEEL
RUBBER LINED | FIBERGLASS LINED
DERAKANE
OTHER

BULK SOLID
SHIPMENT UOM: TON YARD
PER SHIPMENT: MIN MAX
STORAGE CAPACITY TON/YD
VEHICLE TYPE:
DUMP TRAILER
ROLL OFF BOX
INTERMODAL ROLLOFF BOX
CUSCO/VACTOR
OTHER

I. SPECIAL REQUEST
SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS:
SPECIAL WASTE HANDLING REQUIREMENTS:
OTHER COMMENTS OR REQUESTS:

J. BIENNIAL / ANNUAL REPORTING INFORMATION

SIC CODE	SOURCE CODE	FORM CODE

K. SAMPLE STATUS

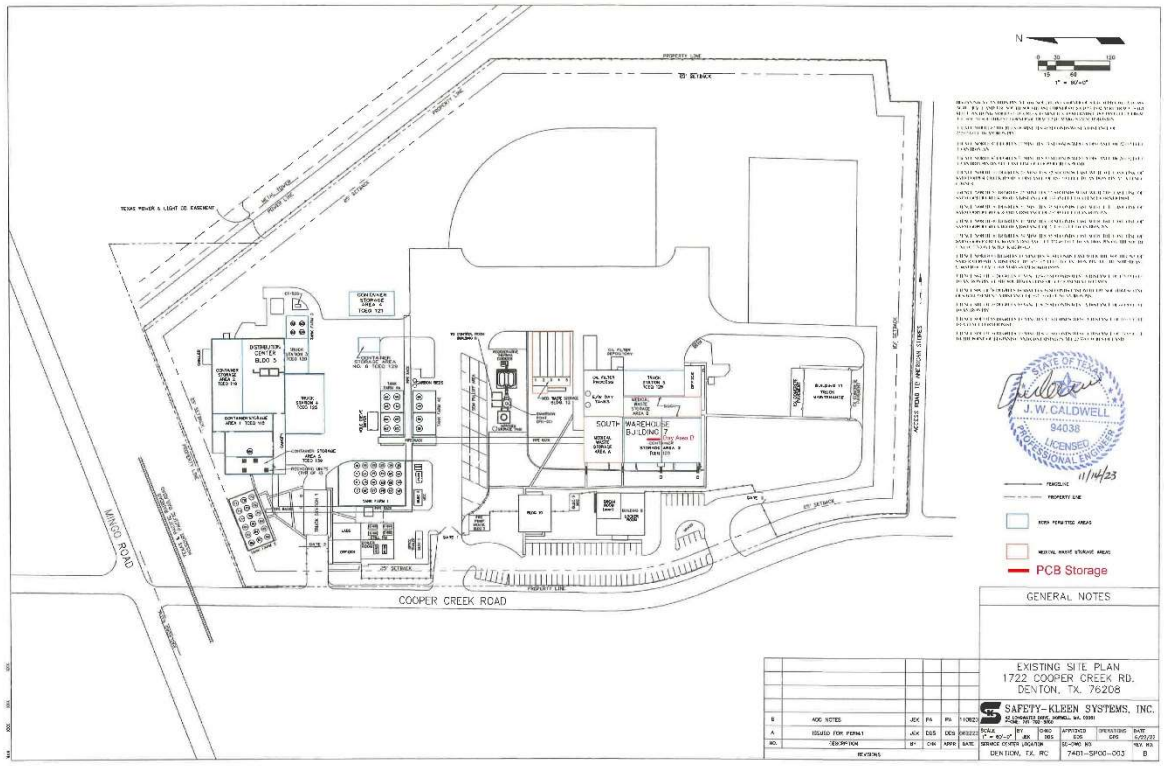
REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED.	YES / NO	SAMPLED BY	DATE SAMPLED	WHERE SENT

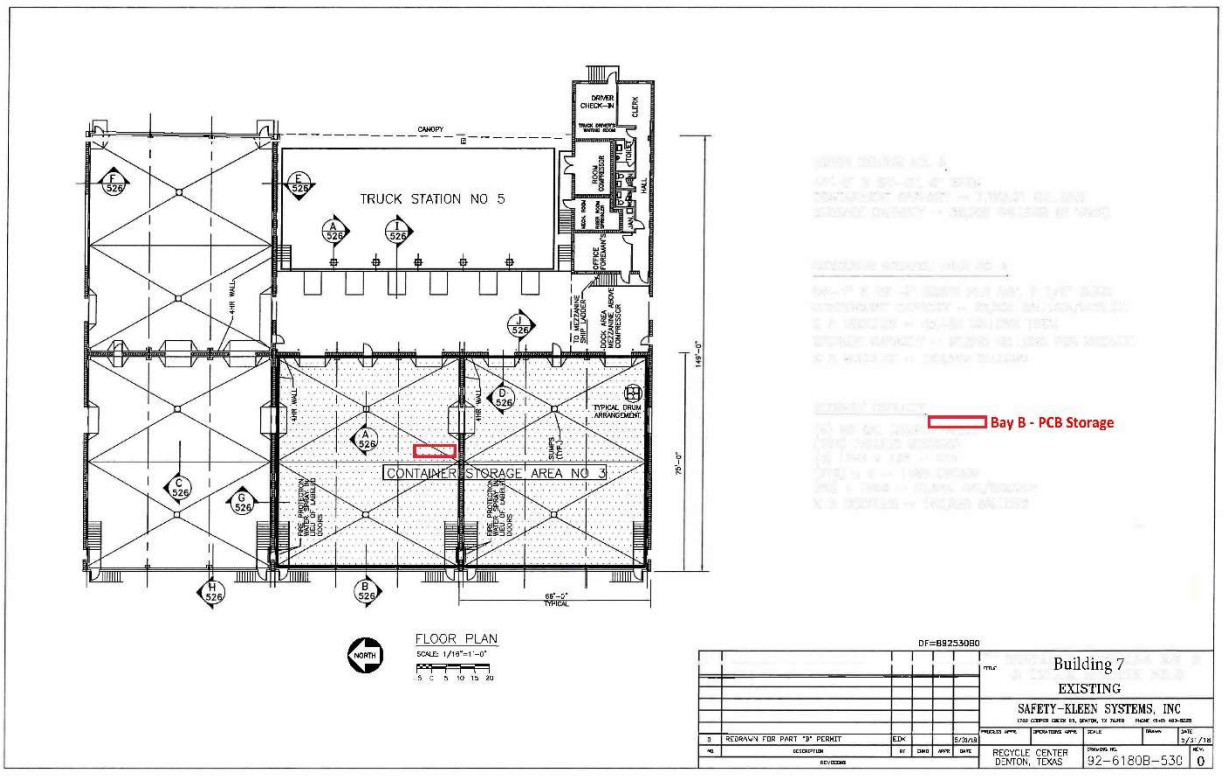
GENERATORS CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE	NAME (PRINT)	TITLE	DATE

Attachment 1B


N
PROPERTY LINE
10' SETBACK
MINCO ROAD
COOPER CREEK ROAD
SOUTH WAREHOUSE BUILDING 7
PCB Storage
GENERAL NOTES
EXISTING SITE PLAN
1722 COOPER CREEK RD.
DENTON, TX. 76208
SAFETY-KLEEN SYSTEMS, INC.
DENTON, TX. RC
7401-SP00-003


TRUCK STATION NO 5
CANOPY
CONTAINER STORAGE AREA NO 3
TYPICAL DRUM ARRANGEMENT
Bay B - PCB Storage
FLOOR PLAN
SCALE: 1/16"=1'-0"
NORTH
Building 7
EXISTING
SAFETY-KLEEN SYSTEMS, INC
RECYCLE CENTER
DENTON, TEXAS
92-6180B-530

Attachment 1C

INTERSTATE PRODUCTS, INC.

"Your Road to Quality Environmental Products Since 1996"

https://store.interstateproducts.com 1-800-474-7294

Key Features:

- Use for intermediate bulk containers (IBCs), drums, or other large vessels. (all materials stored must be chemically
- Heavy duty construction can handle up to 8,000 lbs. per side (UDL).
- Available with optional Bucket Shelf for either or both sides - catches small leaks or spills during dispensing.
- 1144 Grates are easily removed for quick clean up.
- One continuous sump holds 535 gallons - meets EPA Spill Containment and SPCC Regulations for two IBC tanks.

Compliance:

- Meets SPCC and EPA Container Storage Regulation 40 CFR 264.175 Spill Containment Regulations.

Warranty:

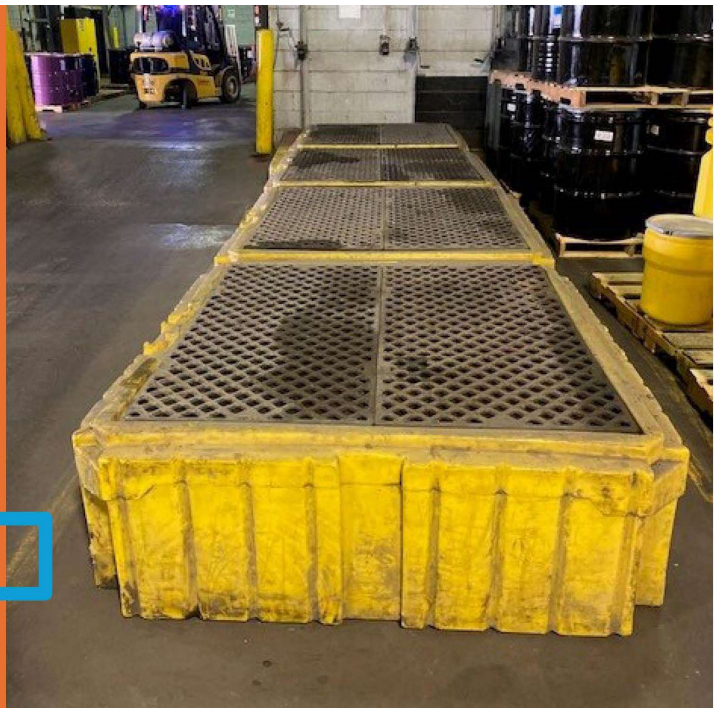
- Protected by the industry's strongest warranty - Five (5) years against any material or workmanship defects.

Ultratech Twin IBC Pallet 1144 Specifications:

Dimensions: 124 1/2" x 61 5/8" x 22"
Uniformly Distributed Load: 8,000 lbs per side
Containment Capacity: 535 Gallons
Weight: 353 lbs.
Contact IPI today for help on the 1144 Twin Tote & IBC Spill Pallet and other Ultratech products.

Interstate Products Inc. 1-800-474-7294 services@interstateproducts.com

Container Storage Area 3, Bay Area B – PCB Storage



Attachment 1D

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number | 2. Page 1 of | 3. Emergency Response Phone | **4. Manifest Tracking Number**

GENERATOR

5. Generator's Name and Mailing Address | Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name | U.S. EPA ID Number

7. Transporter 2 Company Name | U.S. EPA ID Number

8. Designated Facility Name and Site Address | U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.					
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name | Signature | Month | Day | Year

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name | Signature | Month | Day | Year

Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) | U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name | Signature | Month | Day | Year

VOID

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete.

DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

Attachment 1E

	United States Environmental Protection Agency **PCB ANNUAL REPORT FORM** **40 CFR 761.180(b)(3)**	EPA Form # 6200-025

1. Submitter Information

Name: _____ **Job Title:** _____
Phone Number: _____ **Email Address:** _____

2. Facility EPA ID Number

EPA ID Number: _____

3. Facility Name and Address

Facility Name: _____
Street Address: _____
City: _____ **State:** _____ **Zip Code:** _____

4. Reporting Calendar Year

Calendar Year: _____

5. Facility Type

☐ Commercial Storer ☐ Disposer ☐ Both

6. Technology Type (check all that apply)

☐ Incinerator
☐ Chemical Waste Landfill
☐ Scrap Metal Recovery Oven
☐ PCB Electrical Cable Processing for Metal Recovery
☐ Pipeline and Compressor Systems Decontamination
☐ Chemical Dechlorination
☐ High Efficiency Boiler
☐ Fluorescent Light Ballast Recycler
☐ PCB Transformer Decommissioning
☐ Other _____

7. PCB Waste in Storage at the Beginning of the Calendar Year

	Large Low and High Voltage Capacitors	Article Containers	Transformers	Bulk	Containers	Other
Weight (kg)						
Total Number				N/A		

8. PCB Waste Received and Generated During the Calendar Year

(1)	Large Low and High Voltage Capacitors		Article Containers		Transformers	
	Received	Generated	Received	Generated	Received	Generated
Weight (kg)						
Total Number						

8. PCB Waste Received and Generated During the Calendar Year

(2)	Bulk		Containers		Other	
	Received	Generated	Received	Generated	Received	Generated
Weight (kg)						
Total Number	N/A	N/A				

9. PCB Waste Transferred to Another Facility During the Calendar Year

	Large Low Voltage Capacitors	Article Containers	Transformers	Bulk	Containers	Other
Weight (kg)						
Total Number				N/A		

10. PCB Waste Disposed of at the Facility During the Calendar Year

	Large Low Voltage Capacitors	Article Containers	Transformers	Bulk	Containers	Other
Weight (kg)						
Total Number				N/A		

11. PCB Waste in Storage at the Facility at the end of the Calendar Year

	Large Low Voltage Capacitors	Article Containers	Transformers	Bulk	Containers	Other
Weight (kg)						
Total Number				N/A		

12. Number of Manifests Sent/Received

Number of Incoming Manifests: _____

Number of Outgoing Manifests: _____

Total Number of Manifests: _____

Paperwork Reduction Act Notice

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control Number: 2050-0230). Responses to this collection of information are mandatory under 40 CFR 761.180(b)(3). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 7.6 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden to the Regulatory Support Branch Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

INSTRUCTIONS FOR FILLING OUT THE PCB ANNUAL REPORT FORM

Who Must Use this Form

Owners or operators of facilities who dispose of or commercially store PCB waste are required to submit a PCB Annual Report for that calendar year (40 CFR 761.180(b)(3)). Owners or operators of facilities who dispose of or commercially store PCB waste are required to use this form to submit the information.

Purpose of this Form

This form is made available to ease the PCB Annual Report process for owners and operators of facilities who dispose of or commercially store PCB waste. Such facilities are required to submit information on PCB waste in storage at the beginning of the calendar year, received, generated, transferred, and disposed during the calendar year, and in storage at the end of the calendar year. For more information on the reporting requirements, please refer to 40 CFR 761.180.

Where to Send this Form

Owners or operators of facilities who dispose of or commercially store PCB waste should print the completed form, and any applicable attachments, and mail or email it to the address listed below.

Document Control Officer
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W. MC 5303T
Washington, D.C., 20460-0001
OR
ORCRPCBs@epa.gov

How to Fill out this Form

Please pay attention to the following notes when completing this form:

- Please fill out all sections of the form, even if they are not applicable to your facility. For example, if your facility did not dispose of any PCB waste, enter "0" for all items in section number 10 instead of leaving those fields blank. Please note that negative values are not valid.
- Enter both received and generated values for Item 8, not one combined value.
- Refer to **Attachment A** for definitions of PCB waste categories.

If you have any questions regarding this form, please contact your EPA Regional Coordinator or EPA Headquarters. https://www.epa.gov/pcbs/program-contacts.

ATTACHMENT A
Select Definitions of PCB Waste

Large high voltage capacitor means a capacitor which contains 1.36 kg (3 lbs.) or more of dielectric fluid and which operates at 2,000 volts (AC or DC.) or above.

Large low voltage capacitor means a capacitor which contains 1.36 kg (3 lbs.) or more of dielectric fluid and which operates below 2,000 volts (AC or DC).

PCB Article Container means any package, can, bottle, bag, barrel, drum, tank, or other device used to contain **PCB Articles** or **PCB Equipment**, and whose surface(s) has not been in direct contact with PCBs.

PCB Article means any manufactured article, other than a PCB Container, that contains PCBs and whose surface(s) has been in direct contact with PCBs. "PCB Article" includes capacitors, transformers, electric motors, pumps, pipes and any other manufactured item (1) which is formed to a specific shape or design during manufacture, (2) which has end use function(s) dependent in whole or in part upon its shape or design during end use, and (3) which has either no change of chemical composition during its end use or only those changes of composition which have no commercial purpose separate from that of the PCB Article.

PCB Equipment means any manufactured item, other than a PCB Container or a PCB Article Container, which contains a PCB Article or other PCB Equipment, and includes microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures.

PCB Transformer means any transformer that contains ≥500 ppm PCBs. For PCB concentration assumptions applicable to transformers containing 1.36 kilograms (3 lbs.) or more of fluid other than mineral oil, see § 761.2. For provisions permitting reclassification of electrical equipment, including PCB Transformers, containing ≥500 ppm PCBs to PCB-Contaminated Electrical Equipment, see § 761.30(a) and (h).

Bulk PCB Waste means waste that is classified as either PCB Remediation Waste or PCB Bulk Product Waste (see those definitions below).

PCB Bulk Product Waste means waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration where the concentration at the time of designation for disposal was ≥50 ppm PCBs. PCB bulk product waste does not include PCBs or PCB Items regulated for disposal under §§ 761.60(a) through (c), 761.61, 761.63, or 761.64. PCB bulk product waste includes, but is not limited to:

(1) Non-liquid bulk wastes or debris from the demolition of buildings and other manmade structures manufactured, coated, or serviced with PCBs. PCB bulk product waste does not include debris from the demolition of buildings or other man-made structures that is contaminated by spills from regulated PCBs which have not been disposed of, decontaminated, or otherwise cleaned up in accordance with subpart D of this part.

(2) PCB-containing wastes from the shredding of automobiles, household appliances, or industrial appliances.

(3) Plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); preformed or molded rubber parts and components; applied dried paints, varnishes, waxes or other similar coatings or sealants; caulking; adhesives; paper; Galbestos; sound deadening or other types of insulation; and felt or fabric products such as gaskets.

(4) Fluorescent light ballasts containing PCBs in the potting material.

PCB Container means any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.

PCB Remediation Waste means waste containing PCBs as a result of a spill, release, or other unauthorized disposal, at the following concentrations:

- Materials disposed of prior to April 18, 1978, that are currently at concentrations ≥ 50 ppm PCBs, regardless of the concentration of the original spill;
- Materials which are currently at any volume or concentration where the original source was ≥ 500 ppm PCBs beginning on April 18, 1978, or ≥ 50 ppm PCBs beginning on July 2, 1979; and
- Materials which are currently at any concentration if the PCBs are spilled or released from a source not authorized for use under this part.

PCB remediation waste means soil, rags, and other debris generated as a result of any PCB spill cleanup, including, but not limited to:

1) Environmental media containing PCBs, such as soil and gravel; dredged materials, such as sediments, settled sediment fines, and aqueous decantate from sediment.
2) Sewage sludge containing < 50 ppm PCBs and not in use according to § 761.20(a)(4); PCB sewage sludge; commercial or industrial sludge contaminated as the result of a spill of PCBs including sludges located in or removed from any pollution control device; aqueous decantate from an industrial sludge.
3) Buildings and other man-made structures (such as concrete floors, wood floors, or walls contaminated from a leaking PCB or PCB-Contaminated Transformer), porous surfaces, and non-porous surfaces.

Other Waste Category should be utilized for wastes that cannot be classified as: Large Low or High Voltage Capacitor, Article Container, Transformer, Bulk waste, or Container. Examples of "Other" waste includes small capacitors, circuit breakers, PCB-contaminated transformers (<500 ppm), and pipeline.

APPENDIX 2 - CLOSURE PLAN

8.0 CLOSURE PLAN

8.1 Closure Plans

This facility operates as a repackaging, consolidation, transfer, and storage facility for off-site generated hazardous and non-hazardous wastes, as well as a storage facility for PCBs. The facility will handle PCBs in Bay Area B, Container Storage Area 3. PCBs will not be stored in other areas of the facility. This closure plan covers the closure of PCB contaminated wastes which will be stored in Bay Area B, Container Storage Area 3.

8.2 CLOSURE PERFORMANCE STANDARD

When the facility closes, all PCB-containing wastes will be removed from the operating units at the site and manifest4ed to permitted disposal facilities. As described later in this section, all areas in which PCB-containing materials were stored, and all equipment, will be decontaminated to meet the closure performance standard.

These measures will eliminate post-closure escape of hazardous materials from current operations to the ground or surface waters or to the atmosphere by removing any potential source.

The presence of the containment system described in section 6.2 virtually eliminates the possibility of releases to site soils; consequently, sampling is not being proposed. If, in the future, soil sampling is deemed necessary, it will be performed sand the closure plan will be modified in accordance with section 8.9 of this application.

Partial closure is not anticipated, however, any single unit or structure of the facility may be closed independently.

8.2.1 Inventory Removal and Disposal

Upon closure, all PCB-containing materials will be manifested to permitted destinations. Only DOT approved containers, or non-leaking PCB unit's legal for shipment will be accepted on site. Any material transferred to any other container will only be transferred to DOT approved containers. Removal and transportation of the stored materials will not present any extraordinary activities. All waste received at the site will have necessary permits obtained prior to removal off-site to ultimate disposal facilities. Only approved disposal sites will be used. Incinerators must meet the requirements set by 40 CFR part 761.75(a).

8.2.2 Closure of Containers

It is standard operating procedure at the facility that no PCB-containing material be re-containerized unless the situation arises in which the original container develops a leak or in the event that materials are generated on site from decontamination activities. If, however, containers with residual PCBs are present at the site upon initiation of closure,

they will be appropriately disposed as PCB waste or decontaminated using the procedures outlined below.

All equipment used in the handling and/or decontamination of PCB containers will be decontaminated in accordance with 40 CFR Part 761 which might include washing with an appropriate solvent (e.g. kerosene or diesel fuel), high-pressure steam-cleaned, and triple-rinsed to remove all residual PCBs if that is demonstrated to be an effective method. All decontamination wastes containing PCBs will be properly disposed per TSCA requirements. All disposable equipment used in the handling and decontamination of drums will be properly disposed per TSCA requirements.

8.3 DECONTAMINATION AND/OR DISPOSAL OF STRUCTURES, EQUIPMENT AND OTHER MATERIALS

8.3.1 Extent of Contamination

After removal of all PCB waste inventories from the PCB storage areas and proper disposal of those wastes, the site manager will inspect the storage areas. Any dist or other debris will be collected and properly disposed of as PCB waste. All walls, floors, sumps, and equipment in the areas where PCBs were stored, processed, or sampled (all storage, processing, and sampling will occur in the three designated areas only) will be visually inspected. A grid will be laid out on the concrete floor of each PCB area and bulk samples taken per 40 CFR 761 subpart N. Additionally, any indicators of potential contamination found during the visual inspection, such as stains or discoloration will be sampled. Any cracks or seams in the floor will also be sampled. Concrete and all porous surfaces will be sampled using bulk sampling and non-porous surfaces will be sampled using wipe sampling techniques. All sampling and analysis will be conducted in accordance with appropriate EPA methods.

8.3.2 Decontamination of Structures

Upon closure of Bay Area B, Container Storage Area 3, the floors, sumps and walls will be tested for the presence of PCBs as outlined above. If PCB contamination is found to exceed the cleanup standard for "low occupancy areas" in 40 CFR 761(a)(4)(i)(B)(1) in any area, the affected area will be washed with kerosene or other appropriate solvent followed by procedures stipulated in 40 CFR 761.79 as needed. The rinse water will be collected and tested for SW 846 Method 8082 constituents. If results demonstrate PCBs are at undetectable levels, the area will be considered clean. All water generated during decontamination having a PCB concentration exceeding decontamination standards in 40 CFR 761.79(b)(1) will be properly disposed as a PCB waste at approved and permitted facilities. The cleaning solvents will be collected and reused while the PCB level in the solvent is less than 50 ppm. Cleaning solvent which contains PCBs at a concentration greater than the level in 40 CFR 761.79(b)(2) will be containerized in approved drums and disposed at a permitted facility per 40 CFR 761.61(b).

8.3.3 Decontamination of Equipment

All equipment used in the PCB closure operations will be decontaminated in a manner

similar to that used for structures. Appropriate solvent (e.g. kerosene) will be used to wash each piece of equipment, thoroughly removing all oil, grease, and loose debris. The equipment will then be steam cleaned with a high-pressure washer, and triple rinsed. Rinsate will be collected for testing and proper disposal, as described in section 8.3.2 above. Nonexpendable equipment, once decontaminated, will be transferred to another facility approved for the management of PCBs.

8.3.4 Disposal

All disposable items used in PCB closure and/or decontamination operations, such as gloves, clothing, respirators, and hand tools will be placed in appropriate shipping containers for disposal as PCB waste. All drums will be manifested, sealed, and labeled per state, EPA, and DOT guidelines for transport to an EPA permitted TSDF facility (or one with interim status) for final disposition (i.e., secure landfill, incineration, etc). Drums containing material with greater than 500 ppm PCBs will be sent to a permitted high-temperature incinerator, while those containing material with 50-500 ppm PCB will be sent to a high-temperature incinerator (liquids or solids) or a chemical waste landfill (solids only). As previously indicated, only those incinerators that meet the requirements of 40 CFR 761.70(a), and chemical waste landfills that meet the requirements established in 40 CFR 761.75(a), will be used. Drums of material that contain less than 50 ppm PCBs will be properly disposed in a municipal landfill or a chemical secure landfill.

8.4 SITE MONITORING

The presence of the secondary containment structures (curbs, sloped floors, sumps, etc.) virtually eliminate the potential for releases to soils, groundwater or surface water from current and proposed operating units. Therefore, a groundwater monitoring program pertinent to these units is unnecessary.

8.5 SCHEDULE OF CLOSURE

The expected life of the facility has not been determined but is estimated to be at least 30 years more. Thus, the year of closure is estimated to be the year 2054. When the facility is to be closed, a period of 180 days will be required to properly close this site. The schedule of closure events and time necessary for completion of these events is as follows:

If the facility is to be closed, a period of 180 days will be required to properly close the site. The schedule of closure events and time necessary for completion of these events is provided below in Table 1.

Table 1 Schedule of Closure Activities	
Days	**Container Storage Closure Milestones**
60 days before	Notify Regional Administrator of Commencement of Closure Activities.
30 days before	Review closure plan with facility personnel. Container Storage Closure Milestones.
Day 0	Stop accepting wastes. Begin physical inventory and preparation of shipping documents and approval requests to disposal facilities. Continue removing wastes already scheduled for disposal. Stop accepting wastes. Begin physical inventory and preparation of shipping documents and approval requests to disposal facilities. Continue removing wastes already scheduled for disposal.
Day 60	Complete preparation of all manifests and approval requests.
Day 90	Complete removal of all wastes from site. Begin physical cleanup and decontamination of facility.
Day 120	Complete disposal information to original generators.
Day 140	Collection and Analyses of Samples and Disposal of Decontamination ResiduesComplete physical cleanup and decontamination of facility no later than this date. Perform sampling for confirmation no later than this date. Begin removing equipment when cleanup is complete.
Day 150	Complete physical cleanup and decontamination of facility no later than this date. Perform sampling for confirmation no later than this date. Begin removing equipment when cleanup is complete. Complete removing equipment from facility. Independent engineer inspects facility, reviews sample results, certifies closure plan.
Day 180	Closure Complete. Complete removing equipment from facility. Independent engineer inspects facility, reviews sample results, certifies closure plan.

8.6 NOTIFICATION OF CLOSURE

The owner or operator will notify the Regional Administrator of commencement of closure activities at least 60 days prior to that date.

The date on which closure activities will commence will be no later than 30 days after the final volume of PCB contaminated wastes are received.

8.7 TIME ALLOWED FOR CLOSURE

All PCB contaminated wastes will be removed from the site within 90 days after receiving the final volume of PCB wastes, as indicated previously. Should an unexpected contingency occur whereby this deadline cannot be met, the owner or operator will submit a written request to the Regional Administrator requesting an extension of this deadline at least 30 days prior to the end of the 90-day period.

8.8 CERTIFICATION OF CLOSURE

Within 60 days of completion of closure, the owner or operator will submit to the Regional Administrator, by registered mail, a certification that the facility has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by the owner or operator and an independent registered professional engineer who will supply documentation supporting the certification.

8.9 AMENDING THE CLOSURE PLAN

The owner or operator of this facility will submit a revised closure plan to the agency at least 60 days prior to any proposed change in facility design or operation, no later than 60 days after an unexpected event has occurred which has affected the closure plan. Should an unexpected event occur during closure, the owner or operator will submit the revised closure plan no later than 30 days after the unexpected event.

Should the agency request a modification of the closure plan, the modified plan will be submitted within 60 days of the receipt of the request, unless the request is made during closure, in which case the modified plan will be submitted within 30 days of the receipt of the request.

9.0 CLOSURE COST ESTIMATE

Closure cost estimates have been developed for the closure of the facility in accordance with the closure plan outlined above. These closure cost estimates were developed based on the Use of off-site treatment, storage and disposal facilities for the disposal of all PCB wastes, kerosene rinses, detergent rinses and clean water rinses as well as the use of third-party contractors to perform labor and associated services. Closure cost estimates are based on the assumption that all storage cells are filled to capacity at the time of closure. Closure cost estimates are as follows:

APPENDIX 3 – PCB TRAINING

PCB Management (SS2030)

Management of Polychlorinated Biphenyls (PCBs) is administered under the Toxic Substance Control Act (TSCA) by USEPA. PCBs are typically an oily material previously used as a cooling fluid in electrical transformers, but can also be present in capacitors and lighting ballasts. Can causes ill-health effects and is a known carcinogen. Generally routes of entry are by absorption or ingestion, but can become aerosol-like (or a mist) or attach to dust and become airborne and then be inhaled.

PCBs (cont.)

- **What Are PCBs?**

PCBs are a group of man-made organic chemicals consisting of carbon, hydrogen and chlorine atoms. The number of chlorine atoms and their location in a PCB molecule determine many of its physical and chemical properties. PCBs have no known taste or smell, and range in consistency from an oil to a waxy solid.

PCBs (cont.)

- PCBs belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons. PCBs were domestically manufactured from 1929 until manufacturing was banned in 1979. They have a range of toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications including:

PCBs (cont.)

- Transformers and capacitors
- Electrical equipment including voltage regulators, switches, re-closers, bushings, and electromagnets
- Oil used in motors and hydraulic systems
- Old electrical devices or appliances containing PCB capacitors
- Fluorescent light ballasts
- Cable insulation
- Thermal insulation material including fiberglass, felt, foam, and cork

PCBs (cont.)

- Adhesives and tapes
- Oil-based paint
- Caulking
- Plastics
- Carbonless copy paper
- Floor finish

PCBs (cont.)

- Release and Exposure of PCBs

Today, PCBs can still be released into the environment from:

- Poorly maintained hazardous waste sites containing PCBs
- Illegal or improper dumping of PCB wastes
- Leaks or releases from electrical transformers containing PCBs
- Disposal of PCB-containing consumer products into municipal or other landfills not designed to handle hazardous waste
- Burning some wastes in municipal and industrial incinerators

PCBs (cont.)

- **Health Effects of PCBs**

PCBs have been demonstrated to cause a variety of adverse health effects. They have been shown to cause cancer in animals as well as a number of serious non-cancer health effects in animals, including: effects on the immune system, reproductive system, nervous system, endocrine system and other health effects. Studies in humans support evidence for potential carcinogenic and non-carcinogenic effects of PCBs. The different health effects of PCBs may be interrelated. Alterations in one system may have significant implications for the other systems of the body.

PCBs (cont.)

PCB shipment requirements:

- PCB wastes must be profiled and CPG approved prior to shipment
- Each shipment must be accompanied by a properly completed uniform manifest:

✓ DOT shipping name identifies PCBs, quantity indicated in kilograms, out of service date shown, all signatures present, etc.

- For shipments not accompanied by a manifest an Unmanifested Waste Report must be completed and submitted to EPA.

PCBs (cont.)

Denton Storage Capacities and Requirements:

- Container Storage Area 3, Bay Area B
- The total permitted PCB drum storage for the facility is 90, 55-gallon drums or 5,000 gallons. There should never be more than 5,000 of PCB material in the authorized location
- The storage area must have PCB markings on all entrances to the area where PCBs are stored
- Containers of PCBs MUST always remain closed and sealed – i.e., no bulking, consolidation, co-mingling, etc., allowed

PCBs (cont.)

- **All PCB containers that are TSCA regulated should have a PCB label.**

- All PCB containers should be clearly marked with the date that the material was removed from service. True for manifest which must have weight in kilograms.
- Implementing the use of drip pans/containment pallets or other means of segregation should separate incompatible materials stored in the same bay.

PCBs (cont.)

Inspection Requirements:

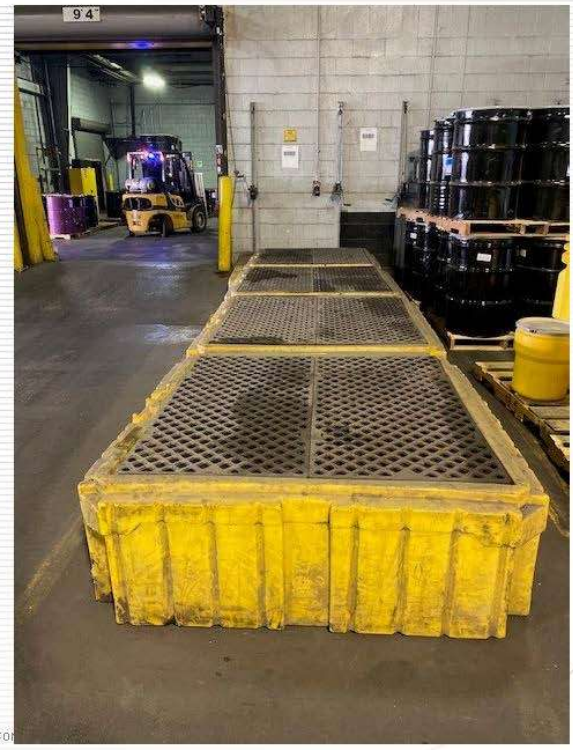
- Upon arrival all PCB shipments must be inspected for any spills/leaks. All spills/leaks must be immediately isolated/contained and reported to the shift supervisor. NOTE: Special decontamination procedures/equipment are required for PCB clean-up by specially trained employees
- All manifests must be reviewed and compared to the PCB waste profile, container labels/markings; container count must match that on manifest, all names/signatures are provided and are legible.
- Discrepancies in container count must be immediately reported to the shift supervisor for possible manifest discrepancy resolution.

PCBs (cont.)

Inspection Requirements:

- After acceptance and for duration of storage at least weekly Container Storage Area 3, Bay Area 3 must be inspected for:
  - Container Storage Area 3 secondary containment as well as Bay Area B secondary containment pallets integrity (e.g., no cracks, accumulated liquids/debris, etc.)
  - Proper container labels/markings are present
  - Containers integrity is sound (e.g., no bulging, excessive corrosion or denting, material on outside of container, properly closed/sealed, etc.)
  - No container spills or leaks – report any spills or leaks immediately
  - PCB waste container capacity is not exceeded
  - All proper PCB markings/signage for the area are present

Container Storage Area 3, Bay Area B



PCBs (cont.)

Record Keeping Requirements:

- Annual Document Log
- All Manifests Generated or Received
- All COD's Generated or Received
- Records of Inspections and Cleanups
- Annual Report

The annual document log is a year over year accounting of the containers received, shipped and generated by the facility during that year. Certificates of Destruction (CODs) are placed with the outgoing manifest in the file and the COD date is recorded in Win Web. Records of inspections are kept in the operating record in Win Web.

APPENDIX 4 – STORAGE CAPACITY

6.0 MAXIMUM QUANTITY OF PCB WASTE AND FACILITY CRITERIA

6.1 Maximum Quantity Of PCB Waste

This facility operates as a repackaging, bulking, consolidation, transfer, and storage facility for off-site generated hazardous and nonhazardous wastes, as well as a storage facility for PCBs. The facility will handle PCBs in one (1) storage area - Bay Area B, Container Storage Area 3 – see Appendix III for site diagrams. That is the only three unit onsite where PCBs are stored.

The maximum quantity of regulated PCB material that will be stored at the facility at any one time will be the equivalent of ninety (90) 55-gallon drums (5,000 gallons). The total site storage of TSCA regulated PCBs will not exceed 5,000 gallons.

All containers will be DOT approved, non-leaking, properly labeled containers in good condition. In the PCB storage area, containers will be placed in rows four feet wide with two foot aisles between rows. On average, containers with a capacity equal to or greater than 30 gallons will be stacked 2 high, while containers with a capacity of less than 30 gallons will be stacked 4 high. All containers will be placed on pallets.

6.2 Facility Criteria

6.2.1 Bay Area B, Container Storage Area 3

Container Storage Area 3 in Building No. 7 is currently in a completely enclosed, roofed, steel shell building of approximately 32,000 square feet. The dimensions of Container Storage Area 3 are 80' x 400'. The floor is concrete with berms located at each personnel or vehicle exit. The secondary containment capacity of Container Storage Area 3 is 210,380 gallons.

The mid-section of Building No. 7 is currently segregated into storage/containment areas separated by masonry walls or ~6" high curbs. The floor and bins are free from cracks and seams. Ramps lead into each containment area. The floor area in Container Storage Area 3 is overlaid with concrete a minimum of 3" thick and sloping to blind sumps. The walls defining the containment areas are reinforced concrete curbs. All concrete work is free of cracks and control joints. Construction joints between walls and slabs contain steel plate waterstops. The containment has a volume in excess of 10% of the storage volume of Container Storage Area 3 and the interior surfaces are sealed with a chemically resistant sealer.

Additionally, to provide segregation from other materials stored in Container Storage Area 3, Bay Area B has two (2) secondary containment pallets measuring 124 1/2" x 61 5/8" x 22" each for PCB segregation/storage that have a containment capacity of 535 gallons each for a total tertiary (i.e., within Container Storage Area 3 secondary containment) containment capacity of 1,070 gallons – see Exhibit 1.

6.2.2 Containment System Capacity

Normally, PCBs stored in Bay Area B, Container Storage Area 3 will be 55-gallon drums or 85-gallon overpacks. However, at times smaller containers or PCB equipment such as capacitors on pallets or transformers will be stored.

All of Container Storage Area 3 has a monolithic floor sloping back to dry sumps. Additionally, to provide segregation from other materials stored in Container Storage Area 3, Bay Area B for PCB storage two (2) secondary containment pallets that hold 535 gallons each are used. The secondary containment pallets have the following dimensions:

124 1/2" x 61 5/8" x 22" each X 2 = 1,070 gallons.

Total PCB Secondary Containment Volume:
Two (2) secondary containment pallets' capacity = 1,070 gallons.
+
Container Storage Area 3 secondary containment capacity = 210,380 gallons
= 211,450 gallons.

Maximum Allowable PCB Storage Volume = 5,000 gallons

6.2.3 Removal of PCBs from Containment System

PCB spills or leaks will be promptly removed from the containment system. The recovered material will be transferred into an appropriate container for proper disposition. Waste will not be placed in any container which contains incompatible material.

If a single drum is leaking, it will be repacked, and the new drum will be labeled according to the applicable regulations. If multiple drums containing compatible materials from different sources of generation leak or spill simultaneously, the collected mixture will be repacked. The emptied drums from which the leak or spill occurred will be identified in the operating log, and the repackaged material will be handled as required for PCB waste. These drums will be stored in separate temporary location with secondary containment until all proper clean up procedure has been completed. The waste will be properly labeled and stored until it is shipped off-site for ultimate disposal.

Since containers with incompatible materials will not be stored within the same contained areas, leakage will not cause any adverse chemical reactions. The existing warehouse has eleven segregated containment areas for liquid waste which readily allows separation of incompatible materials. However, to store the small quantity of potentially incompatible PCB material in Container Storage Area 3, separate secondary containment pallets are utilized. The secondary containment pallets are made of an impervious material with no seams and are constructed with walls at least 6 inches high having a containment capacity equivalent to the largest single item stored or >10% of the total volume off all items stored in Bay Area B – see Exhibit 1.

The various containment areas in Container Storage Area 3 allow for material to be

segregated; thus eliminating the mixing of incompatible materials in the event of a spill. Leaks will drain into blind sumps and will not commingle with materials in adjacent areas.

6.2.4 Control of Run-on and Run-off

Since storage is inside an enclosed building, provisions for preventing run-on and run-off are not applicable. The warehouse area has berms and overhead doors to prevent precipitation from entering the warehouse area.

The truck unloading area, which is provided with secondary containment, is also covered by a roof with an additional 10-foot overhang to prevent windblown precipitation. The building is above grade and the approach to the dock area is sloped away from the structure; thus precluding precipitation and surface water run-on.

6.2.5 Facility Location

The Denton facility is located at 1722 Copper Creek Road, Denton, TX 27320. The site and the surrounding area is zoned industrial. The facility is located in an industrial park. The facility is not located in the 100 year flood water elevation.

6.2.6 Other Waste Activities

The facility currently has a RCRA Part B hazardous waste operating permit which was issued by the Texas Commission on Environmental Quality (TCEQ). The facility stores and consolidates a wide variety of hazardous wastes. The facility is also authorized to serve as a hazardous waste transfer facility.

APPENDIX 5 - CERTIFICATION

7.0 CERTIFICATION

7.1 Certification Of Compliance With 40 CFR 761.65 (b)

Facility Certification Statement
Safety-Kleen Systems, Inc.
Denton, TX

"Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 2615), I certify that the existing facility is in compliance with all requirements of 40 CFR 761.65 (b). This certification is based on visual inspections of the facility. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate and complete."

Signature _____ Date 1/24/2024

David A. DeSha
Typed Name

Director Environmental Compliance
Title

APPENDIX 6 – SAFETY AND CONTINGENCY PLANS

Safety-Kleen Systems-Denton Recycling Center-Health and Safety Plan Rev3

Safety-Kleen Systems Inc.
Denton TX
Health and Safety Plan (HASP)

Initial Preparation Date:	11/28/2016	**Review Date**	**6/20/2024**
Prepared By:	John Andrews		
Reference:	OSHA 29 CFR 1910.120		

Revision Date:	**Revision #**	**Reason**
11/28/2016	1	Added Equipment closure tanks to JHA
6/20/2024	2	Reference MOC in new technology
6/20/2024	3	Update site location and history
Applicable Departments:		

PROGRAM SUMMARY:

As required under OSHA 29 CFR 1910.120(b) employers involved in hazardous waste operations, Site Remediation or Spill Response are required to develop and implement a written Health and Safety Plan (HASP) for their Site and employees.

This plan in conjunction with Site Specific Health & Safety Programs, Standard Operating Procedures (SOPs) and Corporate Standards are designed to identify, evaluate, and control safety and health hazards at our site.

This written Health & Safety Plan, Site Specific Health & Safety Programs and Site Specific Standard Operating Procedures (SOPs) are available to any Safety Kleen employee working at this site, the employee designated representative, contractor or subcontractor or their representative who will be involved with the hazardous waste operation.

Health and Safety Plan Index

I. PROGRAM ELEMENETS

II. REFERENCED H&S PROGRAMS

Required Work Permits	
77DNR Hot Work Permit	For any flame or spark-producing activity
77 DNR Energized Electrical Work	This Permit is to be used when electrical equipment cannot be placed in electrically safe position.
77DNR Excavation Permit	For any excavating (including drilling) in earth, roads, parking lots, slabs, and slab floors and for installing fence posts and grade or lay-out stakes
77DNR CSE Permit	To enter vessels and confined spaces such as underground manholes
77DNR Crane and Rigging Permit	Whenever a crane is used on site
	To allow access to a roof
77DNR Line Break Permit	To open any process or service line
77DNR Energy Control Permit - Master Lockout Tagout List	To Control Hazardous Energy
Notes: **Job Safety Briefing must be conducted prior to project start-up non-routine work assignments** **For Confined Space Entry contractor must pre-approved and provide own Permit.**	

Programs and Forms can be accessed through Denton's Share Point Site

INTRODUCTION

Current TSDF Site Activities

The Denton Recycle Center is a permitted treatment and storage facility that accepts waste from Safety-Kleen customers, Safety-Kleen facilities, and other industrial and commercial facilities. The site operations includes Medical Waste Traansfer Facility, Fuels Blending, Oil Filter Processing, Used Oil, Oils and Waste Oil management, Distillation, Product Distribution, 10 Day Transfer Operations TSDF activities, TSCA Storage and Maintenance Activities.

Current Remediation Activities

Trihydro Corporation (Trihydro) is managing an ongoing Resource Conservation and Recovery Act (RCRA) Facility Investigation at the Safety-Kleen (S-K) Dentons Recycle Center. Work consists of onsite and off-site groundwater characterization. A groundwater injection of nutrients. Various hydrogeologic and engineering tasks are performed in connection with this work.

Potential field activities for include:
1. Site visits
2. On-site and off-site groundwater sampling
3. Nutriant injection into wells

Spill Response

When a spill occurs, efficient and safe clean-up is critical. The site has a crew that is specially trained to respond to spill and conducts drills on an annual basis.

Closure Activities

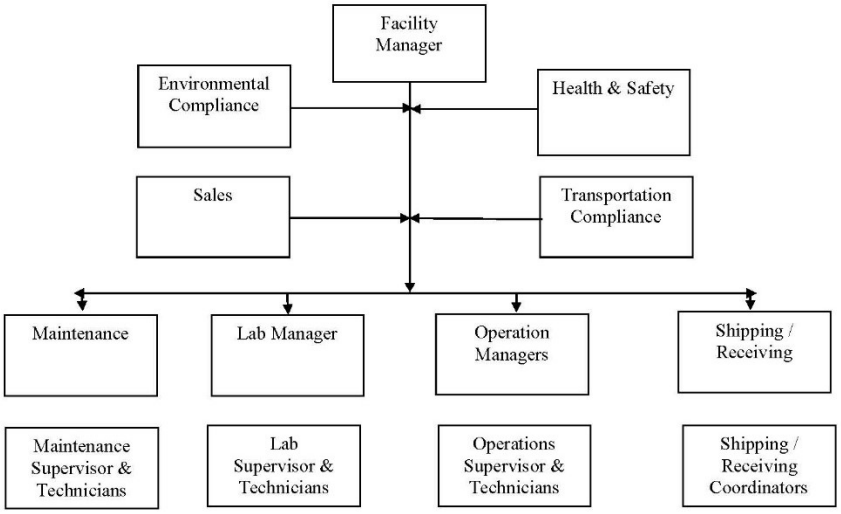
As part of the site's RCRA permit, a closure plan was developed for the site. This plan would be implemented in part or whole for closure of a solid waste management unit at the site or closure of entire site. At this time no closure activities are planned or anticipated.

ORGANIZATIONAL STRUCTURE

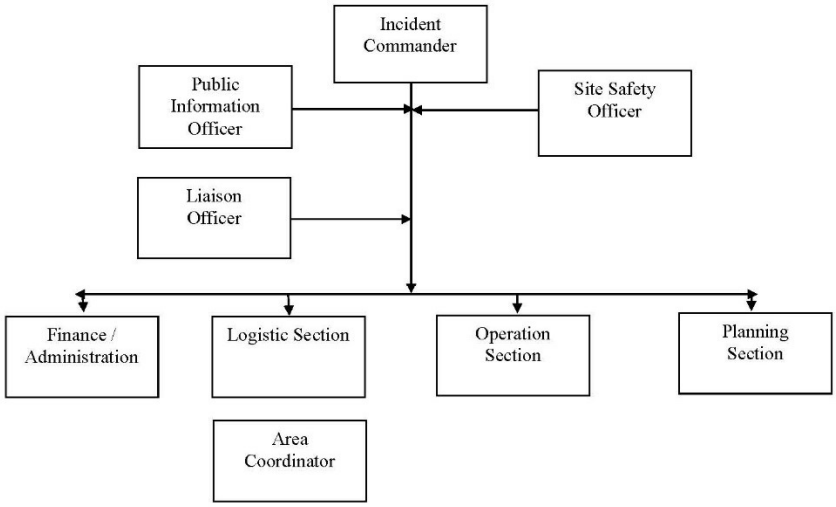
This section of the Health and Safety Plan (HASP) describes lines of authority, responsibility, and communication for health and safety functions at this site.

The organizational structure of this site's safety and health program is consistent with OSHA requirements in 29 CFR 1910.120(b)(2).

TSDF ORGANIZATIONAL STRUCTURE



RESPONSE ORGANIZATIONAL STRUCTURE



Duties and responsibilities of TSDF Staff

Facility Manager

The Facility Manager has responsibility and authority to direct all daily work operations. The Facility Manager will ensure that all employees are trained and knowledgeable regarding the proper operating procedures and to ensure all personnel comply safe work practices.

Health and Safety Manager

The specific responsibilities of the Health and Safety Manager are: Supporting the management of safety and health functions on this site; serving as the site's point of contact for safety and health matters; ensuring site monitoring, worker training, and effective selection and use of PPE; assessing site conditions for unsafe acts and conditions and providing corrective action; assisting the preparation and review of this HASP; maintaining effective safety and health records.

Department Managers

The Department Managers are responsible for directing daily workflow of their departments. Monitoring, and enforcing all policies and procedure with the employees, and for ensuring all equipment and required PPE are available to the employees.

Site Supervisors

The Site supervisor and/or lead foreman for this process are responsible for directing and monitoring, employees, and for addressing day to day logistical challenges to the work process and employees.

Site Workers

The Site Worker; Processing Operator, Facility Technician, Facility Coordinator, Lab Chemist, Maintenance Technician and other individuals are responsible for adhering to safe work practices and all provisions found in companies Policies and procedure. Employees must inspect equipment and report any failures or deficiencies to the appropriate Supervisor.

Duties and responsibilities of Incident Command Staff

At the top of the hierarchy is the Incident Commander (IC) who overseas the overall incident management operations besides developing goals and objectives of the incident response. The IC neither belongs to the Command nor General staff.

The IC unless he/she assigns duties to CS of GS, is responsible for establishing quick safety priorities in case of emergencies and stabilizing the incident by availing cost effective and efficient ilfe saving resources, create incident objectives. Other responsibilities of IC include approving the implementation of Action Plan and ensuring that sufficient safety and health measures are available during emergencies.

The Command Staff (CS) is responsible for carrying out staff functions which are essential in supporting the duties of an IC. These functions are incident safety, liaison, and public affairs.

The information Officer is tasked with developing and releasing incident information to the media, conducting press briefing, maintaining incident information, and availing to the incident personnel any incident information. The information officer also monitors and maintains any media information that can be used for incident planning.

The Liaison Officer is responsible for coordinating incident activities between numerous agencies and IC. The duties include maintaining a list of agencies, establishing and coordinating interagency activities, and monitoring incident operations in order to identify potential problems.

The Site Safety and Health Offices (SSHO) has full responsibility and authority to develop and implement this HASP and to verify compliance. The SSHO is on site or readily accessible to the site during all work operations and has the authority to halt site work if unsafe conditions are detected. The specific responsibilities of the SSHO are: Managing the safety and health functions on this site; serving as the site's point of contact for safety and health matters; ensuring site monitoring, worker training, and effective selection and use of PPE; assessing site conditions for unsafe acts and conditions and providing corrective action; assisting the preparation and review of this HASP; maintaining effective safety and health records as described in this HASP; coordinating with the Emergency Response Coordinator (ERC), Site Supervisor(s), and others as necessary for safety and health efforts.

SITE CHARATERIZATION AND JOB HAZARD ANALYSIS

This section of the HASP identifies and describes safety and health hazards associated with site work. The purpose of characterization and job hazard analysis is to identify and quantify the health and safety hazards associated with each site task and operation, and to evaluate the risks to workers. With this information, risks are then eliminated if possible, or effectively controlled. The information contained in this section of the HASP is essential to effective preparation of all other sections of the HASP. This section of the HASP includes:

* site history
* job hazard analysis
* chemical and biological hazard information
* employee notification of hazards

The Health and Safety Manager is the person responsible for ongoing site characterization and job hazard analysis at this site.

Site Location:

The current operating portion of the site occupies approximately ten acres of 22 acres owned by Safety-Kleen Systems, Inc. The facility is zoned Planned Development-18 and is situated in an area of light industrial and agricultural uses. The nearest residence is approximately 500 feet south of the site. A railroad abuts the north boundary. The terrain is gently rolling and drains to the Cooper Creek, which is slightly more than one half mile from the site. The nearest surface water body utilized for drinking water is Lake Lewisville, which is located approximately eight miles to the southeast of the site. The facility obtains its water supply from the City of Denton. Non-process water is discharged to the sanitary sewer. Information from the Federal Insurance Administration Map shows that the facility is not located in the 100-year flood zone.

Site History:

The facility was started in 1975 as a parts washer recycling facility for Safety-Kleen. In the middle 1980's, operations expanded to include dry cleaning recycling. During the early 1990's, the facility expanded to handle fuel blending, gun cleaner, and debris bulking operations. Toll recycling capabilities were added during the middle 1990's. In 2012 Safety-Kleen Systems, Inc. was purchased by Clean Harbors. During 2014 and 2015 the facility underwent the discontinuation of certain operations which were closed in 2017.

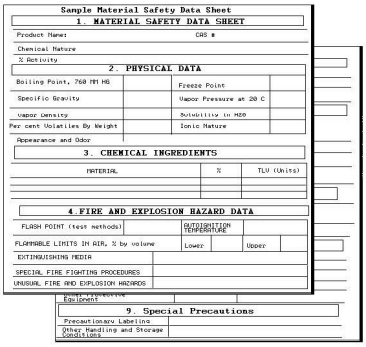
Chemical Hazards

All Hazardous waste received at the site are stored in an area with secondary containment that will not allow a spill to enter into the environment, stored with compatible wastes, and labeled.

Based on permit conditions, the chemicals processed at the site include the individual compounds present in petroleum hydrocarbons, including volatile and semi-volatile organic compounds and heavy metals. Materials passing through our ten day transfer facility are far more varied. Although no SDS is available for Waste the site does preform analysis on any inbound load for processing to verify it matches profile and is amenable for processing.

A Safety Data sheet (SDS) is a document that gives detailed information about a material, including any hazards associated with the material. The SDS includes information such as the properties of each chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical. The information contained in the SDS must be in English.

Obtaining SDS for products used at Denton


Sample Material Safety Data Sheet
1. MATERIAL SAFETY DATA SHEET
Product Name: CAS #
Chemical Nature
% Activity
2. PHYSICAL DATA
Boiling Point, 760 MM HG | Freeze Point
Specific Gravity | Vapor Pressure at 20 C
Vapor Density | Solubility in H20
Per cent Volatiles By Weight | Ionic Nature
Appearance and Odor
3. CHEMICAL INGREDIENTS
MATERIAL | % | TLV (Units)
4. FIRE AND EXPLOSION HAZARD DATA
FLASH POINT (test methods) | AUTOIGNITION TEMPERATURE
FLAMMABLE LIMITS IN AIR, % by volume | Lower | Upper
EXTINGUISHING MEDIA
SPECIAL FIRE FIGHTING PROCEDURES
UNUSUAL FIRE AND EXPLOSION HAZARDS
Equipment
9. Special Precautions
Precautionary Labeling
Other Handling and Storage Conditions

All SDSs manufactured at this site can be found in the Product Support Documentation in Clean Harbors share Point Site

Or by

Contact Info CHES: (800) 468-1760

Or by

For online access to a **Safety Data Sheet,** **click the MSDS link** on our company's intranet, or **scan the QR Code below with your phone's camera:**

Clean Harbors

Scan to access an MSDS

Access to Chemicals Manufactured at the Denton site can be obtained by visiting the Product Support Page on Clean Harbors Share Point site.

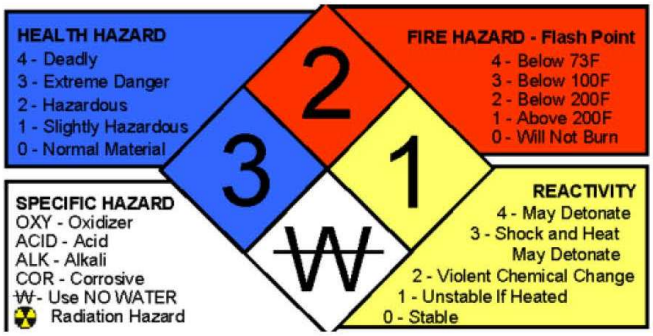
PIPE MARKING

Safety Kleen now uses color coding system for identifying pipes with pipe wraps and arrows to indicate piping content.

- Propylene Glycol- Safety Red
- Methanol- High Gloss White
- WWF- Safety Blue
- Antifreeze Safety Yellow
- 150 Solvent John Deere Green
- Used Solvent Chestnut Brown
- Used Oil & Oily Water High Gloss Black
- Fuel Blending Marlin Blue

TANK MARKING

The National Fire Protection Association (N.F.P.A) diamond is the standard label that is displayed on large capacity storage tanks at this site.



Additional information about Hazard Communication at this site can be found in our written 77DNR Hazard Communication Program.

Biological Hazards

Blood Borne Pathogens

Employees of Safety-Kleen Systems, Inc. do not perform jobs in which tasks routinely involve contact with Biohazardous Material. There are however, individuals at our facilities trained to perform first aid and CPR, others that are required to clean restrooms and other that may need to response to spills in our 10 Day Transfer Facility that could involve Potentially Infectious Material (PIM).

Pandemic Plan

The Company is dedicated to the protection of its employees, facilities, and resources. Also, we are committed to ensuring that our company can continue all aspects of its critical business processes during a pandemic and can safely resume normal operations as quickly as possible after a pandemic affects our facility(ies). We place a high priority on developing, validating, and, if necessary, implementing our company's Pandemic Plan.

Job Hazard Analysis

Controlling a hazard at its source is the best way to protect employees. Depending on the hazard or workplace conditions, OSHA recommends the use of engineering or work practice controls to manage or eliminate hazards to the greatest extent possible. The site may use several techniques to identify hazards and implement controls.

As part of this program Safety Kleen has developed and implement a programs and Hazard Assessment and Control Program, IH Program and Process Hazard Analysis Standard to identify and to quantify safety and health hazards in order to determine the appropriate preventative measures to protect against these hazards.

In general Safety Kleen has developed Operating Procedures with accompanying Job Hazard Analysis and PPE Hazard Assessment for all routine task. These are reviewed periodically. For Non Routine Work & Contract Services JHA/JSB Form to help identifying hazards associated with Non Routine Task and establishing control measures. This should be used with all Non-Routine Work activities and Contract Work onsite.

Permits

Required Work Permits	
Hot Work	For any flame or spark-producing activity
Electrical Safety Permit	This Permit is to be used when electrical equipment cannot be placed in electrically safe position.
	For any excavating (including drilling) in earth, roads, parking lots, slabs, and slab floors and for installing fence posts and grade or lay-out stakes
Confined Space Entry	To enter vessels and confined spaces such as underground manholes
Crane and Crital Lift	Whenever a crane is used on site
Roof Access	To allow access to a roof
Line Break	To open any process or service line
LOTO	To Control Hazardous Energy
Notes: **Job Safety Briefing must be conducted prior to project start-up non-routine work assignments** **For Confined Space Entry contractor must pre-approved and provide own Permit.**	

Employee Notification of Hazards and Overall Site Information

This Health and Safety Plan (HASP) must be reviewed by New employees who could be affected by Hazard described in HASP it prior to the time they begin their work activities. Modifications to the program should be communicated during routine briefings.

Consistent with paragraph (i) of HAZWOPER, we also inform other contractors and subcontractors about the nature and level of hazardous substances at this site, and likely degree of exposure to workers who participate in site operations. This is accomplished through our Contractor Safety Orientation.

PPE

This section of our HASP describes how PPE is selected and used to protect workers from exposure to hazardous substances and hazardous conditions on this site. Our site safety goal is to eliminated or reduced hazards to the greatest extent possible through engineering controls and work practices. Where hazards are still present, a combination of engineering controls, work practices, then PPE are used to protect employees.

The site has developed a Hazard Assessment and Control Program to assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the implementation of workplace controls and or the use of personal protective equipment (PPE).

If such hazards are present, or likely to be present, the site will:

- Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment
- Communicate selection decisions to each affected employee
- Maintain selection of PPE that properly fits each affected employee

Below is the link PPE required by job task: 77DNR PPE Hazard Assessment and Summary

DENTON PERSONAL PROTECTIVE EQUIPMENT REQUIREMENTS

TASK	HEAD	FOOT	EYE / FACE	Ear	Hand	Body	RESPIRATOR	Other
Transfer of Fluids	IE							
Sorting and Handling Debris Material	IE	ST + MT +PR	PS	EP	CRGK or LPG	WU		
Working at the Pump Station	IE	ST + MT +PR	CG & FS	EP	NG (i) + ChRGNi (C)	WU		
Dumping and Filling Immersion Cleaner	IE	ST MT PR	CG & FS	EP	NG (i) ChRGNi (C)	WU		
Lab Operations		ST	PS		NG	WU + LC		
Operating forkifts	IE	ST + MT	PS		CRGK or LPG	WU		
Material Handling	IE	ST + MT + PR	PS		NG(i) CRGK or LPG	WU		
Changing Propane Bottles on Equipment	IE	ST + MT	PS		ChRGNi	WU		
Cutting Tourch	IE	ST + MT	PS=FS-(shade 4)	EP	HRWG	WUFR	APR=P-95 / P95 dust mask	
Welding Metal Arc	IE	ST MT EH	PS= FS-(shade 12)	EP	HRWG	WUFR	APR=P-95 / P95 dust mask	
Grinding	IE	ST + MT +EH	PS=FS-(shade 4)	EP	HRWG	WUFR	APR=P-95 / P95 dust mask	
Electrical Work Hazard Risk Category 0	IE	ST + EH +MT	PS		LG	WUFR		
Electrical Work Hazard Risk Catogory 1,2	IE	ST + EH +MT	APFS + BCH	AB	T1ESGC2+LG	WUFR		
First Aid Control of Bleeding w/ spurting blood			PS + FS		ChRGNi	PTC		
FA/CPR Cleaning Bio Spills			PS + FS		NG	PTC		
FA/CPR Giving Injection			PS		NG			

MATERIAL HANDLING PROGAM

If drums or containers on the site need to be moved, inspect them for leaks or signs that they may fail. Consider unlabeled containers as containing hazardous materials, until chemical sampling verifies that their contents are not hazardous. Always use explosion-resistant equipment to handle containers in flammable atmospheres.

Controlling leaks and spills.

Train workers on procedures to contain leaks or spills and appropriate containment equipment. Provide salvage containers and absorbents at the site. Assess exposure risks *before* moving containers that show signs of weakness, bulging, or swelling, or containers that contain radioactive waste.

Opening hazardous waste containers.

Use caution when opening containers with pressurized contents; open them from a remote location or use appropriate shielding. Workers not involved in opening such containers must keep a safe distance or be protected by a suitable shield. Allow only specially trained workers to open laboratory waste packs.

Shock-sensitive waste.

Shock sensitive material should only be handled by our energetics group. When handling shock-sensitive waste, first evacuate all non-essential workers from the area, Use an employee alarm system to signal the start and completion of explosive waste handling activities. Use handling equipment that has explosion-resistant shields or barriers. Handlers must keep continuous communication with the site's safety and health supervisor.

All drum handling should be in accordance with our Drum and Container Handling Standard (HS.00022.T2S-10HS) and by employees trained on Drum and Material Handling (HS6308) and site specific procedures.

NEW TECHNOLOGY PROGRAM

Periodically Safety Kleen will evaluate equipment with new technologies aimed at improving the protection of workers at worksites. Such equipment may include new foams, absorbents, adsorbents, and neutralizers potentially used to decrease exposures. Evaluation is necessary to determine the effectiveness of worker protection before implementing new technologies on-site. Review manufacturer and supplier information as part of the evaluation.

Where hazardous substances may be released by spilling from a container that will expose employees to the hazards of the materials, the employer will need to implement a program to contain and control the spilled material. Diking and ditching, as well as use of absorbents like diatomaceous earth, are traditional techniques which have proven to be effective over the years. However, in recent years new products have come into the marketplace, the use of which complement and increase the effectiveness of these traditional methods. These new products also provide emergency responders and others with additional tools or agents to use to reduce the hazards of spilled materials.

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Where processes expo may expose employees to the hazards substances employer should investigate technologies that reduce exposure and increase efficiencies. Examples could be an enclosed sampler on process equipment or dry disconnects on product hoses.

For this site we initiate changes through our MOC process.

Procedure must be updated and involved workers trained in operating procedures of any new technology implimented.

SITE CONTROL

This site control program is designed to reduce the spread of hazardous substances from contaminated areas to clean areas, to identify and isolate contaminated areas of the site, to facilitate emergency evacuation and medical care, to prevent unauthorized entry to the site, and to deter vandalism and theft.

The site control program includes the elements specified in 29 CFR 1910.120(d) and provides the following site-specific information:

* site access procedures
* site security
* use of the buddy system
* Site communications

Site Access

Fencing is used to control the activities and movement of people and equipment in order to minimize the potential for worker exposure to hazardous substances.

Contract personnel shall enter and exit the site only through the designated area (Building 1 or facility gate). All visitors must complete and sign form PO-2.0-SCVD. Site Safety Orientation will be given to Yellow Badge or Green Badge employees prior to work activities.

Site Security

After normal business hours (7:00AM -4:30PM) Building the site's gates are locked and visitor log transferred to Supervisor's office. access to site is through electronic gate controlled by supervisor.

Buddy System

The buddy system means that personnel work in pairs and stay in close visual contact to be able to observe one another and summon rapid assistance in case of an emergency.

The responsibilities of workers using the buddy system include:

- remaining in close visual contact with partner,
- providing partner with assistance as needed or requested,
- observing partner for signs of heat stress or other difficulties,
- periodically checking the integrity of partner's PPE, and
- notifying site personnel if emergency assistance is needed.

When use of buddy system is required:

- While working in the Exclusion Zone during site cleanup
- NPRCS,
- Work From heights,
- Energy Isolation,
- Live Energy Work,
- Open Process Lines (W/ICRT),
- Potential IDLH

Site Communications

The following communication equipment is used to support on-site communications:

(Complete the communication equipment information below, i.e., telephones, cell phones, two-way radios, and other forms communication equipment that apply to this site)

Contact list are periodially updated for the site.

TRAINING

The site training program is designed to ensure that workers receive the training they need to work safely. Site safety and health training requirements are based on the job hazard assessments contained in section of this HASP and relevant OSHA requirements.

Under the HAZWOPER standard 29 CFR 1910.120 the level of training required for workers varies by type of Operations and worked being performed at that site. There are basically three different operation that require specific training requirements under the HAZWOPER standard based on scope of work.

Training Requirements base on Scope of work:

- **TSDF Workers**
- **Site Remediation**
- **Emergency Responders**

TSDF Workers

The Training requirements include:

***New Employees (*1910.120(p)(7)(i)).**
For employees at TSDF exposed to health hazards or hazardous substances. Employee shall receive 24 hours of initial training.

Emergency Response Team Employees (1910.120(p))

Training for emergency response employees shall be completed before they are called upon to perform in real emergencies. Such training shall include the elements of the emergency response plan, standard operating procedures the employer has established for the job, the personal protective equipment to be worn and procedures for handling emergency incidents.

Refresher Training (1910.120(p))
Employee shall receive eight hours of refresher training annually.

Site Remediation Workers

None of our employees ***Site Remediation*** **Workers.** This site does have some remedial activities that include ground water remediation (completed by contractors) and the potential for operations such as closure or partial closure activities (none currently in progress) that would fall under this section of the HAZWOPER standard.

Training requirements for these employees include:

General Site Workers (1910.120(e)(3)(i)):
Employee shall receive 40 hours of initial training required, plus 3 days of hands-on training, and an additional 8 hours of refresher training each year.

Limited Task Workers (1910.120(e)(3)(ii)) :
Employee shall receive 24 hours of training to start plus a day of hands-on training. Workers must complete an 8 hour refresher course each year.

Non-Exposed Workers (1910.120(e)(3)(ii))
Employee shall receive 24 hours of instruction off the site, and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor.

Site Work Bridge 1910.120(e)(3)(iv)
Workers with 24 hours of training who are covered by paragraphs (e)(3)(ii) and (e)(3)(iii) of this section, and who become general site workers or who are required to wear respirators, shall have the additional 16 hours and two days of training necessary to total the training specified in paragraph (e)(3)(i).

Managers and Supervisors (1910.120(e)(4)) Employee must receive the same training level as the workers under their supervision, with 8 extra hours required.

Emergency Response. (1910.120(e)(7))

Employees who are engaged in responding to hazardous emergency situations at hazardous waste clean-up sites that may expose them to hazardous substances shall be trained in how to respond to such expected emergencies.

Emergency Response Workers

The final type of Operations that would require specialized training is ***Emergency Response Workers***. We do have some ***TSDF Workers*** that would respond to a spill or release in other areas of our plant not used primarily used for treatment, storage, or disposal (Product Storage, Fuel Terminal).

This is also required of contractor from off site that are entering our site to aid in a spill or release event.

Training of these employees shall be based on the duties and function to be performed by each responder of an emergency response organization. The skill and knowledge levels required for all new responders, those hired after the effective date of this standard, shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Employees who participate, or are expected to participate, in emergency response, shall be given training in accordance with the following:

- **First Responder (Awareness Level)** must simply show their competence in required duties; training must be sufficient to achieve this competence.
- **First Responder (Operations Level)** is the same as the Awareness level, with eight extra training hours.
- **Hazardous Materials Technician**. 24 hours of training required; plus whatever extra training necessary to demonstrate capability in various areas.
- **Hazardous Materials Specialists** must complete the technician-level training as well as extra training in various other subjects.
- **On Scene Incident Commanders** are required to undergo 24 hours of training, as extra training in various areas. Must show competence in these areas.

Refresher Training (1910.120(q)

Employee shall receive eight hours of ref

MEDICAL SURVEILLANCE

The medical surveillance section of the HASP describes how worker health status is monitored at this site. Medical surveillance is used when there is the potential for worker exposure to harmful levels of hazardous substances. The purpose of a medical surveillance program is to medically monitor worker health to ensure that personnel are not adversely affected by site hazards.

This site has instituted an Occupational Health and Medical Monitoring Program in accordance with the requirements of 29 CFR 190.120(f). Medical clearances are on file with Work Care.

Worker Category	When a Medical Exam is Required
▪ Workers who may be exposed to hazardous substances at or above permissible exposure limits or published exposure levels for those substances 30 or more days a year. ▪ Workers who wear a respirator for 30 or more days a year or who are required by 29 CFR 1910.134 to wear a respirator. ▪ Members of HAZMAT teams. ▪ Workers who become ill or show signs or symptoms of possible overexposure to hazardous substances.	▪ Before assignment. ▪ Every 12 months unless the physician recommends a longer interval (not to exceed 24 months). ▪ At termination of employment and at reassignment. ▪ Immediately after reporting symptoms indicating overexposure. ▪ As soon as possible after a worker reports signs or symptoms or possible overexposure to hazardous substances. ▪ When a physician determines that an examination is necessary.

EXPOSURE MONITORING

This section of the HASP provides an overview of the monitoring of hazardous substances and physical hazards, and worker exposures. In addition, the site has an Industrial Hygiene Program as required under 29 CFR 1910.120(h).

1. Direct Reading Air Monitors

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The use of Direct Reading Air Monitoring will depend on the potential atmospheric hazards, which have been identified. Direct Reading Air Monitors provide continuous real time results except for Calorimetric tubes which probe results at a specific point and time. Monitoring instruments that may be used include:

- Combustible Gas Meter
- Oxygen Meter
- Hydrogen Sulfide Meter
- Carbon Monoxide Meter
- Colometric Tubes
- Photo Ionization Detectors
- Flame Ionization Detectors

The calibration and maintenance of these instrument will be in accordance with manufactures recommendations.

2. Personnel Monitoring

Air pumps with adsorptive tube may be used as part of Job Hazard Assessment when direct reading instrument indicate potential employee exposure or when required by specific regulations. This may be completed as part of the initial Job Hazard Assessment as part of a review of the Job Hazard Assessment or based on a frequency prescribed in the OSHA's regulations. APIH recommendation will be used in determining methods used. The calibration and maintenance of these instrument will be in accordance with manufactures recommendations.

3. Noise Surveys

Noise measurements must be conducted when exposures are at or above 85 dB. These surveys should be conducted when Job Hazard Assessments suggest that noise exposures in the workplace may be at this level or employee complaints about the loudness of noise or there are indications that employees are losing their hearing. A sound level meter will be used to perform these surveys. The calibration and maintenance of these instrument will be in accordance with manufactures recommendations.

4. Personnel Noise Monitoring

Noise Dosimeter will be used to preform Personnel Noise Monitoring when noise indicators indicate the need for such monitoring. These meters can be worn by personnel to obtain individual readings of noise exposure. Typical dosimeters consist of a pocket-sized monitor with remote microphone and an indicator for readout of exposure data. Some have a preset threshold; others have a selector switch that may be preset. It is also possible to select the threshold, criterion level, and exchange rate on many dosimeters. The calibration and maintenance of these instrument will be in accordance with manufactures recommendations.

5. Radiation Survey

Ludlum Meter will be used to screen the area for radioactive material before any repackaging starts. The Ludlum meter measures the number of ionization pairs caused in air by gamma radiation per hour thus it measures roentgens per hour. Because the quantity of radiation associated with low level radioactive materials is so low, the instrument is able to detect micro roentgens. The calibration and maintenance of these instrument will be in accordance with our ISO procedures. If the Ludlum meter readings are above 50 mR/hr, leave the waste storage area and contact your supervisor and the Director of Compliance and Safety.

SPILL RESPONSE & CONTAINMENT

Listed below are the general procedures to be taken in the event of a spill or release:

- Recognizing a Chemical Release
- Report the incident
- Securing the Area
- Analyze the incident
- Use proper PPE and equipment
- Contain the spill
- Stop the leak
- Clean up the spill
- Decontaminate Procedures

The Emergency Response Guidebook will be utilized to determine spill response procedure. PPE may be selection on Hazard Assessment of SDS / Profile and Direct reading Instruments.

WARNING:

The individual in charge of the ICS shall designate a safety officer, who is knowledgeable in the operations being implemented at the emergency response site, with specific responsibility to identify and evaluate hazards and to provide direction with respect to the safety of operations for the emergency at hand. When activities are judged by the safety officer to be an IDLH and/or to involve an imminent danger condition, the safety officer shall have the authority to alter, suspend, or terminate those activities. The safety official shall immediately inform the individual in charge of the ICS of any actions needed to be taken to correct these hazards at the emergency scene.

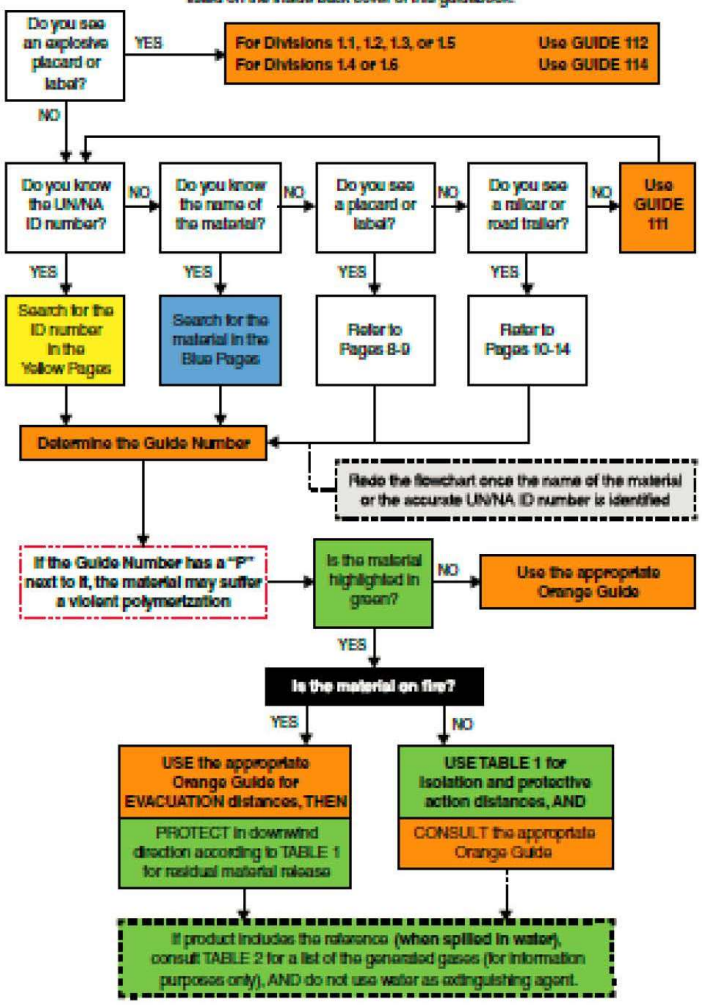
WARNING:

Employees engaged in emergency response and exposed to hazardous substances presenting an inhalation hazard or potential inhalation hazard shall wear positive pressure self-contained breathing apparatus while engaged in emergency response, until such time that the individual in charge of the ICS determines through the use of air monitoring that a decreased level of respiratory protection will not result in hazardous exposures to employees.

HOW TO USE THIS GUIDEBOOK

RESIST RUSHING IN!
APPROACH INCIDENT FROM UPWIND, AND UPHILL AND/OR UPSTREAM
STAY CLEAR OF ALL SPILLS, VAPORS, FUMES, SMOKE, AND POTENTIAL HAZARDS

WARNING: DO NOT USE THIS FLOWCHART if more than one hazardous material/dangerous good is involved. Immediately call the appropriate emergency response agency telephone number listed on the inside back cover of this guidebook.



BEFORE AN EMERGENCY - BECOME FAMILIAR WITH THIS GUIDEBOOK!
First responders must be trained in the use of this guidebook.

Page 1

Recognizing a Chemical Release
Indications of a spill include dripping or pool of liquid, unusual smells, unusual sound, loss of pressure or flow.

Report the incident
Contact your supervisor and provide the following information:

- Location of release
- Identity and quantity of spilled material (approximate area)
- If inside: size of room.
- Ask your supervisor for further instructions.

Securing the Area

- Keep people a safe distance from the spill.
- Announce Shelter in place if necessary.
- Use caution tape, rope, cones, etc.
- Stand guard of the controlled area.

Analyze the incident
An evaluation of the hazard must be conducted prior to responding to the spill. Use ERG Book to determine safe distances

Use proper PPE and equipment
PPE should be selected based on the hazard of the incident.

Contain the spill

- Earthen berms or dikes can be used to effectively contain a spill on the ground.
- Most facilities have adsorbent materials on hand which could be used to dike or absorb the spill.
- Board barriers being used in a creek for containment.
- Water by-pass dam let the water flow past while holding the oil back.

Stop the leak

- Position the container so that the hole is up right.
- Patching the hole, gash, and puncture.
- Over pack the container.
- Sticks, rags or tape can be used to slow or stop a leak you are only limited by your imagination in the field.

Clean up the spill
The cleanup actives should be based on the physical and chemical properties of the waste material.

Decontaminate equipment in exclusion zone
Decontaminate tools and equipment used in remediation activities to prevent spread of contamination

DECONTAMINATION

The section of the HASP describes how personnel and equipment are decontaminated when they leave the work areas at the TSDF or Exclusion Zone of Emergency Response to release. The decontamination procedures described below are designed to meet the requirements of 1910.120(k).

Decontamination is the process of removing or neutralizing harmful materials that have gathered on personnel and/or equipment. Decontamination is of the utmost importance because it:

- Protects all incident personnel by sharply limiting the transfer of hazardous materials from the contaminated area into clean zones;
- Protects the community by preventing transportation of hazardous materials from the incident to other sites in the community by secondary contamination; and
- Protects workers by reducing the contamination and resultant permeation of or degradation to their protective clothing and equipment.

To minimize the transfer of hazardous substances from the site, contamination control methods are needed. Generally, two control methods are used:

1. Establishing site work zones
2. Decontamination or the removing contaminates from people and equipment.

TSDF Site Controls

Decontamination procedures for routine schedule work activities:

Personnel should remove protective clothing in the following sequence if applicable. :

- Remove tape securing gloves to suit inspect and save for reuse or discard in drum.
- Remove outer gloves turning them inside out as they are removed and discard in drum.
- Remove suit turning it inside out and avoid shaking.
- Remove plastic shoe cover from one foot and discard in drum.
- Remove mask. Sanitize and place masks in Respirator Bag or place in plastic bag and store for sanitation at a later time. All respirators are to be decontaminated at the end of each workday.
- Remove inner gloves and discard in a drum.
- Personnel should then exit the decontamination area and proceed to wash facility to at a minimum wash their hands. (Sinks are available in the dirty side of the change house.)

At the end of the work shift, if available, employees should shower and change into normal cloths. Waterless soap may be used in operational areas for decontamination purposes. Each employee is assigned both a clean and dirty locker. Boots, respirator, safety glasses, and hard hats are stored in the dirty locker. Clean uniforms, personal grooming supplies and street clothes are stored in the clean locker.

Lunchroom

The hand washing facilities at the entrance to the lunchroom are used to prevent food and drink contamination.

Showers procedures end of the shift. (Every employee who wears a uniform must take a shower before going home.)

1. Place dirty uniforms in the dirty laundry chute in the locker room.

2. A heavily contaminated uniform must be placed in a plastic bag and placed in one the designated waste container at the change out stations. (The uniform will be replaced.)

3. Clean towels for showering can be found on the shelf in the closet next to the showers.

4. Dirty towels should be placed in the garbage can designated for that purpose.

Emergency Decontamination

Safety showers and eye wash stations are located in all areas where hazardous materials are handled. These facilities are to be used when skin or eye contact to hazardous materials has occurred.

Equipment Decontamination:

Tools and equipment is stored in designated areas until and not allowed to be utilized for general work activities unless the contamination equipment is decontaminated.

Equipment decontamination will be managed by the shift supervisor using only trained personnel and following all required safety procedures and permits.

Waste Disposal:

Contaminated personal protective equipment and decontamination that is no longer need or useful will be packaged and sent off site for disposal.

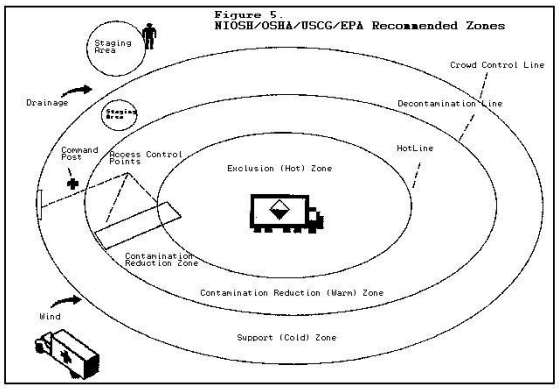
All wash/rinse water is to be collected should be disposed of appropriately.

Spill Response /ER Response Work Zones

To prevent or reduce the spread of contaminants during a spill response three work zones are established on sites where emergency responders operations occur. These three zones are the Exclusion Zone or "Hot Zone" the Contamination Reduction Zone or "Warm Zone" and the Support Zone or "Cool Zone"

The exclusion Zone or Hot Zone is where contaminates exist. When carrying out activities in the Exclusion Zone, workers should use the "buddy system" to ensure that rapid assistance can be provided in the event of an emergency. The "buddy system" is an approach used to organize workgroups so that each worker is designated to be observed by at least one other worker.

Between the exclusion zone and the support zone is the contamination reduction zone or CRZ this transition area has a corridor, where decontamination takes place. The support zone is the outermost part of the site and is consider uncontaminated support equipment is located in this zone and traffic is limited to authorized personnel.



EMRERGENCY RESPONSE PLAN

This section of the HASP identifies our Emergency Response Plan as required in 1910.120(p)(8)(i). This site has developed an Emergency Action Plan required by OSHA 29 CFR 1910.38(a), SPCC and Contingency Plan.

The Contingency Plan must be implemented in the event of a

- Fire
- Explosion
- Release (Air, Water, Land) of hazardous waste constituents which could threaten human health or the environment.

As part of our Emergency Action Plan (EAP), events that call for implementing Contingency Plan require our employee to immediate shut down operations and evacuate the site. At that time it would be up to the Emergency Responders to develop a HASP including a response plan based on the their activities and hazard involved.

The decision to implement the Contingency Plan will be made by the Incident Commander.

Note: Responses to spills of hazardous substances where there is no potential safety or health hazard (i.e., fire, explosion, or chemical exposure to outside population) are not considered to be emergency responses. These spill responses are defined as incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate area, or by site Spill Response Team are not considered to be emergency responses within the scope of this standard.

HASP REVIEW RECORD

Project & Site Name: _Denton RC- TSDF Operations_

This Health and Safety Plan (HASP) has been reviewed by the following persons. Signature below indicates that the individual has received job specific training as outlined in the site training packets and agrees to abide by the rules outlined therein. Signature also indicates that individual has current HAZWOPER certification (per Federal 29 CFR 1910.120 requirements), and is therefore eligible to take part in hazardous waste operations at this site*:

Signature:	Company:	Date:

Attachment 4

safety-kleen®

Contingency Plan

Safety-Kleen Systems, Inc.
&
Clean Harbors Environmental Services, Inc.
1722 Cooper Creek Road
Denton, TX 76208
Denton County

October 4, 2019
(Revised 3/24/2023)

Quick Reference Guide

1.0 TYPE/NAMES AND ESTIMATED MAXIMUM AMOUNTS OF HAZARDOUS WASTE

Safety-Kleen Systems, Inc. operates under the NAICS Code 562211 for Hazardous Waste Treatment and Disposal. By definition this NAICS code is as follows: "this U.S. industry comprises establishments primarily engaged in (1) operating treatment and/or disposal facilities for hazardous waste or (2) the combined activity of collecting and/or hauling of hazardous waste materials within a local area and operating treatment or disposal facilities for hazardous waste."

WASTE TYPES	ESTIMATED ANNUAL* QUANTITY OF WASTE (TONS)
Reactivity	NA
Toxicity	NA
Ignitable	NA
Corrosivity	NA
F-listed	NA
K-listed	NA
P-listed	NA
U-listed	NA

*See Section 2.0 for maximum storage capacity.

2.0 ESTIMATED MAXIMUM AMOUNT OF EACH HAZARDOUS WASTE THAT MAY BE PRESENT AT ANY ONE TIME

Storage Facilities	Existing Capacity (gallons unless otherwise noted)
Container Storage Units 1-6	953,734
Tanks	696,000
Truck Stations 3, 4, and 5	267,422

3.0 HAZARDOUS WASTES REQUIRING UNIQUE/SPECIAL TREATMENT

None.

4.0 LOCATION OF HAZARDOUS WASTES

Container Storage Units 1-6, Various Tanks throughout the facility, and Truck Stations 3, 4, and 5. Please note that the volumes in Section 2.0 are maximum capacities. In practice, the facility typically has less than one-third of this volume on-site at any given time.

See **Exhibit 1**.

BEST TO GET TO THE FACILITY AND ALSO EVACUATE CITIZENS AND WORKERS

See **Exhibit 2**.

6.0 LOCATION OF WATER SUPPLY FOR FIRE FIGHTING

The facility has a foam system for fire-fighting. In addition, fire hydrants are located at various places along the facility perimeter to provide fire water for remote areas of the site. See **Exhibit 3**.

7.0 IDENTIFICATION OF ON-SITE NOTIFICATION SYSTEMS

Telephone System/Cell Phones

The facility's communication system is an extensive telephone network. Further communications between facility personnel may be achieved through cell phones which are issued to key personnel.

Emergency fire alarms notify both on-site personnel and the local fire department of a fire.

8.0 NAME OF EMERGENCY COORDINATOR(S) AND 24/7 EMERGENCY TELEPHONE NUMBER(S)

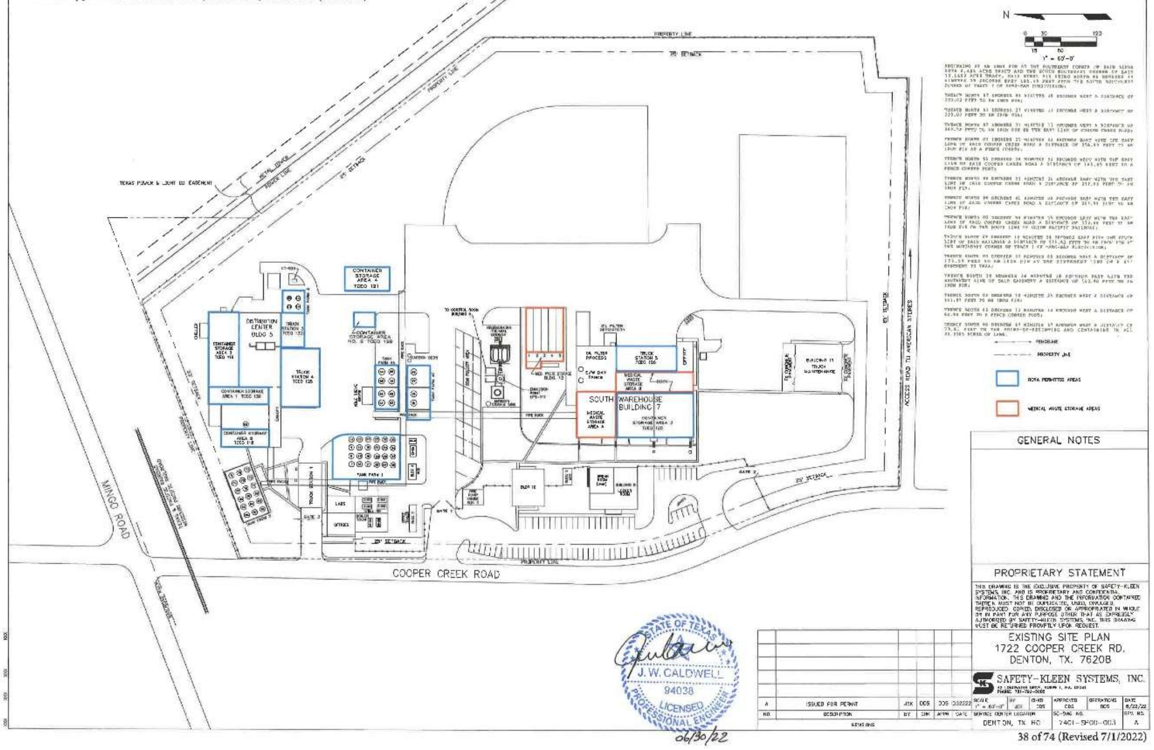
The Emergency Coordinator is responsible for deciding when to implement the Contingency Plan and for directing the emergency response procedures once the Contingency Plan is activated. The Incident Command System includes a Primary Emergency Coordinator and alternate coordinators who assume responsibility if the primary coordinator is not available. At all times, there is an employee on-site or on call who can function as the Emergency Coordinator. He/she is familiar with all aspects of the Contingency Plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of records, and the facility layout. The Emergency Coordinator has the authority to commit necessary resources to implement the Contingency Plan.

NAME	SERVE AS	CONTACT NUMBER
Jon Wingert	Primary Emergency Coordinator	Work: 940-483-5255 Cell: 469-416-7850
Sherry Watson	Alternate Emergency Coordinator	Work: 940-483-5219 Cell: 940-435-3726
Brandon Wallace	Alternate Emergency Coordinator	Work: 940-735-3709 Cell: 940-268-9774

EXHIBIT 1

Locations of Hazardous Waste

Initial Application Submittal Date (10/27/2021) Revision 3 (7/1/2022)



38 of 74 (Revised 7/1/2022)

EXHIBIT 2

Area Map

Google Maps Safety-Kleen Systems

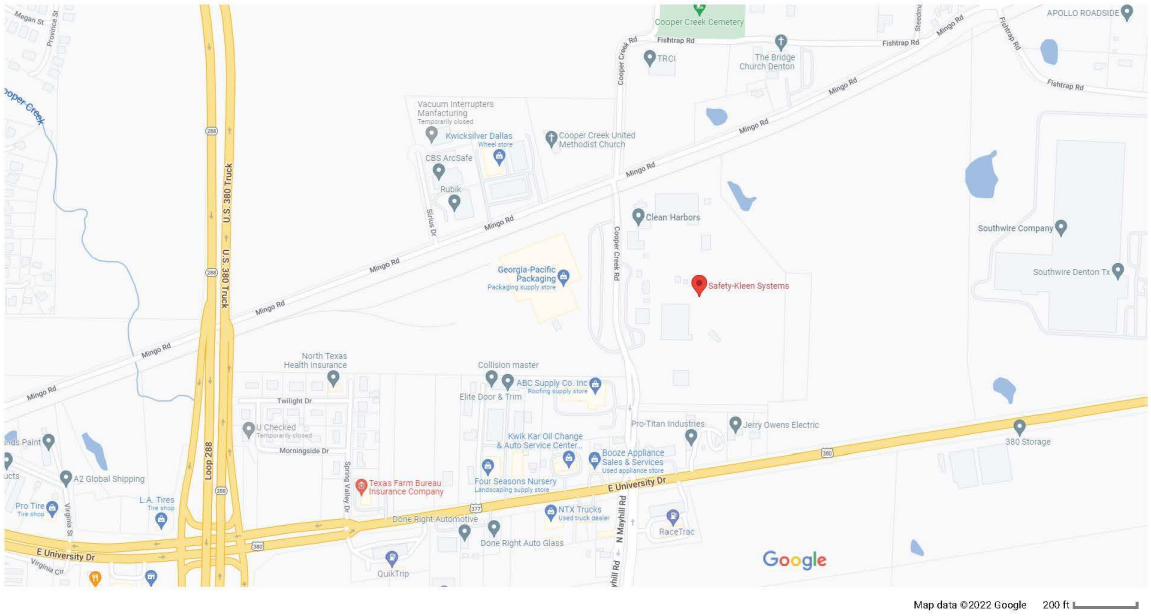
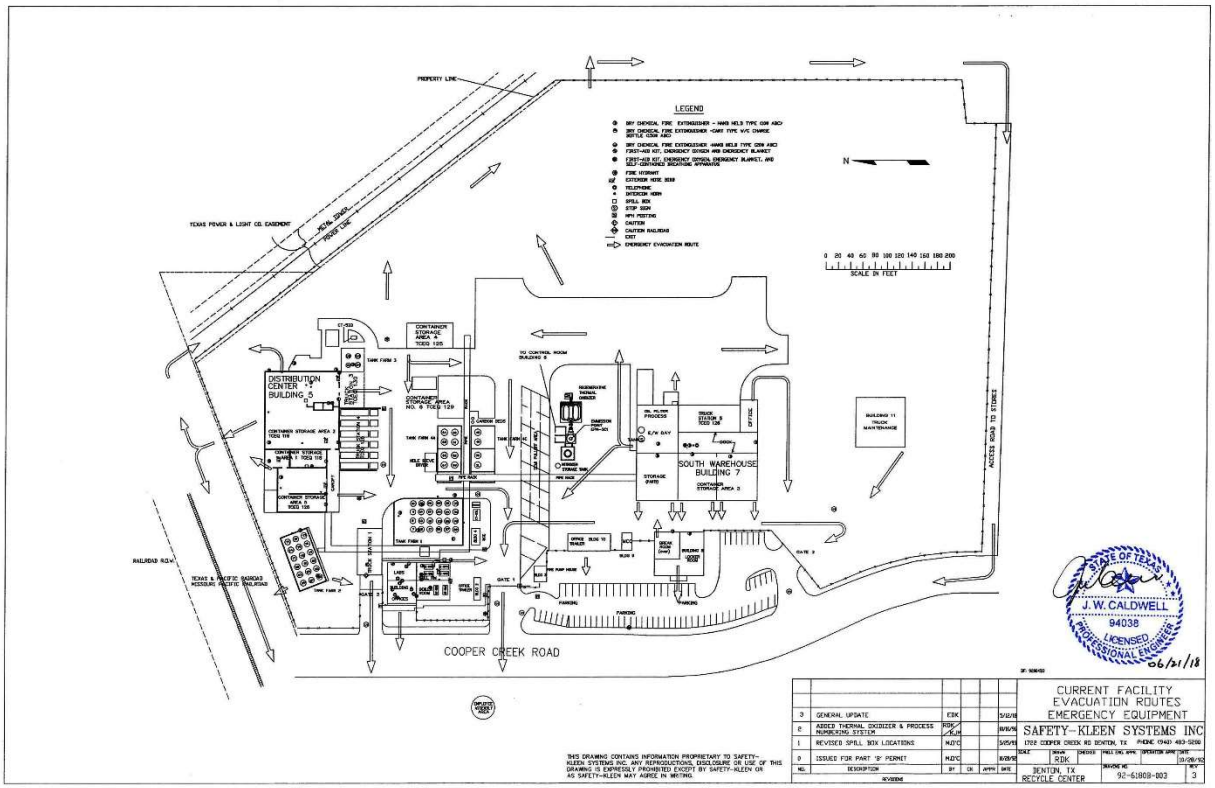


EXHIBIT 3

Evacuation Routes and Location of Fire-fighting Water Sources


LEGEND
PROPERTY LINE
TEXAS PEVER & LIGHT CO. EASEMENT
RAILROAD R.O.W.
TEXAS & PACIFIC RAILROAD
MISSOURI PACIFIC RAILROAD
DISTRIBUTION CENTER 1 & BUILDING 5
SOUTH WAREHOUSE BUILDING 7
ACCESS ROAD TO STORES
COOPER CREEK ROAD
SCALE IN FEET
J. W. CALDWELL
94038
LICENSED PROFESSIONAL ENGINEER
06/21/18
CURRENT FACILITY EVACUATION ROUTES EMERGENCY EQUIPMENT
SAFETY-KLEEN SYSTEMS INC
1722 COOPER CREEK RD BENTON, TX
3 GENERAL UPDATE
2 ADDED THERMAL OXIDIZER & PROCESS NUMBERING SYSTEM
1 REVISED SPILL BOX LOCATIONS
0 ISSUED FOR PART 'B' PERMIT
BENTON, TX
RECYCLE CENTER
92-61808-003
3

Section III. – Appendix III.E (CONTINGENCY PLAN)

This Contingency Plan for the Safety-Kleen Systems, Inc. - Denton Recycle Center is prepared in accordance with the requirements of 40 CFR 264 Subpart D and 40 CFR 264.37. The intent of Subpart D (Contingency Plan and Emergency Procedures) is to ensure that facilities that treat, store, or dispose of hazardous wastes have established the necessary planned procedures to follow in the event an emergency situation should arise.

This Contingency Plan describes procedures in place at the Denton Recycle Center to minimize the possibility of an emergency situation. The Plan also provides response procedures to be implemented in emergencies 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." The Contingency Plan is implemented by the Emergency Coordinator in the event of a fire, explosion, or release of hazardous waste, which could threaten human health or the environment.

It is necessary to amend the plan if:

- The applicable regulations are revised;
- The plan fails in an emergency;
- The facility design, construction or operation changes significantly;
- The list of emergency personnel changes; or
- The inventory or location of emergency equipment changes.

This plan is prepared in a format such that the information may be easily updated and photocopied for educational purposes. This Plan or revisions to the Plan are to be kept at the facility and regularly updated throughout the operating life of the facility. Copies are also provided to local authorities and emergency teams that may be called upon to provide emergency service. The most current Contingency Plan is always available on site **and provided to local authorities**.

Any questions concerning this plan should be directed to the Facility Manager.

1.1 FACILITY DESCRIPTION

The Safety-Kleen - Denton Recycle Center location and telephone number are identified as the "business address and telephone number" for the Emergency Coordinators listed in Table 5-1. Exhibit 7 and 8 is a site plan of the existing and proposed facilities. These drawings show traffic flow, emergency equipment locations, and evacuation routes for both the existing and proposed facilities.

The facility receives spent organic chemicals from other Safety-Kleen facilities and from industrial and commercial customers. EPA hazardous waste codes for wastes received and handled at the facility are listed in Attachment 1. In addition, the facility handles non-hazardous wastes. Wastes are received at the facility in bulk tanker trucks and in smaller containers (e.g., 5 to 110 gallon drums). Reclaimed and processed solvents are transported offsite the same way, both containerized and in bulk.

The Denton Recycle Center stores hazardous waste for solvent recovery in tank farms and the container storage area prior to processing. Wastes obtained from Safety-Kleen customers are stored in the storage areas with a total capacity as follows:

Tanks: The maximum tank storage capacity for waste materials for the existing facility is approximately 575, 066 gallons.

Containers: The maximum containerized waste material on-site for the existing facility is approximately 599,366 gallons, equivalent to 10,897, 55-gallon equivalent drums.

1.2 EMERGENCY COORDINATORS

If an emergency situation develops at the facility, the discoverer will contact an Emergency Coordinator, or if more appropriate to the situation, will summon help from other employees, but the discoverer MUST make sure an Emergency Coordinator is contacted. The names, addresses, and telephone numbers of the Emergency Coordinator and designated alternates are listed in

Table 5-1. EPA will be notified of any changes in personnel serving as Emergency Coordinator; such changes constitute a Class 1 modification to the Contingency Plan. The Emergency Coordinators should be called in the order they are listed; the first person on the list is the designated primary Emergency Coordinator. At all times, the Emergency Coordinator or one of the designated alternates will be either at the facility or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time). All persons listed as Emergency Coordinators are thoroughly familiar with all aspects of the facility's Contingency Plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, Emergency Coordinators have authority to commit resources of the company to deal with hazardous waste management related emergencies at the facility.

1.3 IMPLEMENTATION OF THE CONTINGENCY PLAN

The decision to implement the Contingency Plan will be made by the Emergency Coordinator. The following information provides guidance to the Emergency Coordinator in making this decision:

A. Fire and/or Explosion

The Contingency Plan will be implemented due to fire or explosion if:

- The fire causes the release of toxic fumes.
- The fire could spread to other locations, thereby, possibly igniting materials on-site or off-site, or could cause heat-induced leaks or explosions.
- The use of either water or foam fire suppressants could result in contaminated runoff.
- An explosion does or could:
  - result in danger from flying fragments or shock waves;
  - ignite other materials at the facility or otherwise cause the release toxic materials.
- The fire or explosion endangers human health for any other reason.

B. Spills or Material Release

The Contingency Plan will be implemented due to a spill or material release if:

- The spill could release toxic or flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- The spill could result in off-site or on-site soil contamination and/or ground or surface water contamination.
- The spill endangers human health or the environment for any other reason.
- The potential exists for incompatible materials to come into contact.

C. Floods

The Contingency Plan will be implemented if, due to the unlikely event of flooding, the potential exists that continued normal operation is not possible without the threat of compromising human safety or endangering the environment.

D. Uncontrolled Emergency

The Contingency Plan will be implemented in the event of a large incident at the facility that results in an off-site impact either through vapors, runoff, or actual off-site migration of regulated materials.

When the decision is made to implement the Contingency Plan, the Emergency Coordinator or designee will direct or carry out the directions outlined in the remaining sections of this plan, which describe procedures, emergency equipment, coordination agreements, and evacuation plan.

1.4 EMERGENCY RESPONSE PROCEDURES

Pursuant to the requirements of 40 CFR 264.51, the Denton Recycle Center follows the Emergency Response Procedures outlined herein.

A. Notification - In the event of an imminent or actual emergency situation, the Emergency Coordinator or designee is to be notified first and will determine whether the Contingency Plan is to be implemented. If it is, the Emergency Coordinator or designee will subsequently make or direct immediate notification of appropriate off-site authorities.

1. The emergency coordinator or the designee will activate internal facility communication systems to notify all facility personnel; and

2. The Denton Recycle Center's pull alarm system, if necessary, will be activated. The alarm system or the fire sprinkler system, if activated, will automatically notify the City of Denton Fire Department.

If it is decided that the Contingency Plan does not have to be implemented, the Emergency Coordinator will ensure that all necessary response action is taken; that the Safety-Kleen Department of Environment, Health and Safety is notified; and that an incident report is completed. An example of the incident report typically used is provided in Attachment 2.

B. Identification of Hazardous Wastes

1. The Denton Recycle Center maintains a daily inventory system that contains:

   a. Type, amount, and variety of waste; and
   b. Location of waste (The inventory system specifies the tanks by number and container storage areas where the materials are stored). **The inventory system is available to the Fire Department from the Safety-Kleen Environmental Department.**

2. Appropriate waste handling practices at the facility are followed at all times. For example, bulk materials are loaded/unloaded from trucks into specific storage tanks at designated truck stations. The containerized materials are stored in the designated area and then moved to a drum emptying area where they are pumped into designated tanks or into trucks for transferring to process units.

3. The Denton Recycle Center maintains and has access to current copies of Safety Data Sheets (SDS) of all the chemicals managed at the facility. The SDS contains physical, chemical and health related information for each chemical compound it

identifies. Safety-Kleen's Environmental, Health and Safety Department maintains the latest SDS sheets for all the chemicals through a third party vendor, in order to access any emergency situation and to direct proper response action.

C. Assessment - The Emergency Coordinator will assess possible hazards to human health or the environment that may result from the emergency situation and determine whether the Contingency Plan should be implemented. The emergency coordinator will consider the type of chemical and amount of chemical(s) involved in the incident, hazards associated with the chemical(s) in assessing the emergency situation. In addition, the prevailing weather condition will be taken into consideration.

The local emergency response teams will be contacted in case of emergencies. The emergency coordinator and the local emergency response teams will evaluate the emergency situation as described above and determine whether evacuation of local areas are required. The evacuation, if necessary, will be coordinated with the local police and fire departments, and the State Emergency Response Commission. **The** City of Denton **Police and** Fire Departments will have the ultimate authority to require an evacuation out side of the Denton Recycle Center property.

If the Contingency Plan must be implemented, the Emergency Coordinator will initiate the following procedures:

A. During an emergency, the Emergency Coordinator shall undertake all reasonable measures necessary to ensure that fires, explosions, and discharges do not occur, recur, or spread to other hazardous material at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

B. If the facility ceases operations in response to a fire, explosion, or discharge, the Emergency Coordinator ensures the monitoring of leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or the equipment, wherever this is appropriate.

C. Immediately after an emergency, the Emergency Coordinator will provide for treating, storing, or disposing of recovered materials, contaminated soil or surface water, or any other material that results from a discharge, fire, or explosion at the facility.

D. If the facility ceased operation in response to an emergency, the Emergency Coordinator must notify the State Emergency Response Office and appropriate local authorities that the following have been complied with, in accordance with 40 CFR 264.56(i):

1. No waste that may be incompatible with the released material is treated, stored, or disposed of at the facility until clean-up procedures are completed; and
2. All emergency equipment listed in this Contingency Plan (see Table 5-3) is cleaned and fit for its intended use prior to resuming normal operations.

These requirements must be met before operations are resumed in the affected area(s) of the facility. In addition, emergency equipment, materials, and supplies will be replenished to pre-emergency levels.

1.5 EMERGENCY SPILL CONTROL

A. Emergency Spill Control Procedures

1. If process equipment/systems are involved and the spill necessitates shut down, the facility proceeds with the shutdown providing it can be done without putting personnel at risk.

2. If necessary, the alarm system will be activated and the affected building **will be** evacuated.

3. The spill will be reported to all required agencies as well as internally within Safety-Kleen.

4. Treat the injured, and summon emergency medical services (ambulance), if necessary, by dialing 911.

5. Notify the Emergency Coordinator (refer to Table 5-1) and, with direction and assistance from the Safety-Kleen Department of Environment, Health and Safety, notification may include:

   - National Response Center,
   - Texas Commission on Environmental Quality Office, and
   - Community Emergency Coordinator and the State Emergency Response Commission when EPA-designated reportable quantities of Extremely Hazardous Substances are released (SARA, Title III requirement).

6. If the spill/leak is small, take action to stop, contain, or slow the flow of liquid. This action should only be attempted by trained personnel wearing appropriate chemical protective gear.

7. Provide information to the Fire Department, upon their arrival, concerning the spilled material(s).

8. Trained personnel wearing appropriate protective gear may conduct air monitoring, if necessary, to identify hazardous vapor concentrations in the area. Off-site evacuation of the public should be considered by the Emergency Coordinator and local government officials.

9. If the spilled liquid is flammable, take appropriate precautions to prevent ignition of vapors.

10. Efforts to contain the spill should be initiated or continued if applicable. For spills occurring at the truck stations, tank farms, or container storage area,

spilled waste material will normally be contained within the secondary containment system. Leaking containers should be plugged, patched, off-loaded, or overpacked (the latter applies to small containers and drums), as appropriate, to stop the release of liquid into the area. This action should only be attempted by trained personnel wearing appropriate chemical protective gear.

11. Pump large amounts of contained chemicals to drums or tanks for disposal or, if applicable, on-site processing. Small quantities of chemicals can be absorbed and placed in drums for disposal. This action should only be attempted by trained personnel wearing appropriate chemical protective gear.

12. Clean all contaminated surfaces, including tanks, containment structures, containers, and ancillary equipment. Cleanup personnel must wear appropriate protective gear.

13. Decontaminate all response personnel, protective gear, equipment and apparatus. Wearing of appropriate protective gear is required during decontamination operations.

B. Post Incident Procedures and Equipment Maintenance

Every spill is recorded by the Emergency Coordinator or designee. In the event of an emergency situation, the emergency response procedures and the contingency plan, if warranted, that are described in this section would be implemented. After the emergency situation is mitigated, all emergency equipment and supplies will be inventoried and replenished. Equipment used during the emergency will be inspected and serviced, and the fire extinguishers will be replaced or recharged. This procedure will help maintain preparedness for future emergency situations.

1.6 FIRE CONTROL PROCEDURES

1. If the fire is small **(a fire that can be safely extinguished with a portable fire extinguisher)**:

    a. Act quickly with an appropriately-rated fire extinguisher to limit the spread of fire, in accordance with fire suppression training; while

    b. A second person activates the facility fire alarm **which automatically summons** the Fire Department.

    c. If processing equipment/systems are involved, shut them down if such action can be done without putting personnel at risk.

    d. Fire Department ensures extinguishment of the fire.

2. If the fire is large **(a fire that can not be safely extinguished with a portable fire extinguisher)**:

    a. Activate the facility fire alarm system, including the AFFF Foam fire suppression system if necessary, by pulling foam station and/or activating and pointing the foam/water hydrant nozzles, and evacuate the entire facility.

    b. Report the fire to the Fire Department.

    c. Treat the injured, and summon emergency medical services (ambulance), if necessary.

    d. Report the fire to the Emergency Coordinator (refer to Table 5-1).

    e. Notify the applicable regulatory agencies, as appropriate.

f. Provide information to the Fire Department, upon their arrival, concerning the material(s) involved in the fire and those nearby the fire area.

g. Fire Department will perform any rescues and control the fire. In the event of a fire in a container storage area, access aisles are present to permit passage of firefighters and their equipment.

h. During fire suppression operations, efforts **will** be taken to contain the fire suppressant and prevent runoff from entering storm drains, drainage ditches, and waterways.

i. During and after the fire, trained personnel may conduct air monitoring (from a safe distance and while wearing proper protective clothing) to identify hazardous vapor concentrations in the area. Off-site evacuation of the public **will** be considered by the local government officials.

j. After the fire is controlled and it is deemed safe to attempt, enter the affected building or area to assess damage and to determine the condition of hazardous waste containers, tanks, and other affected equipment. This action **will** only be undertaken by trained personnel wearing proper protective gear and while under the protection of a charged hoseline.

k. Any leaking tanks, pipes, containers, or other equipment **will** be plugged, patched, off-loaded, or overpacked (the latter applies to small containers and drums), as appropriate, to stop the release of liquid into the area. Contain any spilled wastes and segregate them from fire suppression runoff, if possible. Only trained and properly clothed personnel **will** attempt these actions.

1. Pump large amounts of contained chemicals and runoff to drums or tanks for disposal or, if applicable, on-site processing. Small quantities of chemicals and runoff can be absorbed and placed in drums for disposal. This action **will** only be attempted by trained personnel wearing proper protective gear.

m. Clean all contaminated surfaces including tanks, containment structures, containers, and ancillary equipment. Cleanup personnel must wear appropriate protective gear.

n. Decontaminate all response personnel, equipment, protective gear, and apparatus. Wearing of appropriate protective gear is required during decontamination operations.

o. Prepare appropriate records and documentation.

3. Post Incident Procedures and Equipment Maintenance

Every incident involving waste materials are recorded by the Emergency Coordinator or designee. In the event of an emergency situation, the emergency response procedures and the contingency plan described in this section would be implemented. After the emergency situation is mitigated, all emergency equipment and supplies will be inventoried and replenished. Equipment used during the emergency will be inspected and serviced, and the fire extinguishers will be replaced or recharged. This procedure will help maintain preparedness for future emergency situations.

1.7 FLOODS

None of the hazardous waste management activities at the Denton Recycle Center are located within the 100 year flood plain; therefore, floods exceeding this level will be dealt with on a case-by-case basis.

1.8 FACILITY EVACUATION PLAN

A. **In an emergency, all on-site personnel are to be evacuated from the facility using evacuation routes illustrated in the Current Emergency Equip/Evac and Proposed Emergency Equip/Evac facility drawings, attached below**. The facility paging system will be used to notify all the recycle plant areas. The telephone intercom

system will be used to notify the service center operation. In addition, the phone extension system can be used for internal communication throughout the site. Process operators are trained in the emergency shutdown of process units and pumps. Each process must always be shut down before the evacuation UNLESS this would endanger personnel safety. During evacuation, a check must be made to ensure that all personnel are accounted for and out of the danger area.

The local police and fire departments will be responsible for evacuating the people in the community during emergencies. **In the event of a reportable hazardous materials release, the scope and extent of the environmental investigation (if any) will be decided by the environmental agencies.**

On-site building and plant evacuation routes and assembly areas are illustrated in Exhibit 7. The primary assembly area is located directly west of the main office building on Cooper Creek Road. In the event that the wind or other reasons preclude this location, a second assembly area to the southwest of the facility, in the parking lot of the convenience store located at the intersection of Cooper Creek Road and Highway 380, has been established. **Facility employees receive training and participate in evacuation drills annually.**

B. Each supervisor will count his or her people in the assembly area to be sure everyone is accounted for. Facility visitors and contractors will be accounted for by the Emergency Coordinator.

1.9 EMERGENCY EQUIPMENT

The facility maintains a significant amount of safety and emergency equipment. This equipment includes fire extinguishers, personal protective equipment, eye wash/emergency shower stations, first aid kits, portable pumps, absorbent materials, and hand tools. Table 5-3 is a detailed list of the emergency equipment at the facility and their location. Locations of emergency equipment also shown in Exhibit 7.

Appropriate personnel at the facility are trained in the proper and effective use of safety and emergency equipment. They are also instructed to maintain an awareness of the location of the nearest available equipment. **Facility employees receive training on the use/operation of the safety/emergency equipment, including the fire suppression system, annually.**

1.10 RECORDKEEPING AND REPORTING

Emergencies, spills, or other incidents requiring implementation of the Contingency Plan are recorded and maintained as part of the operating record. A spill, if of a minor or controllable nature, will not necessarily require implementation of the Contingency Plan. The Emergency Coordinator will determine if the incident warrants Contingency Plan implementation.

Within 15 days of full implementation of the Contingency Plan, a written report of the event will be submitted to the Texas Commission on Environmental Quality and will include:

1. Name, address and phone number of owner or operator;
2. Name, address and phone number of facility;
3. Date, time and type of incident;
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. Assessment of actual or potential hazards to human health or to the environment, where this is applicable; and
7. The estimate of quantity and disposition of hazardous material that resulted from the incident.

1.11 PREPAREDNESS AND HAZARD COMMUNICATION

It is essential that the Denton Recycle Center personnel be prepared to effectively prevent and also respond to emergency situations. Personnel are trained to recognize and prevent potential emergency situations, and are ready and prepared for such situations, so that minor incidents will not become major emergencies.

The facility has identified the most likely types of incidents and emergencies. The most likely occurrence in an operation as the one at the Denton Recycle Center is a solvent spill. The most likely situations where a spill would occur include:

a. Bulk loading or unloading operations;
b. Handling of containers;
c. Leaking hoses, pipes or vessels; and
d. Leaking containers in storage or in transport vehicles.

The facility operating procedures are oriented toward awareness of potential problem situations and their prevention. Requirements, such as smoking only in designated areas, wearing personal protective equipment, and inspecting the facility frequently, are included in the facility's preventive measures. Details of inspections are covered in the Inspection Plan (see Section 6.0).

Personnel awareness of the materials handled at the facility is required by OSHA and is of prime importance. Material Safety Data Sheets for the chemicals handled on-site are made available to the employees, who are trained in their use. Further, each employee is trained in proper handling of the materials and hazards associated with them.
Each new employee undergoes a comprehensive training program that includes emergency training. Refresher training is also done on an annual basis. Details of training are covered in the Training Plan in Section 7.0 of this application.

1.12 ARRANGEMENTS WITH LOCAL AUTHORITIES

The requirements of 40 CFR 264.37(a)(l) call for the facility to make arrangements to "familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of the hazardous waste handled at the facility, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes." Further, 40 CFR 264.37(a)(4) requires that the facility "familiarize local hospitals with the properties of hazardous wastes handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility."

To fulfill this responsibility Safety-Kleen has sent an initial copy of the Contingency Plan to the Denton police and fire departments, as well as local hospitals, and invited them to visit the plant and discuss its operation in more detail. Each agency will be notified of any subsequent changes made to the Plan at a minimum annually.

ATTACHMENT 1

EPA WASTE CODES RECEIVED AND MANAGED

Waste No.	Description of Hazardous Waste
D001	Solid waste that exhibits the, characteristic of ignitability, but is not listed as a hazardous waste
D002	Solid waste that exhibits the characteristic of corrosivity, but is not listed as a hazardous waste.
D003	Solid waste that exhibits the characteristic of reactivity, but is not listed as a hazardous waste

The following solid wastes exhibiting the characteristic of TCLP for:

D004	Arsenic at 5.0 mg/1 or more
D005	Barium at 100 mg/1 or more
D006	Cadmium at 1.0 mg/1 or more
D007	Chromium at 5.0 mg/l or more
D008	Lead at 5.0 mg/l or more
D009	Mercury at 0.2 rag/1 or more
D010	Selenium at 1.0 mg/1 or more
D011	Silver at 5.0 rag/1 or more
D012	Endrin at 0.02 mg/l or greater
D013	Lindane at 0.40 rag/1 or greater
D014	Methoxychlor at 10.0 mg/1 or greater
D015	Toxaphene at 0.50 rag/1 or greater
D016	2,4-D at 10.0 mg/l or greater
D017	2,4,5-TP (silvex) at 1.0 rag/1 or greater
D018	Benzene at 0.5 mg/I or greater
D019	Carbon tetraehloride at 0.5 rag/1 or greater
D020	Chlordane at 0.03 rag/1 or greater

Waste No.	Description of Hazardous Waste
D021	Chlorobenzene at 100.0 mg/l or greater
D022	Chloroform at 6.0 mg/1 or greater
D023	O-Cresol at 200 mg/l or greater
D024	M-Cresol at 200 mg/1 or greater
D025	P-Cresol at 200 mg/1 or greater
D026	Cresol at 200 rag/1 or greater
D027	1,4-dichlorobenzene at 7.5 rag/1 or greater
D028	1,2-dichlorobenzene at 0.5 rag/1 or greater
D029	1,1-dichloroethylene at 0.7 rag/1 or greater
D030	2,4-dinitrotoluene at 0.13 mg/1 or greater
D031	Heptachlor (and its epoxide) at 0.008 mg/1 or greater
D032	Hexachlorobenzene at 0.13 rag/1 or greater
D033	Hexachlorobenzene at 0.13 mg/l or greater
D034	Hexachlroethane at 3.0 mg/l or greater
D035	Methyl ethyl ketone at 200 mg/l or greater
D036	Nitrobenzene at 2.0 mg/1 or greater
D037	Pentachlorphenol at 100 rag/1 or greater
D038	Pyridine at 5.0 rag/1 or greater
D039	tetrachlroethylene at 0.7 mg/1 or greater
D040	Trichloroethylene at 0.5 mg/l or greater
D041	2,4,5-trichlorophenol at 400 mg/l or greater
D042	2,4,6-trichloroephenol at 2.0 mg/1 or greater
D043	Vinyl chloride at 0.2 mg/l or greater

Waste No.	Description of Hazardous Waste
F001	The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, 1, l,l-trichloroethane, carbon tetrachloride, chlorinated fluorocarbons, spent solvent mixtures/blends used in degreasing, and still bottom from the recovery of these spent solvents and spent solvent mixtures.
F002	The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-triichloroethane, chlorobenzene, 1,1,2-triichloro-l,2,2-trifiuoroethane, orthodichlorobenzene, trichlorofiuoromethane, 1,1,2-trichloroethane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F003	The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyI ketone, n-buryl alcohol, cyclohexanone, methanol, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F004	The following spent non-halogenated solvents: cresols and cresylic acid, nitrobenzene, spent solvent mixtures and blends, and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F005	The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, 2-nitropropane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures,
F006	Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or fine-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum.
F007	Spent cyanide plating bath solutions from electroplating operations.
F008	Plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process.
F009	Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.
F010	Quenching bath residues from oil baths from metal heat treating operations where cyanides are used in the process.
F011	Spent cyanide solutions from salt bath pot cleaning from metal heat treating operations.

Waste No.	Description of Hazardous Waste
F012	Quenching waste water treatment sludges from metal heat treating operations where cyanides are used in the process.
F019	Wastewater treatment sludges from the chemical conversion coating of aluminum except from zirconium phosphating in aluminum can washing when such phosphating is an exclusive conversion coating process.
F024	Wastes, including but not limited to, distillation residues, heavy ends, tars, and reactor clean-out wastes from the production of chlorinated aliphatic hydrocarbons.
F025	Condensed light ends, spent filters and filter aids, and spent desiccant wastes from the production of certain chlorinated aliphatic hydrocarbons, be 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.
F032	Wastewaters, process residuals, preservative drippage and spent formulations from wood preserving processes generated at plants that currently use or have previously used chlorophenolic formulations (except potentially cross-contaminated wastes that have had the F032 waste code deleted in accordance with Section 721.135 and where the generator does not resume or initiate use of chlorophenolic formulations). This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote or pentachlorophenol.
F034	Wastewaters, process residuals, preservative drippage and spent formulations from wood preserving processes generated at plants that use creosote formulations. This listing does not include KO01 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote or pentachlorophenol.
F035	Wastewaters, process residuals, preservative drippage and spent formulations from wood preserving processes generated at plants that use inorganic preservatives containing arsenic or chromium. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote or pentachlorophenol.
F037	Petroleum refinery primary oil/water/solids separation sludge.
F038	Petroleum refinery secondary (emulsified) oil/water/solids separation sludge.
F039	Leachate resulting from the storage, treatment or disposal of hazardous wastes.

Waste No.	Description of Hazardous Waste
K001	Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.
K002	Wastewater treatment sludge from the production of chrome yellow and orange pigments.
K003	Wastewater treatment sludge from the production of zinc yellow pigments.
K004	Hexavalent chromium
K005	Wastewater treatment sludge from the production of chrome green pigments.
K006	Wastewater treatment sludge from the production of chrom oxide green pigments (anhydrous and hydrated).
K007	Wastewarer treatment sludge from the production of iron blue pigments.
K008	Oven residue from the production of chrome oxide green pigments.
K009	Distillation bottoms from the production of acetaldehyde from ethylene.
K010	Distillation side cuts from the production of acetaldehyde from ethylene.
K011	Bottom stream from the wastewater stripper in the production of acrylonitrile.
K013	Bottom stream from the acetonitrile column in the production of acrylonitrile.
K014	Bottoms from the acetonitrile purification column in the production of acrylonitrile.
K015	Still bottoms from the distillation efbenzyl chloride.
K016	Heavy ends or distillation residues from the production of carbon tetrachloride.
K017	Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin.
K018	Heavy ends from the fractionation column in ethyl chloride production.
K019	Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.
K020	Heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production.
K021	Aqueous spent antimony catalyst waste from fiuoromethanes production.
K022	Distillation bottom tars from the production of phenol/acetone from cumene.

Waste No.	Description of Hazardous Waste
K023	Distillation light ends from the production of phthatic anhydride from naphthalene.
K024	Distillation bottoms from the production of phthalic anhydride from naphthalene.
K025	Distillation bottoms from the production of phthalic anhydride from naphthalene.
K026	Stripping still tills from the production of methyl ethyl pyridines.
K027	Toluene diisocyanate, toluene-2, 4-diamine.
K028	Spent catalyst from the hydrochlorinator reactor in the production of 1,1,1-trichlorethane.
K029	Waste from the product steam stripper in the production of 1,1,-trichloroethane.
K030	Column bottoms or heavy ends from the combined production of trichloroethylene and perchloroethylene.
K031	By-product salts generated in the production of MSMA and cacodylic acid.
K032	Wastewater treatment sludge from the production of chlordane.
K033	Wastewater and scrub water from the chlorination of cyctopentadiene in the production of chlordane.
K034	Filter solids from the filtration of hexachlorocyclopentadiene in the production of chlordane.
K035	Wastewater treatment sludges generated in the production of creosote.
K036	Still bottoms from toluene reclamation distillation in the production of disulfoton.
K037	Wastewater treatment sludges from the production of disulfoton.
K038	Wastewater from the washing and stripping of phorate production.
K039	Filter cake from the filteration of diethytphosphorodithioic acid in the production of phorate.
K040	Wastewater treatment sludge from the production of phorate.
K041	Wastewater treatment sludge from the production of toxaphene.

Waste No.	Description of Hazardous Waste
K042	Heavy ends or distillation residues from the distillation of tetrachlorobenzene in the production of 2,4,5-T.
K043	2,6-Dichlorophenol waste from the production of 2,4-D.
K046	Wastewater treatment sludges from the manufacturing, formulation and loading of lead based initiating compounds.
K048	Dissolved air flotation float from the petroleum refining industry.
K049	Slop oil emulsion solids from the petroleum refining industry.
K050	Heat exchanger bundle cleaning sludge from the petroleum refining industry.
K051	API separator sludge from the petroleum refining industry.
K052	Tank bottoms (leaded) from 'the petroleum refining industry.
K060	Ammonia still lime sludge from cooking operations
K061	Emission control dust/sludge from the primary production of steel in electric furnaces.
K062	Spent pickle liquor generated by steel finishing operations of facilities within the iron and steel industry (SIC Codes 331 and 332).
K064	Acid plant blowdown slurry/sludge resulting from the thickening of blowdown slurry from primary copper production.
K065	Surface impoundment solids contained in and dredged from surface impoundments at primary lead smelting facilities.
K06 6	Sludge from treatment of process wastewater and/or acid plant blowdown from primary zinc production.
K069	Emission control dust/sludge from secondary lead smelting.
K071	Brine purification muds from the mercury cell process in chlorine production, where separately pre-purified brine is not used.
K073	Chlorinated hydrocarbon waste from the purification step of the diaphram cell process using graphite anodes in chlorine production°
K083	Distillation bottoms from aniline production.

Waste No.	Description of Hazardous Waste
K084	Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.
K085	Distillation or fractionation column bottoms from the production of chlorobenzene.
K086	Solvent washes and sludges, caustic washes and sludges or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps and stabilizers containing chromium anti lead.
K087	Decanter tank tar sludge from coking operations.
K088	Spent potliners from primary aluminum reduction.
K090	Emission control dust or sludge from ferrochromiumsilicon production.
K091	Emission control dust or sludge from ferrochromium production.
K093	Distillation light ends from the production of phthalic anhydride,, from ortho xylene.
K094	Distillation bottoms from the production of phtbalic anhydride from ortho-xylene.
K095	Distillation bottoms from the production of 1,1,1-triehloroethane.
K096	Heavy ends from the heavy ends column from the production of 1,1,1-trichloroethane.
K097	Vacuum stripper discharge from the chlordane chlorinator in the production of chlordane.
K098	Untreated process wastewater from the production of toxaphene.
K099	Untreated wastewater from the production of 2,4-D.
K100	Waste leaching solution from acid leaching of emission control dust/sludge from secondary lead smelting.
K101	Distillation tar residues from the distillation of aniline-based compounds in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

Waste No.	Description of Hazardous Waste
K102	Residue from the use of activated carbon for decolorization in the production of veterinary pharmaceuticals from ars4enic or organo-arsenic compounds.
K103	Process residues from aniline extraction from the production of aniline.
K104	Combined wastewater streams generated from nitrobenzene/aniline production.
K105	Separated aqueous stream from the reactor product washing step in the production.
K106	Wastewater treatment sludge from the mercury cell process in chlorine production.
K107	Column bottoms from product separation from the production of 1,1-dimethylhydraz'me (UDMH) from carboxylic acid hydrazines.
K108	Condensed column overheads from product separation and condensed reactor vent gases from the production of 1,1-dimethylhydrazine (UMDH) from carboxylic acid hydrazines.
K109	Spent filter cartridges from product purification from the production of 1,1-dimethylhydrazine (UMDH) from carboxylic acid hydrazines.
K110	Condensed column overheads from intermediate separation from the production of 1,1-dimethylhydrazine (UMDH) from carboxylic acid hydrazines.
K111	Product washwaters from the production of dinitrotoluene via filtration of toluene.
K112	Reaction by-product water from the drying column in the production to toluenediamine via hydrogenation of dinitrotoluene.
K113	Condensed liquid light ends from the (T) purification of toluenediamine in the production of toluenediamine via hydrogenation dinitrotoluene.
K114	Vicinals from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.
K115	Heavy ends from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.
K116	Organic condensate from the solvent recovery column in the production of toluene diisocyanate via phosgenation of toluenediam'me.

Waste No.	Description of Hazardous Waste
K117	Wastewater from the reactor vent gas scrubber in the production of ethylene dibromide via bromination of ethane.
K118	Spent absorbent solids from purification of ethylene dibromide in the production of ethylene dibromide via bromination of ethene.
K123	Process wastewater (including supernates, filtrates, and wash waters) from the production of ethylenebisdithiocarbamie acid and its salts.
K124	Reactor vent scrubber water from the production of ethylene-bisdithiobarbamic acid and its salts.
K125	Filtration, evaporation, and centrifugation of solids from the production of ethylenebisdithio carbonic acid and its salts.
K126	Baghouse dust and floor sweepings in milling and packaging operations from production or formulation of ethylenebisdithiocarbamic acid and its salts.
K131	Wastewater from the reactor and spent sulfuric acid from the acid dryer from the production of methyl bromide.
K132	Spent absorbent and wastewater separator solids form the production of methyl bromidc.
K136	Still bottoms from the purification of ethylene dibromide in the production of ethylene dibromide via brornination of ethene.
K140	Floor sweepings, off-specification product and spent filter media from the production of 2,4,6-tribromophenol.
K141	Process residues from the recovery of coal tar, including, but not listed to, tax collecting sump residues from the production of coke from coal or the recovery of coke by-products produced from coal. This listing does not include K087 (decanter tank mr sludge from coking operations).
K142	Tar storage tank residues from the production of coke from coal or from the recovery of coke by-products produced from coal. This listing does not include K087 (decanter tank tar sludge from coking operations).
K143	Process residues from the recovery of light oil, including, but not limited to, those generated in stills, decanters, and wash oil recovery units from the recovery of coke by-products produced from coal.
K144	Wastewater treatment sludges from light oil refining, including, but not limited to, intercepting or contamination sump sludges from the recovery of coke by-products produced from coal.

Waste No.	Description of Hazardous Waste
K145	Residues from napthalene collection and recovery operations from the recovery of coke by-products produced from coal.
K147	Tar storage tank residues from coal tax refining.
K148	Residues from coal mr distillation, including, but not limited to, still bottoms.
K149	Distillation bottoms from the production of alpha- (or methyl-) chlorinated toluenes, ring-chlorinated toluenes, benzoyl chlorides, and compounds with mixtures of these functional groups. [This waste does not include still bottoms from the distillation 0fbenzyl chloride.]
K150	Organic residuals, excluding spent carbon adsorbent, from the spent chlorine gas and hydrochloric acid recovery processes associated with the production of alpha-(or methyl-) chlorinated toluenes, ring-chlorinated toluenes, benzoyl chlorides, and compounds with mixtures of these functional groups.
K151	Wastewater treatment sludges, excluding neutralization and biological sludges, generated during the treatment of wastewaters from the production of alpha- (or methyl-) chlorinated toluenes, ring-chlorinated toluenes, benzoyl chlorides, and compounds with mixtures of these functional groups.
K156	Organic waste (including heavy ends, still bottoms, light ends, spent solvents, filtrates, and decantates) from the production of carbamates and carbamoyl oximes.
K157	Wastewaters (including scrubber waters, condenser waters, washwaters, and separation waters) from the production of carbamates and carbamoyl oximes).
K158	Bag house dust, and filter/separation solids from the production of carbamates and carbamoyl oximes.
K159	Organics from the treatment of thiocarbamate wastes.
K160	Solids (including filter wastes, separation solids, and spent catalysts) from the production of thiocarbamates and solids from the treatment of thiocarbamate wastes.
K169	Crude oil storage tank sediment from the petroleum refining operations.
K170	Clarified slurry oil storage tanks sediments and/or in-line filter/separation solids from petroleum refining operations.
K171	Spent hydrotreating catalyst from petroleum refining operations, including guard beds used to desulfurize feeds to other catalytic units.

Waste No.	Description of Hazardous Waste
K172	Spent hydrorefming catalyst from petroleum refining operations, including guard beds used to desulfurize feeds to other catalytic units.
K174	Certain wastewater treatment sludges from the production of ethhylene dichloride or vinyl chloride monomer.
K175	Certain wastewater treatment sludges from the production of vinyl chloride monomer using mercuric chloride as a catalyst.
K176	Arsenic, Lead.
K177	Antimony.
K178	Thallium.

Discarded Commercial Chemical Products, Off-Specification Species, Container Residues, and Spill Residues Thereof:

P001	Warfarin, when present at concentrations greater than 0.3%.
P002	1-Acetyl-2-thiourea
P003	Acrolein
P004	Aldrin
P005	Allyl alcohol
P007	5-(Aminomethyl)-3 –isoxazolol
P008	4-Aminopyridine
P010	Arsenic acid
P011	Arsenic pentoxide
P012	Arsenic trioxide
P013	Barium cyanide
P014	Benzenethiol
P015	Beryllium dust
P016	Bis-chloromethyl) ether
P017	Bromoacetone
P018	Brucine
P020	Dinoseb
P021	Calcium cyanide
P022	Carbon bisulfide
P023	Chloroacetaldehyde
P024	p-Chloroaniline
P026	1-(o-Chlorophenyl) thiourea
P027	3-Chloropropionitrile
P028	Benzyl chloride
P029	Copper cyanides
P030	Cyanides (soluble cyanide salts) not elsewhere specified.
P031	Cyanogen
P033	Cyanogen chloride
P034	4,6-Dinitro-o-cyclohexylphenol

Waste No.	Description of Hazardous Waste
P036	Dichlorophenylarsine
P037	Dieldrin
P038	Diethylarsine
P039	Disulfoton
P040	O,O-Diethyl O-pyrazinyl phosphoro-thioate
P041	Diethyl-p-nitrophenyl phosphate
P042	1,2-Benzenediol, 4-[1-hydroxy-2-(methyl-amino)ethyl]
P043	Diisopropyl fluorophosphates
P044	Dimethoate
P045	Thiofanox
P046	Ethanamine, 1,10dimethyl-2-phenyl-
P047	4,6-Dinitro-o-cresol and salts
P048	2,4-Dinitrophenol
P049	2,4-Dithiobiuret
P050	Endosulfan
P051	Endrin
P054	Ethylenimine
P056	Fluorine
P057	Ftuoroacetamide
P058	Fluoroacetic acid, sodium salt
P059	Heptachlor
P060	Hexachlorohexahydro-endo, endo-dimethanonaphthalene
P062	Hexacthyl tctraphosphatc
P063	Hydrogen cyanide
P064	Methyl Isocyanate
P065	Mercury fulminate
P066	Methomyl
P067	2-Methylaziridine
P068	Methyl hydrazine
P069	2-Methyllactonitrile
P070	Aldicarb
P071	Methyl parathion
P072	alpha-Naphthylthiourea
P073	Nickel carbonyl
P074	Nickel cyanide
P075	Nicotine and salts
P076	Nitric oxide
P077	p-Nitroaniline
P078	Nitrogen dioxide
P081	Nitroglycerine
P082	N-Nitrosidunethylamine
P084	N-Nitrosomethylvinylamine
P085	Octamethytpyrophosphoramide
P087	Osmium oxide
P088	Endothall
P089	Parathion
P092	Phenylmercuric acetate
P093	N-Phenylthiourea
P094	Phorate

P095	Phosgene
P096	Phosphine
P097	Pamphur
P098	Potassium cyanide
P099	Potassium silver cyanide
P101	Propanenitrile
P102	Propargyl alcohol
P103	Selenourea
P104	Silver cyanide
P105	Sodium azide
P106	Sodium cyanide
P108	Strychnine and salts
P109	Tetraethyldithiopyrophosphate
P110	Tetraethyl lead
P111	Tetraethylpyrophosphate
P112	Tetranitomethane
P113	Thallic oxide
P114	Thallium(l) selenide
P115	Thallium(l) sulfate
P116	Thiosemicarbazide
P118	Trichloromethanethiol
P119	Vanadic acid, ammonium salt
P120	Vanadium pentoxide
P121	Zinc, cyanide
P123	Toxaphene
P127	7-Benzofuranol, 2,3-dihydro-2,2-dimethyl-, methylcarbamate
P128	PhenOl, 4-(dimethylamino)-3,5-dimethyl-, methylcarbamate (ester)
P185	1,3-Dithiolane-2-carboxaldehyde, 2,4-dimethyl-. 0-[(methylamino)carbonyl]oxime
P188	Benzoic acid, 2-hydroxy, compound with (3aS-cis)- 1,2,3,3a,8,8a-hexahydro-1,3a,8-tfimethylpyrrolo [2,3-b]indol-5-yl methylcarbamate ester (1:1)
P189	Carbamic acid, [(dibutylamino)thos]methyl-2,3 -dihydro-2,2-dimethyl-7-benzofuranyl ester Manganese dimethyldithiocarbamate
P190	Carbamic acid, methyl-, 3-methylphenyl ester
P 191	Carbamic acid, dimethyl-, 1- [dimethylamino carbonyl] -5-methyl- 1H-pyrazol-3 –yl ester
P 192	Carbamic acid, dimethyl-, 3-methyl- 1- (1-methylethyl)- 1Hpyrazol-5-yl ester
P 194	Ethanimidothioc acid, 2-(dimethylamino)-N-[(methylamino) carbonyl)oxy]-2-oxo-, methyl ester
P196	Manganese, bis(dimethylcarbamodithioato-S,S')-
P 197	Methanimidamide, N,N-dimethyl-N=- [2-methyl-4[[(methylamino)carbony]phenyl]-
P198	Methanimidamide, N,N-dimethyl-N=-[3-[(methylamino) carbonyl] oxylphnenyl] -, monohydrochloride
P199	Phenol, (3,5-dimethyl-4-(methylthio)-, methylcarbamate
P201	Phenol, 3-methyl-5-(!-methylethyl)-, methyl carbamate
P202	Phenol, 3-(1-methylethyl)-, methyl carbamate 3-1sopropylphenyl N-meethylcarbamate orm-Cumenyl methylcarbamate
P203	Propanal, 2-methyl-2-(methysulfonyl)-, 0- [(methylamino)carbonyl] oxime
P204	Pyrrolo[2,3-b]indol-5-ol, 1,2,3,3a,8,8a-hexahydro-1,3a,8-trimethyl-, methylcarbamate (ester), 3aS-cis)-
P205	Zinc, bis(dimethylcarbamodithioato-S,S=)-,

Commercial Chemical Products, Manufacturing Chemical Intermediates, or Off-Specification Commercial Chemical Products:

U001	Acetaldehyd
U002	Aceton
U003	Acetonitrile
U004	Acetophenone
U005	2-Acetylaminofluorene
U007	Acrulamide
U008	Acrylic acid
U009	Acrylonitrile
U010	Mitomycin C
U011	Amitrole
U012	Aniline
U014	Auramine
U015	Azaserine
U016	Benz(c)acridine
U017	Benzal chloride
U018	Benz(a)anthracene
U019	Benzene
U021	Benzidine
U022	Benzo(a)pyrene
U024	Bis(2-chloroethyoxy) methane
U025	Dichloroethyt ether
U026	Chloronaphaz'mc
U027	Bis(2-chloroisopropyl) ether
U028	Bis(2-ethylhexyl) phthalate
U029	Bethyl bromide
U030	Benzene, 1-bromo-4-phenoxy-
U031	N-Butyl alcohol
U032	Calcium chromate
U034	Chloral
U035	Chlommbucil
U036	Chlordane, technical
U037	Chlorobenzene
U038	Ethyl 4,4'-dichlorobenzilate
U039	4-Chloro-m-cresol
U041	1 -Chloro-2,3 –epoxypropane
U042	2-Chloroethyl vinyl ether
U043	Vinyl chloride
U044	Chloroform
U045	Methyl chloride
U046	Chloromethyl methyl ether
U047	beta-Chloronaphthalene
U048	o-Chlorophenol
U049	Benzenamine, 4,chloro-2-methyl-
U050	Chrysene

Waste No.	Description of Hazardous Waste
U051	Creosote
U052	Cresols
U053	Cretonaldehyde
U055	Cumene
U056	Cyclohexane
U057	Cyclohexanone
U058	Cyclophosphamide
U059	Datmomycin
U060	DDD
U061	DDT
U062	Diallate
U063	Dibenz[a,h] anthracene
U064	Dibenz[a,i]pyrene
U066	1,2-Dibromo-e-chloropropane
U067	Ethylene dibromide
U068	Methylene bromide
U069	Dibutyl phthalate
U070	o-Dichlorobenzene
U071	m-Dichlorobenzene
U072	p-Dichlorobenzene
U073	3-3'Dichlorobenzidine
U074	1,4-Dichloro-2-butene
U075	Dichlorodifluoromethane
U076	Ethylidene dichloride
U077	Ethylene dichloride
U078	1,1-Dichloroethylene
U079	1,2-Dichloroethylene
U080	Methylene chloride
U081	2,4-Dichlorophenol
U082	2,6-Dichlorophenol
U083	1,2-Dichloropropane
U084	1,3-Dichloropropane
U085	1,2:3,4-Diepoxybutane
U086	N,N-Diethylhydrazine
U087	o,o-Diethyl-S-methyl-dithiophosphate
U088	Diethyl phthalate
U089	Diethylstilbestrol
U090	Dihydrosafrole
U091	3,3'-Dimethoxybenzidine
U092	Dimethylamine
U093	Dimethylaminoazobenzene
U094	7,12-Dimethylbenz[a] anthracene
U095	3,3'-Dimethylbenzidine
U097	Dimethylcarbamoyl chloride
U098	1,1-Dimethylhydrazine
U099	1,2-Dimethylhydrazine
U101	2,4-Dimethylphenol
U102	Dimethyl phthalate
U103	Dimethyl sulfate

Waste No.	Description of Hazardous Waste
U105	2,4-Dinitrotoluene
U106	2,6-Dinitrotoluene
U107	Di-n-octyl phthalate
U108	1,4-Dioxane
U109	1,2-Diphenylhydrazine
U110	Dipropylam'me
U111	Di-N-propylnitrosamine
U112	Ethyl acetate
U113	Ethyl acrylate
U114	Ethytenebis(dithiocarbamic acid), salts and esters
Ul15	Ethylene oxide
U116	Ethylene thiourea
U117	Ethyl ether
U118	Ethyl methacrylate
U119	Ethyl methanseulfonate
U120	Fluoranthene
U121	Metane, trichlorofluoro-
U122	Formaldehyde
U123	Formic acid
U124	Furan
U125	Furfural
U126	Glycidylaldehyde
U127	Hexachlorobenzene
U128	Hexaehlorobutadene
U129	Lindane
U130	Hexachlorcyclopentadene
U131	Hexachloroethane
U132	Hexachlorophene
U134	Hydrogen fluoride
U135	Hydrogen sulfide
U136	Caeodylic acid
U137	Indeno[1,2,3-cd]pyrene
U138	Iodomethane
UI40	Isobutyl alcohol
U141	Isosaffole
U142	Kepone
U143	Lasiocarpine
U144	Lead acetate
U145	Lead phosphate
U146	Lead subacetate
U147	Maleic anhydride
U148	Maleic hydrazide
U149	Malononitrile
U150	Melphalan
U151	Mercury
U152	Methacrylonitrile
U153	Methanethiol
U154	Methanol

Waste No.	Description of Hazardous Waste
U155	Methapyrilene(T)
U156	Methyl chlorocarbonate
U157	3-Methylchlolanthrene
U158	4,4'-Methylenebis(2-chloroaniline)
U159	Methyl ethyl ketone
U161	Methyl isobutyl ketone
U162	Methyl methacrylate
U163	N-methyl-N'nitro-N-nitrosoquanidin
U164	Methylthiouracil
U165	Napthalene
U166	1,4-Naphthalenedione
U167	1-Naphthylamine
U165	2-Naphthylarnine
U169	Nitrobenzene
U170	p-Nitrophenol
U171	2-Nitropropane
U172	N-Nitrosodi-n-butylamine
U173	N –Nitrosodiethanotamine
U174	N-Nitrosodiethylamine
U176	N-Nitroso-N-ethylurea
U177	N-Nitroso-N-methylurea
U178	N-Nitroso-N-methylurethane
U179	N-Nitrosopiperidine
U180	Nitrosopyrrolidine
U181	5-Nitro-o-toluidine
U182	Paraldehyde
U183	Pentachlorobenzene
U184	Pentachloroethane
U185	Pentachloronitrobenzene
U186	1,3=Pentadiene
U187	Phenacefin
UI88	- Phenol
U190	Phthalic anhydride
U191	Pyfidine, 2-methyl-
U192	Pronamide
U193	1,3-Propane sultone
U194	1 –Propanamine
U196	Pyridine
U197	p-Benzoquino
U200	Reserpine
U201	Res0reinol
U202	Saccharin and salts
U203	Safrole
U204	Selenium dioxide
U206	Streptozotocin
U207	1,2,4,5,Tetrachlorobenzene
U208	1,1,1,2,-Tetrachloroethane
U209	1,1,2,2,-Tetrachloroethane

Waste No.	Description of Hazardous Waste
U210	Tetrachloroethylene
U211	Carbon tetrachloride
U213	Tetrahydrofuran
U214	Thallium(l) acetate
U215	Thallium(l) carbonate
U216	Thallium(i) chloride
U217	Thallium(l) nitrate
U218	Thioacetamide
U219	Thiourea
U220	Toluene
U221	Toluenediamine
U222	o-Toluidine hydrochloride
U225	Bromoform
U226	1,1,1-Trichtoroethane
U227	1,1,2-Trichloroethane
U228	Trichloroethene
U235	Tris(2,3-dibromopropyl) phosphate
U236	Trypan blue
U237	Uracil mustard
U238	Ethyl carbarmate (urethan)
U239	Xylene
U240	2,3-D, salts and esters
U243	Hexachloropropene
U244	Thiram
U246	Bromine cyanide
U247	Methoxychlor
U248	Warfarin, when present at concentrations of 0.3% or less
U249	Zinc phosphide, when present at concentrations of 10% or less
U271	Carbamic acid, [1-[(butylamino)carbonyl]-lH-benzimidazol-2-yl]-, methyl ester
U277	Carbamodithioic acid, diethyl-, 2-chloro-2-propenyl ester
U278	1,3-Benzodioxol-4-ol, 2,2-dimethyl-, methyl carbamate
U279	1-Naphthalenol, methylcarbamate
U280	Carbamic acid, (3-chlorophenyl)-, 4-chloro-2-butynyl ester
U328	o-Toluid'me
U353	p-Toluidine
U359	Ethylene glycol monoethyl ether
U364	1,3-Benzodioxol-4-ol, 2,2-dimethyl-,
U365	1H-Azepine-l-carbothiotic acid, hexahydro-, S-ethyl ester
U366	2H- 1,3,5 -Thiadiazine-2-thione, tetrahydro-3,5-dimethyl-
U367	7-Benzofuranol, 2,3 -dihydro-2,2-dimethyl,
U372	Carbamic acid, I H-benzimidazol-2-yl, methyl ester
U373	Carbamic acid, phenyi-, 1 -methylethyl ester
U375	Caerbamic acid, butyl-, 3-iodo-2-prophynl ester
U376	Carbamodithioic acid, dimethyl-, tetraanhydrosulfide with orthothioselenious acid

Waste No.	Description of Hazardous Waste
U377	Carbamodithioic acid, methyl,-monopotassium salt
U378	Carbamodithioic acid, (hydroxymethyt)methyl-,
U379	Carbamodithioic acid, dibutyl sodim salt
U381	Carbamodithioic acid, diethyl-, sodium salt
U382	Carbamodithioic acid, dimethyl-, sodium salt
U383	Carbamodithioic acid, dimethyl, potassium salt
U384	Carbamodithioic acid, methyl-, monosodium ester
U385	Carbamothioic acid, dipropyl-, S-propyl ester
U386	Carbamothioic acid, cyclohexylethyl-, S-ethyl ester
U387	Carbamothioic acid, dipropyl-, S-(phenylmethyl) ester
U389	Carbamothioic acid, bis(1-methylethyl)-S-(2,3,3-trichloro-2-propenyl) ester
U390	Carbamothioic acid, dipropyl-, S-ethyl ester
U391	Carbamothioic acid, butytethyl-, S-ethyl ester
U392	Carbamothioic acid, bis(2-methylpropyl)-, S-ethyl ester
U393	Copper, bis(dimethylcarbamodithioato-S,S=)-, Copper dimethyldithiocarbamate
U394	Ethanimidothioic acid, 2-(dimethylamino)-N-hydroxy-2-oxo-,methyl ester
U395	Ethanol, 2,2'-oxybis-, discarbamare
U396	Iron; tris(cl'unethylcarbarnodithioato- S,S=)-,
U400	Piperidine, l, 1 '-(tetrathiodiearbonothioyl)-bis-
U401	Bis(dhnethyl thiocarbamoyl) sulfide
U402	Thi0peroxydicarbonie diamide, tetrabutyl
U403	Thioperoxydicarbonic diamide, tetraethyl
U404	Ethanaminc, N,N-dicthyl-
U407	Zinc,bis(diethylcarbamodithioato-S,S=)-
U408	2,4,6-Tribromophenot
U409	Carbamic acid, [1,2-phenylenebis(iminocarbonothioyl)]bis, dimethyl ester
U410	Ethanimidothioc acid, N,N=-[thiobis(methylimimo)carbonyloxy]bis-,dimethyl ester
U411	Phenol, 2-(1-methylethoxy)-, methylcarbamate

ATTACHMENT 2 - INCIDENT REPORT FORM

Report all environmental incidents to **911** and/or **800-468-1760** immediately (including spills, fires, releases, etc.).

1. Facility Number:_____ Facility Location:_____
2. Incident Date:____ Approx. Time Began:_____ Discovered:_____ Ended:_____
3. Reported By:_____
4. Incident Location: Specify area of facility:_____

IF SPILL OR RELEASE, COMPLETE THIS SECTION:

5. Describe incident in detail (include materials, persons, and property involved):_____
6. Release to: Secondary Containment _____ Air ___ Land _____ Water/Sewer _____
7. Amount of Release: _____ (lbs./Gal.)
8. Materials Involved: (common name, chemical name)_____
   (a) Profile #: _____ (b) EPA Waste Codes: _____
9. Reportable Quantity Release: Yes _____ No _____
10. Cause of incident: _____
11. Injuries or property damage: _____
12. Describe response action and material not recovered:_____
13. Cleanup residue volume:_____ Spill Kit Restocked? Yes __No
14. Emergency agencies at scene (names and phone #s):_____
15. Potential public exposure? yes___ no___ comments:_____
16. Shipping papers associated with material released (check): ___Bill of Lading ___Manifest Not Applicable

17. Notification:	Infotrac 1-800-468-1760	NRC 1-800-424-8802			
Required?	X yes	__yes __no	__yes __no	__yes __no	yes __no
Date/Time:					
Contact name:					
Report #:					
Comments rec'd:					

Name of preparer (print):_____ Date:_____

TABLE 1
EMERGENCY INFORMATION
SAFETY-KLEEN SYSTEMS, INC. – DENTON RECYCLE CENTER
1722 COOPER CREEK ROAD
DENTON, TEXAS 76208

A. Emergency Coordinators

Primary: Jon Wingert
Facility General Manager
193 las Colinas Trail
Crossroads, TX 76227
(940) 483-5255
(469) 416-7850

Alternate: Sherry Watson
Operations Supervisor
100 Brookshear Dr.
Whitesboro, TX. 76273
(940) 483-5219
(940) 435-3726

Brandon Wallace
Facility Foreman
1363 County Line Church Rd.
Whitesboro, Texas 76273
(940) 735-3709
(940) 268-9774

B. Emergency Notification Phone Numbers

1. Safety Kleen Environmental Department
   Telephone: (800) 468-1760 (24 - hours)

2. National Response Center
   Telephone: (800) 424-8802

3. Texas Commission on Environmental Quality
   Telephone: (512) 239-7727 (24 – hours)
   (800) 823-8224 (24 – hours)

4. E.P.A. Region VI
   Telephone: (214) 665-2222 (24 – hours)

5. City of Denton
   Telephone: (940) 339-8610

C. Emergency Teams to be Notified

1. Denton Police Department
   601 E. Hickory, Suite E
   Denton, Texas 76205
   Emergency 911
   Non-Emergency (940) 349-8181

C. Emergency Teams to be Notified (cont.)

2. Denton Fire Department
   332 E. Hickory
   Denton, Texas 76201
   Emergency 911
   Non-Emergency (940) 349-8840

3. Denton Regional Medical Center
   3535 South Interstate Highway 35E
   Denton, Texas 76205
   Telephone: (940) 384-3535

4. North Texas Field Services
   1722 Cooper Creek Road
   Denton, Texas 76208
   Telephone: (940) 735-3712
   (800) 645-8265 (24 hours)

D. Additional Information

1. Facility Name: Denton Recycle Center
   1722 Cooper Creek Rd.
   Denton, Texas 76208

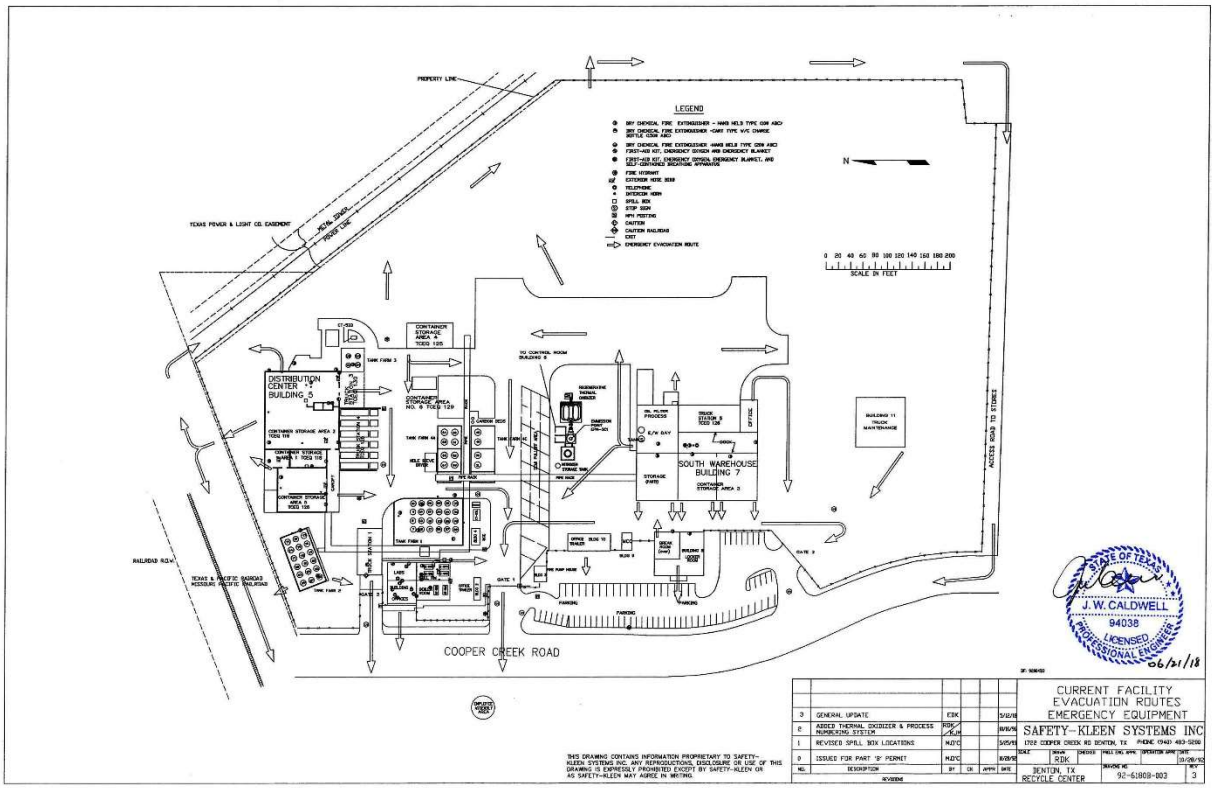
2. Facility Manager: Jon Wingert
   193 las Colinas Trail
   Crossroads, TX 76227
   (469) 416-7850

3. Facility Owner: Safety-Kleen Systems, Inc.
   42 Longwater Drive
   Norwell, MA 02061
   Telephone: (781) 792-5000

4. Texas Commission on Environmental Quality
   P.O. Box 13087
   Austin, Texas 78711-3087
   Telephone: (512) 239-7727
   (800) 823-8224

TABLE 2
EMERGENCY EQUIPMENT LIST

ITEM	CAPACITY	EQUIPMENT LOCATIONS/DESCRIPT.
Fire Extinguishers	1-10 lb hand held 23-20 lb hand held	ABC type universal system effective on paper, wood, and electrical fires, as well as solvents.
	4-150 lb ABC type	Cart type with carbon dioxide charge cylinder
Absorbent		Sheets and granular material located at different locations at the facility.
Telephone System		Located in the main office, the production and maintenance offices, shipping and receiving docks, and the laboratory
Shovels, Rakes, Squeezes, Brooms		Located through out the facility and used to spread and remove absorbents.
Fire Suppression System		The facility is covered by a foam fire suppression system.
Safety Equipment: Goggles Respirators, Plastic Aprons, Boots.		Located in the spill control and safety Gloves equipment boxes (See attached Current Emergency Equip/Evac and Proposed Emergency Equip/Evac facility drawings)
Eyewash Stand with Safety Shower Units		Located through out the facility as shown on Exhibits 7 & 8.
First Aid Kits		Located in Main Office, Production Area in South Warehouse, Immersion Cleaner Production Area & Maintenance Shop.
Self Contained	6-30 minutes	Located in the fire pump house, North & South Warehouse Offices.


LEGEND
PROPERTY LINE
TEXAS PIPER & LIGHT CO. EASEMENT
DISTRIBUTION CENTER 1 & BUILDING 5
SOUTH WAREHOUSE BUILDING 7
COOPER CREEK ROAD
RAILROAD R.O.W.
TEXAS & PACIFIC MISSOURI PACIFIC RAILROAD
ACCESS ROAD TO STORES
SCALE IN FEET
J. W. CALDWELL
94038
LICENSED PROFESSIONAL ENGINEER
06/21/18
CURRENT FACILITY EVACUATION ROUTES EMERGENCY EQUIPMENT
SAFETY-KLEEN SYSTEMS INC
1700 COOPER CREEK RD BENTON, TX
BENTON, TX RECYCLE CENTER
92-61808-003
3
GENERAL UPDATE
ADDED THERMAL OXIDIZER & PROCESS NUMBERING SYSTEM
REVISED SPILL BOX LOCATIONS
ISSUED FOR PART 'B' PERMIT

ESA

Biological Evaluation:
Safety-Kleen Commercial PCB Storage Permit Renewal
1722 Cooper Creek Rd – Denton, TX

PREPARED BY:
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 6
LAND, CHEMICAL, AND REVITALIZATION BRANCH
1201 ELM STREET
DALLAS, TX 75270

May 28, 2024

Table of Contents

1.0 Background Information

Safety-Kleen Services, Inc. (TXR000081205) currently operates a commercial storage facility which includes the storage of liquid and solid polychlorinated biphenyls (PCBs) and PCB items in Bay Area B, Container Storage Area 3, with PCB concentrations limited to 50 parts per million (ppm) to 500 ppm of PCBs at its facility located at 1722 Cooper Creek Rd, Denton, Denton County, Texas (Figure 1). The requirements of 40 CFR 761.75 will be met in the PCB storage area, and no new construction is anticipated.

2.0 Scope of Federal Action

2.1 Environmental Protection Agency (EPA) Action on PCB Storage Permit Reauthorization Request

The federal action that is the subject of this Biological Evaluation (BE) is EPA's proposed approval of Safety-Kleen's permit reauthorization request. The design and operation at the facility in Denton would remain unchanged, requiring no construction. Permit approval would allow for the continued storage of PCB-containing waste in accordance with 40 CFR 761.75 in the designated PCB disposal areas as well as treatment and incineration.

The following analysis of the effects of the action assumes that the operating procedures implemented at the site will prevent the release of PCB-containing waste.

2.2 Site and Surrounding Land Use

The existing Safety-Kleen storage facility (Facility Layout Appendix A) operates under Texas Commission on Environmental Quality (TCEQ) industrial and hazardous waste permit No. 50163 and has an EPA TSCA PCB commercial storage permit. Adjacent land uses include Highway 380 and businesses to the south, commercial development to the west and north, and some undeveloped grassland with some trees and bushes to the east.

3.0 Effects Assessment

3.1 Species of Potential Concern

The EPA requested and received the current Endangered Species Act (ESA) species list through the US Fish and Wildlife Service's (USFWS) ECOS-IPaC system for the defined action area. Table 1 lists the threatened, endangered, and candidate species from the 2024 list as well as their current status and critical habitat.

Figure 1. Site Location (Google 2024)

Table 1. Species listed under the ESA within the action area (IPaC 2024)

Species	Status	Critical Habitat
Tricolored Bat (*Perimyotis subflavus*)	Proposed Endangered	No critical habitat has been designated
Piping Plover (*Charadrius melodus*)	Threatened	Location does not overlap the critical habitat
Rufa Red Knot (*Calidris canutus rufa*)	Threatened	There is proposed critical habitat; species only needs to be considered for wind energy projects
Whooping Crane *(Grus americana)*	Endangered	Location does not overlap the critical habitat
Alligator Snapping Turtle (*Macrochelys temminckii*)	Proposed Threatened	No critical habitat has been designated
Monarch Butterfly *(Danaus plexippus)*	Candidate	No critical habitat has been designated

3.2 Species Assessments and Determinations

The EPA has made the following assessments and determinations considering information produced by USFWS and other researchers in evaluating whether EPA's proposed permitting action is Likely to Adversely Affect, Not Likely to Adversely Affect, or would have No Effect on the listed species.

The tri-colored bat hibernates six to nine months a year, primarily in caves or mines (Texas 2023). This bat has been found to migrate only an average of 31 miles to its summary nursery site, tending to consist of 35 or fewer females in buildings, tree cavities, or rock crevices, from which

they emerge after sunset and again around midnight to catch small insects along a forest edge or over a pond or other waterway (Texas 2023). There do not appear to be any mines or caves in the site vicinity to provide suitable wintering habitat (MinesDatabase 2024). Denton County lies within "the Blackland Prairie, Grand Prairie, and East Cross Timbers Resource Areas in north-central Texas" (USDA SCS 1978). The Safety-Kleen facility sits in a largely developed area approximately 1,000 feet east/northeast of the intersection of highways 288 and 380. With no apparent wintering habitat in the vicinity and limited wooded areas to provide a forest edge for foraging, it is unlikely that the tri-colored bat would be found near the facility. Therefore, re-permitting of the Safety-Kleen facility will have no effect on the tri-colored bat.

The 2024 USFWS's ECOS-IPaC species list indicated that the Rufa Red Knot, a shore bird, need only be considered for Wind Energy Projects. Neither the Piping Plover nor Whooping Crane has critical habitat in the area of the subject facility (USFWS 2024). Therefore, re-permitting of the Safety-Kleen facility will have no effect on these bird species.

The alligator snapping turtle is a reptile that is primarily found in riverine systems which flow into the Gulf of Mexico. Because the subject facility is not close to a suitable water body, re-permitting of the storage facility will have no effect on the alligator snapping turtle.

Monarch butterflies require milkweed plants for laying their eggs, specifically for the development of the larval stage which requires the cardenolides supplied by these plants for the larvae to develop their toxicity, a protective mechanism against predators (USFWS 2022). The adult butterfly depends on flowering plants to gather nectar for sustenance during migration. The renewal of the Safety-Kleen facility's permit will not result in any construction at the facility, so no reduction in habitat would occur. The WHO (2000) indicates that there has been no evidence that plants concentrate PCBs, but rather they reflect the concentration in ambient air. There is little likelihood of PCB-containing particulate matter being generated in the sampling for waste characterization executed at the facility; therefore, permit renewal would have no effect on monarch butterflies.

4.0 Effects Determination

The EPA has determined that approval of the PCB Commercial Storage Renewal Permit for Safety-Kleen is expected to have no effect on any of the species in the USFWS iPaC list.

5.0 References

The Cornell Lab. 2023. Piping Plover Life History. Retrieved from: https://www.allaboutbirds.org/guide/Piping_Plover/lifehistory

MinesDatabase.com. 2024. Itasca Quarry. https://minesdatabase.com/mines/view/4104761

ODWC. 2023. Alligator Snapping Turtle. https://www.wildlifedepartment.com/wildlife/field-guide/reptiles/alligator-snapping-turtle

Texas Parks and Wildlife (TPWD). 2023. Tricolored Bat *(Perimyotis subflavus)*. Retrieved from: https://tpwd.texas.gov/huntwild/wild/species/easpip/

USDA. 2022a. Habitat Needs. Retrieved from USDA US Forest Service website: https://www.fs.usda.gov/wildflowers/pollinators/Monarch_Butterfly/habitat/index.shtml

USDA. 2022b. Monarch Butterfly Biology. Retrieved from USDA US Forest Service website: https://www.fs.usda.gov/wildflowers/pollinators/Monarch_Butterfly/biology/index.shtml

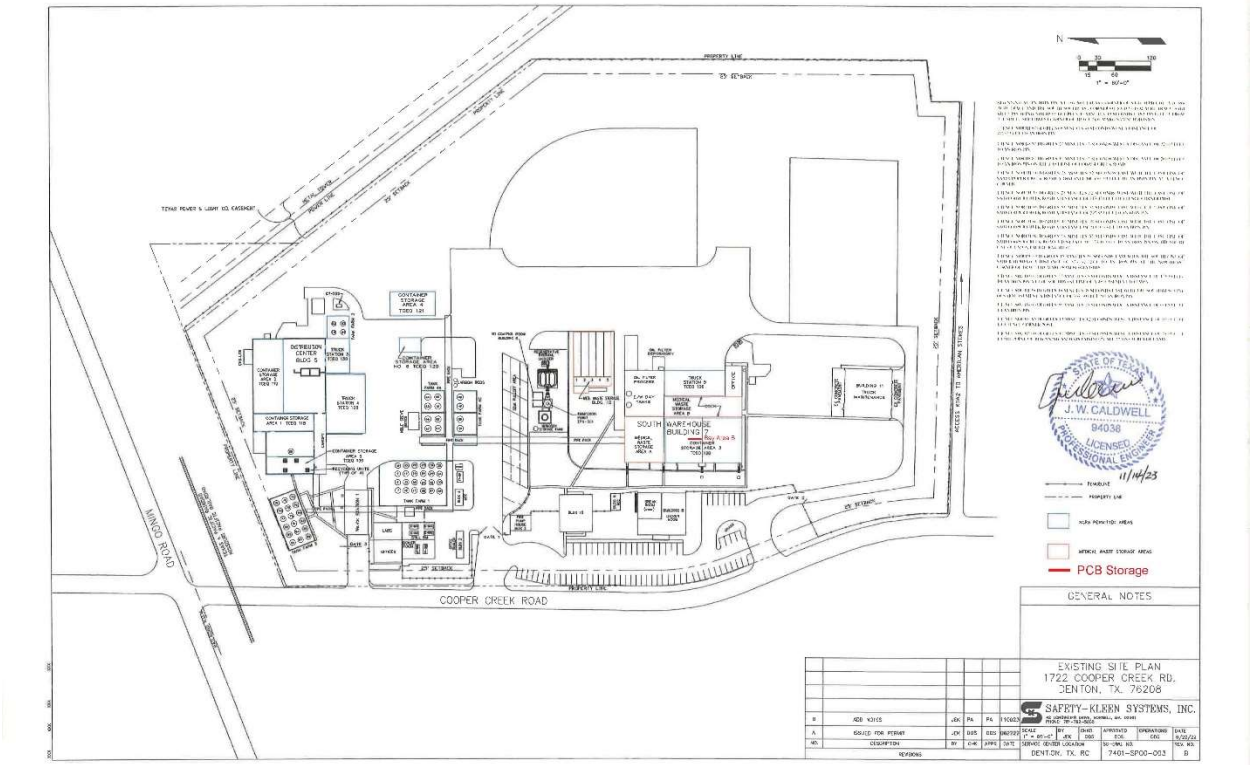
USFWS. 2022. Monarch butterfly *(Danaus plexippus)*. Retrieved from USFWS ECOS Environmental Conservation Online System; Conserving the Nature of America website: https://ecos.fws.gov/ecp/species/9743

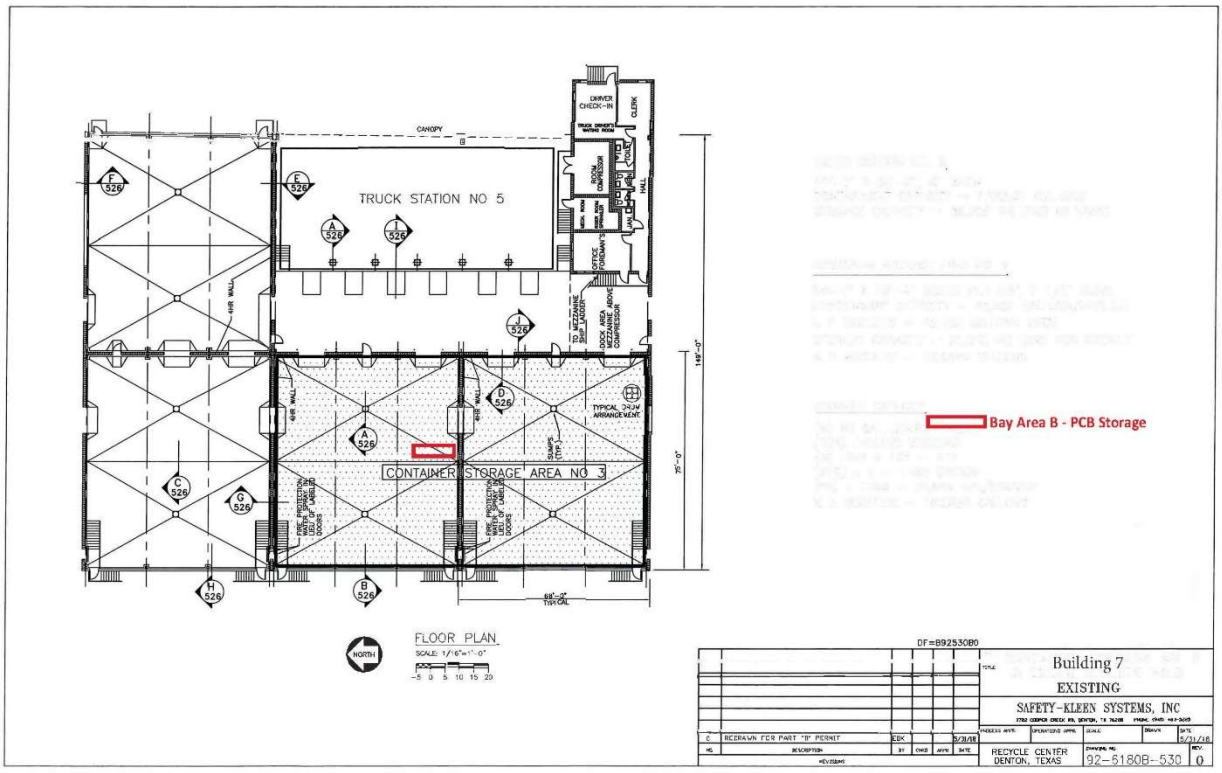
USFWS. 2023. Red Knot. Retrieved from: https://www.fws.gov/species/red-knot-calidris-canutus

USFWS. 2024. Safety-Kleen Denton PCB Permit Renewal Species List.

World Health Organization. Regional Office for Europe. (2000). Air quality guidelines for Europe, 2nd ed. World Health Organization. Regional Office for Europe. Retrieved from: https://apps.who.int/iris/handle/10665/107335

Appendix A


COOPER CREEK ROAD
MINOCO ROAD
SOUTH WAREHOUSE BUILDING 2
PCB Storage
GENERAL NOTES
EXISTING SITE PLAN
1722 COOPER CREEK RD.
DENTON, TX. 76208
SAFETY-KLEEN SYSTEMS, INC.
DENTON, TX. RC
7401-SP00-003
J.W. CALDWELL
94038
LICENSED
PROFESSIONAL ENGINEER
11/14/23


TRUCK STATION NO 5
CONTAINER STORAGE AREA NO 3
CANOPY
DRIVER CHECK-IN
CLERK
OFFICE FOREMAN
TYPICAL 24-UM ARRANGEMENT
Bay Area B - PCB Storage
FLOOR PLAN
NORTH
DF=8925308D
Building 7
EXISTING
SAFETY-KLEEN SYSTEMS, INC
RECYCLE CENTER
DENTON, TEXAS
92-5180B-530
REDRAWN FOR PART "B" PERMIT
5/31/18

Appendix B

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Arlington Ecological Services Field Office
501 West Felix Street
Suite 1105
Fort Worth, TX 76115-3410
Phone: (817) 277-1100 Fax: (817) 277-1129
Email Address: arles@fws.gov

In Reply Refer To: 04/04/2024 18:31:53 UTC
Project Code: 2024-0072975
Project Name: Safety Kleen Denton PCB Permit Renewal

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, which may occur within the boundary of your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under section 7(a)(1) of the Act, Federal agencies are directed to utilize their authorities to carry out programs for the conservation of threatened and endangered species. Under and 7(a)(2) and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to determine whether their actions may affect threatened and endangered species and/or designated critical habitat. A Federal action is an activity or program authorized, funded, or carried out, in whole or in part, by a Federal agency (50 CFR 402.02).

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For Federal actions other than major construction activities, the Service suggests that a biological evaluation (similar to a Biological Assessment) be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

After evaluating the potential effects of a proposed action on federally listed species, one of the following determinations should be made by the Federal agency:

1. *No effect* - the appropriate determination when a project, as proposed, is anticipated to have no effects to listed species or critical habitat. A "no effect" determination does not require section 7 consultation and no coordination or contact with the Service is necessary. However, the action agency should maintain a complete record of their evaluation, including the steps leading to the determination of affect, the qualified personnel conducting the evaluation, habitat conditions, site photographs, and any other related information.
2. *May affect, but is not likely to adversely affect* - the appropriate determination when a proposed action's anticipated effects to listed species or critical habitat are insignificant, discountable, or completely beneficial. Insignificant effects relate to the size of the impact and should never reach the scale where "take" of a listed species occurs. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not be able to meaningfully measure, detect, or evaluate insignificant effects, or expect discountable effects to occur. This determination requires written concurrence from the Service. A biological evaluation or other supporting information justifying this determination should be submitted with a request for written concurrence.
3. *May affect, is likely to adversely affect* - the appropriate determination if any adverse effect to listed species or critical habitat may occur as a consequence of the proposed action, and the effect is not discountable or insignificant. This determination requires formal section 7 consultation.

The Service has performed up-front analysis for certain project types and species in your project area. These analyses have been compiled into *determination keys*, which allows an action agency, or its designated non-federal representative, to initiate a streamlined process for determining a proposed project's potential effects on federally listed species. The determination keys can be accessed through IPaC.

The Service recommends that candidate species, proposed species, and proposed critical habitat be addressed should consultation be necessary. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found at: https://www.fws.gov/service/section-7-consultations

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (https://www.fws.gov/library/collections/bald-and-golden-eagle-management). Additionally, wind energy projects should follow the wind energy guidelines (https://www.fws.gov/media/land-based-wind-energy-guidelines) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation. The Federal Aviation Administration (FAA) released specifications for and made mandatory flashing L-810 lights on new towers 150-350 feet AGL, and the elimination of L-810 steady-burning side lights on towers above 350 feet AGL. While the FAA made these changes to reduce the number of migratory bird collisions (by as much as 70%), extinguishing steady-burning side lights also reduces maintenance costs to tower owners. For additional information concerning migratory birds and eagle conservation plans, please contact the Service's Migratory Bird Office at 505-248-7882.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arlington Ecological Services Field Office
501 West Felix Street
Suite 1105
Fort Worth, TX 76115-3410
(817) 277-1100

PROJECT SUMMARY

Project Code: 2024-0072975
Project Name: Safety Kleen Denton PCB Permit Renewal
Project Type: Commercial Development
Project Description: Hazardous Material Storage - no new construction required.
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@33.23702745,-97.08145111156517,14z

Counties: Denton County, Texas

ENDANGERED SPECIES ACT SPECIES

There is a total of 6 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 2 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Tricolored Bat *Perimyotis subflavus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

BIRDS

NAME	STATUS
Piping Plover *Charadrius melodus* Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is **final** critical habitat for this species. Your location does not overlap the critical habitat. This species only needs to be considered under the following conditions: ▪ Wind Energy Projects Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened
Rufa Red Knot *Calidris canutus rufa* There is **proposed** critical habitat for this species. This species only needs to be considered under the following conditions: ▪ Wind Energy Projects Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened
Whooping Crane *Grus americana* Population: Wherever found, except where listed as an experimental population There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/758	Endangered

REPTILES

NAME	STATUS
Alligator Snapping Turtle *Macrochelys temminckii* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4658	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act[1] and the Migratory Bird Treaty Act[2].

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats[3], should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to Bald Eagle Nesting and Sensitivity to Human Activity

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper

Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

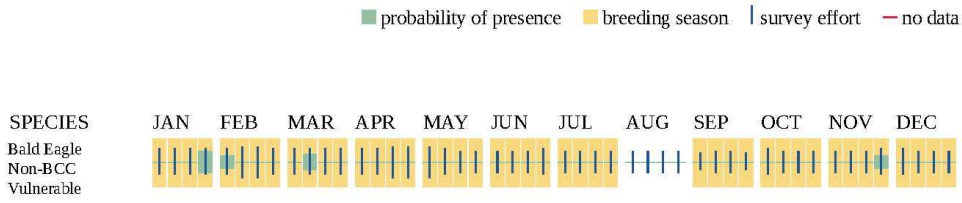
Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats[3] should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Golden-plover *Pluvialis dominica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10561	Breeds elsewhere
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Sep 1 to Jul 31
Chimney Swift *Chaetura pelagica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Little Blue Heron *Egretta caerulea* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9477	Breeds Mar 10 to Oct 15
Pectoral Sandpiper *Calidris melanotos* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere

NAME	BREEDING SEASON
Prothonotary Warbler *Protonotaria citrea* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9439	Breeds Apr 1 to Jul 31
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10
Sprague's Pipit *Anthus spragueii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8964	Breeds elsewhere

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

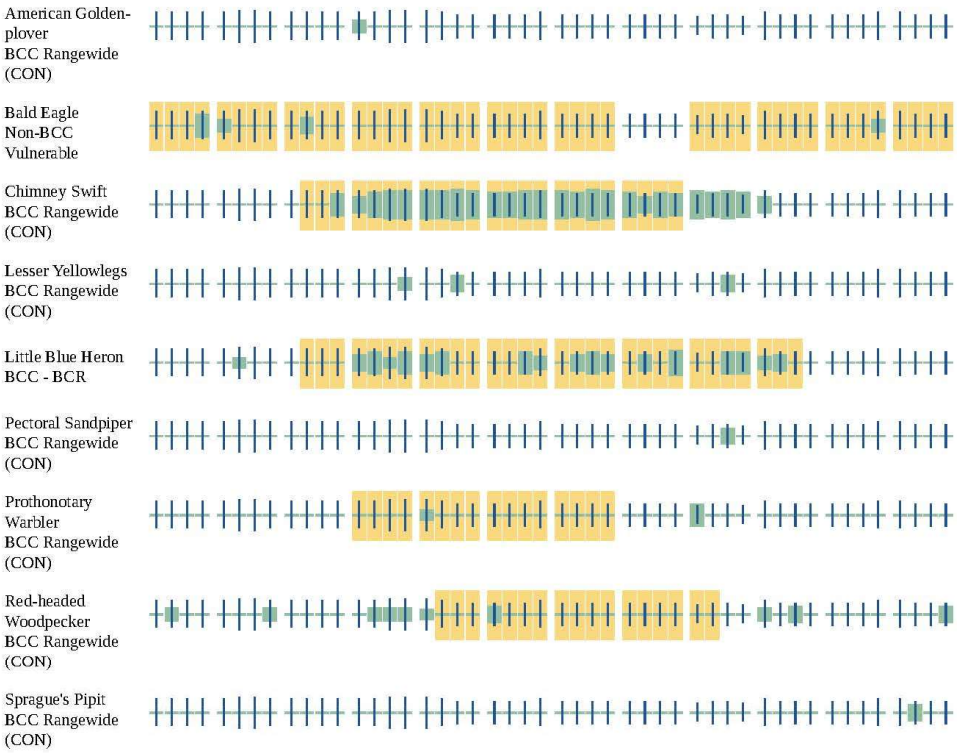
Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort – no data

SPECIES	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER POND

- PUBHx
- PUBHh

IPAC USER CONTACT INFORMATION

Agency:	Environmental Protection Agency
Name:	Lisa Schaub
Address:	1201 Elm Street
Address Line 2:	Suite 500
City:	DALLAS
State:	TX
Zip:	75270
Email	schaub.lisa@epa.gov
Phone:	2146658583

NHPA

REGION 6
DALLAS, TX 75270

June 18, 2024

MEMORANDUM

SUBJECT: Documentation of NHPA Section 106 Determination
Safety-Kleen Denton EPA TSCA PCB Permit Reauthorization
EPA RCRA ID No. TXR000081205

FROM: Lisa Schaub, Remedial Project Manger
RCRA Corrective Action (LCR-RC)

THROUGH: Laurie King, Supervisor
RCRA Corrective Action Section (LCR-RC)

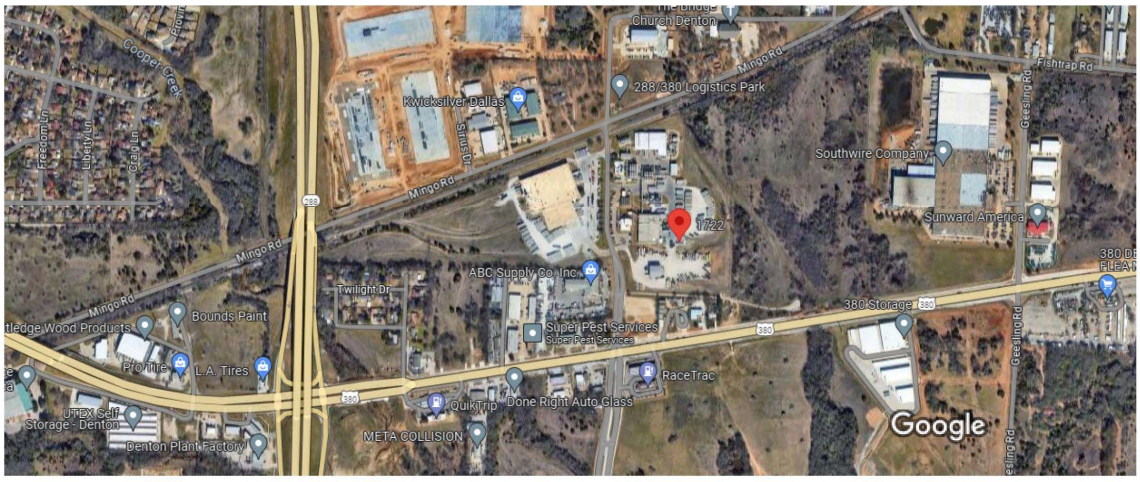
TO: File

Based on a review of the proposed reauthorization of the above facility located at 1722 Cooper Creek Road in Denton, Texas to store liquid and solid polychlorinated biphenyls (PCBs) and PCB Items in Bay Area B, Container Storage Area 3, as well as the map of known historical resources in the area via the Texas State Historic Preservation Office's AtlasMap, permit approval will have no effect on historic properties. The Area of Potential Effect consist of immediately adjacent properties due to the viewshed and traffic associated with the facility operation. The attached map indicates the nearest historic sites, the Cooper Creek Baptist Church (582 Fishtrap Road) and the adjacent Cooper Creek Cemetery and School, are about 1,000 feet north/northeast of the site, with Mingo Road and railroad tracks lying between the historic sites and the one-story facility. Therefore, no historic properties will be impacted.

ATTACHMENTS
1. Safety-Kleen Denton – Google Maps
2. Safety-Kleen Denton with Historic Resources

cc: Harry Shah, LCR-RP
Jay Przyborski, ORCD
Erik Christianson, LCR-RP

Google Maps 1722 Cooper Creek Rd



Imagery ©2024 Airbus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2024 Google 500 ft

1722 Cooper Creek Rd

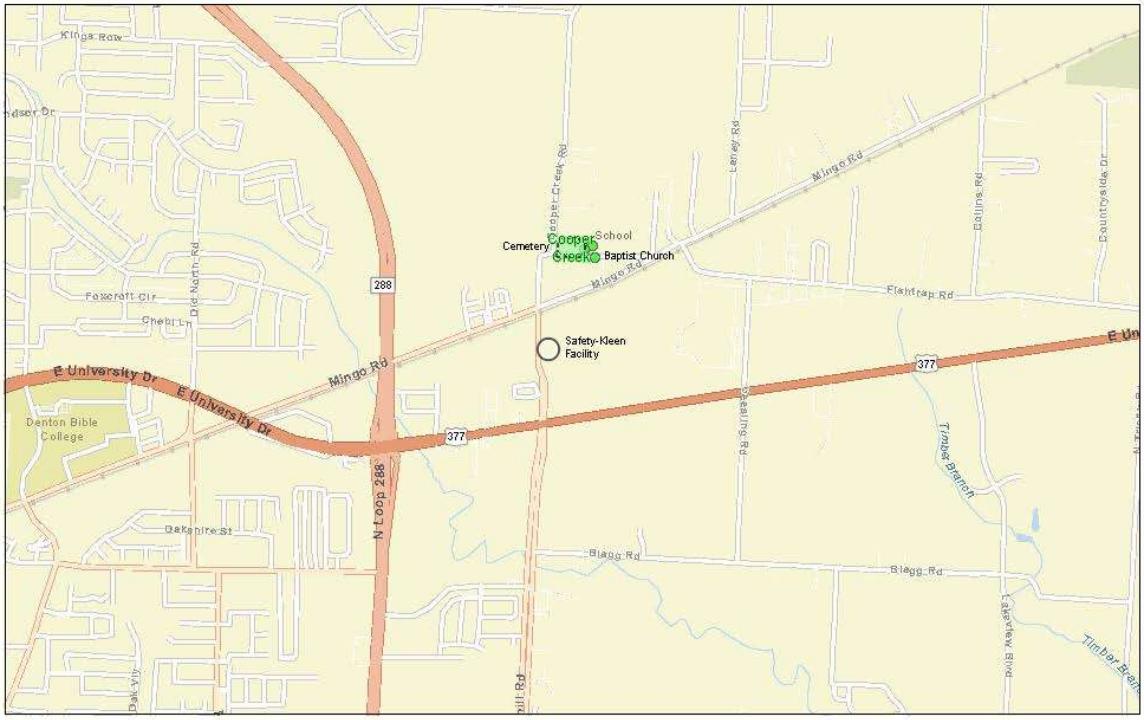
Building

Directions Save Nearby Send to phone Share

1722 Cooper Creek Rd, Denton, TX 76208

Photos

Safety-Kleen Denton



4/4/2024

1:23,435

0 0.15 0.3 0.6 mi

0 0.28 0.55 1.1 km

Cemeteries

Historical Marker

https://mappingtexashistory.thc.texas.gov/arcgis/rest/directories/arcgisoutput/Utilities/PrintingTools_GPServer/_ags_2637c522-f2ca-11ee-a6be-00155d02ae32.pdf

At this place

Safety-Kleen Systems
4.5 (24)