Safety-Kleen Systems, Inc.

6334 Supply Way
Boise, Idaho 83716-5532
IDD 981770498

Part B Renewal

Volume 1

February 14, 2013

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1.0 FACILITY DESCRIPTION
ABSTRACT

CORPORATE HEADQUARTERS:	Safety-Kleen Systems, Inc. 2600 North Central Expressway, Suite 400 Richardson, Texas 75080 (972) 265-2000
FACILITY ADDRESS:	Safety-Kleen Systems, Inc. 6334 Supply Way Boise, Idaho 83716-5532
TELEPHONE NUMBER:	208/342-8882
USEPA I.D. Number:	IDD 981770498
GEOGRAPHIC LOCATION:	43° 32' 38" N 116° 10' 54" W
OWNER:	Safety-Kleen Systems, Inc. 2600 North Central Expressway, Suite 400 Richardson, Texas 75080
DATE OF PURCHASE:	January 1991

DESCRIPTION OF ACTIVITIES:

The site includes: (1) an enclosed container storage area located within the office building; (2) one enclosed shelter that is separate from the office building used for container storage and (3) a tank farm, which has one 12,000 gallon above ground storage tank for hazardous waste, and two other 12,000 gallon above ground tanks used for storage of products. A loading dock with a solvent return and fill station, which is used to transfer waste/product to/from the storage tanks. The return and fill station consists of a 162-gallon tank used to wash drums and ancillary equipment. The return and fill dock is located near the tank farm. This facility is an accumulation point for spent solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators. All

wastes are ultimately shipped to a Safety-Kleen recycling facility or to a contract reclaimer or other permitted treatment or disposal facility.

PROPERTY DESCRIPTION:

2.34 acres with the following structures:

a. One building with offices and a warehouse for container storage;
b. One tank farm containing three 12,000 gallon aboveground storage tanks (One tank contains spent solvent, one tank contains product solvent, and one tank is empty)
c. One loading dock with a solvent return and fill station
d. One enclosed shelter to be used for container storage.
e. One area to hold transfer waste (not RCRA permitted) and non-regulated material, such as clean product, used oil filters, oil debris and RCRA empty containers.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT (GAL.)	MATERIAL TO BE STORED
Tank	12,000	14,620	Spent Parts Washer Solvent (D039)[2]
Container Storage-- Warehouse	4,464	529	Dumpster Sediment (typically D001)[1]
			Branch Debris (typically D001)[1]
			Spent Immersion Cleaner (varies)[1]
			Dry Cleaning Waste (F002, D001)[2]
			Spent Aqueous Cleaning solvent (Typically non-hazardous)[1]
			Paint Waste (F003, F005, D001)[1]
			Oil Retain Samples (D001)[1]

			Used Aerosol Containers (Typically D001)[1]
Container Storage--Metal Paint Shelter	2,592	1,210	Paint Waste (F003, F005, D001)[1]
			Spent Parts Washer Solvent (D039)[1]
Return and Fill Drum Washing Tank	162	1,038	Spent Parts Washer Solvent (D039)[1]

Note 1: The following waste codes may also apply D001, F002, F003, F004, F005, D004, D005, DOO6, DOO7, DOO8, DOO9, DO10, DO11, DO18, DO19, D021, DO22, DO23, DO24, DO25, DO26, DO27, DO28, DO29, DO30, DO32, DO33, DO34, DO35, D036 DO37, DO38, DO39, DO40, DO41, DO42, and/or DO43. The above permitted waste streams codes are based on the Safety-Kleen Annual Recharacterization process shown in appendix D-1. These may change from year to year as waste characteristics change.

Note 2: The following waste codes may also apply D001, D004, D005, D006, D007, D008, D009, D010, DO11, DO18, DO19, D021, DO22, DO23, DO24, DO25, DO26, DO27, DO28, DO29, DO30, DO32, DO33, DO34, DO35, D036 DO37, DO38, DO39, DO40, DO41, DO42, and/or DO43. The above permitted waste streams codes are based on the Safety-Kleen Annual Recharacterization process shown in appendix D-1. These may change from year to year as waste characteristics change.

1.0 FACILITY DESCRIPTION

1.1 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Systems, Inc. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. The company has been operating since 1968 offering solvent collection and reclamation services for its customers, more than 99% of whom generate less than 1000 kilograms (2200 pounds) per month.

Currently, Safety-Kleen offers services, which involve the accumulation and storage of several spent materials, which have been collected from its customers. These wastes are shipped from the service center to one of Safety-Kleen's recycle centers, an independent reclaimer, or other permitted treatment or disposal facility. The majority of spent materials are reclaimed/recycled and are potentially returned to the customer as useable product.

The Boise facility operates as a branch service center. The service center operations include distribution of parts washer solvents to customers and collection of spent materials. The waste solvents are returned to the facility and temporarily stored in either the above ground storage tank or within the container storage areas. Wastes are stored at the facility until they are shipped to a Safety-Kleen recycle center, contract reclaimer, or other permitted treatment/disposal facility. A Part A Application for storage of hazardous wastes is presented in Appendix A.

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit containing Safety-Kleen Solvent. On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the container of used solvent with one of clean product. Each sales representative performs about fifteen of these services per day, collecting the USDOT-approved containers of used solvent on a truck.

If able, at the end of each day, the waste solvent is transferred from the containers to a storage tank at the service center and containers of product are prepared for the next day's services. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load

of clean solvent and collects the spent solvent at the service center. Generally, two-thirds of the solvent used by Safety-Kleen customers has been reclaimed, the remainder being purchased from a vendor. A diagram of process flow diagrams for typical Safety-Kleen wastes is contained in Appendix B.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model. In these cases, Safety-Kleen provides the parts washer solvent in order to allow the solvent to be serviced by our representatives for recycling via our standard program.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a USDOT approved container containing a non-halogenated hydrocarbon mixture. The spent immersion cleaner solvent remains in the container after delivery to the service center where it is stored in a container storage area of the warehouse. Periodically, fresh solvent is delivered, and the drums of spent solvent are collected for reclamation.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents. These wastes are containerized on the customer's premises in containers meeting USDOT specifications and are periodically collected by a sales representative. The containerized waste is transported to the facility and placed in a container storage area of the warehouse prior to shipment to a Safety-Kleen recycle center, contract reclaimer, or other facility permitted to accept this waste.

1.1.3 Paint Waste Collection Service

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. . Paint gun cleaning machines are leased to customers with a reservoir of lacquer thinner (for cleaning of paint guns). On a periodic basis the reservoir is replaced and the spent solvent is taken back to the facility for shipment to a reclamation facility. Other paint wastes, which

may consist of various thinners and paints, are collected in containers meeting USDOT specifications on the customer's premises. These containers are collected and stored in an enclosed metal shelter which is separate from the office/warehouse, or may be stored in the permitted warehouse if space and volume allows. These wastes are periodically shipped to a reclaimer. The regenerated solvent is distributed to Safety-Kleen customers for use as product. The wastes that are not regenerated as solvent may be potentially used as fuels or shipped to another appropriately permitted treatment, storage, or disposal facility.

1.1.4 Spent Aqueous Cleaning Solution

Spent Aqueous Cleaning Solution is a by-product of brake cleaning and/or parts washing processes involving aqueous based solution. Safety-Kleen has determined Spent Aqueous Cleaning Solution to be consistently non-hazardous. However, when chlorinated solvents are shown to be used prior to washing the parts in their aqueous parts washer Safety-Kleen feels it is prudent to manage these aqueous cleaner solutions as hazardous, unless generator and/or Safety-Kleen analytical data proves the waste may be managed otherwise.

Appendix D-4 provides results from in the analytical study performed by Safety-Kleen Systems, Inc. (SK) to demonstrate that spent *Aqueous Parts Washer Cleaning Solution (APW)* can be characterized and managed as RCRA non-hazardous when:

- Used in accordance with manufacturer's instructions, and
- Used under conditions in which RCRA regulated constituents won't be introduced at concentrations that exceed a regulatory threshold.

In accordance with U.S. EPA's SW-846 Chapter 9 (September 1986) guidance document on waste characterization, the following steps were taken:

- Representative samples of APW were pulled from 112 random SK customers
- Samples were submitted to an accredited 3rd party laboratory for TCLP analysis utilizing EPA SW-846 methodologies

- A nonparametric 90% upper confidence limit (UCL) for the 50th percentile of the analytical data distribution was calculated and values compared against the RCRA TC regulatory limits.

The Table in Appendix D-4 summarizes the statistical evaluation and resulting RCRA non-hazardous disposition for spent APW.

1.1.5 Used Oil and Vacuum Services

The company offers a used oil and vacuum services program. Used oil is picked up from Safety-Kleen customers and may be managed at one of Safety-Kleen's oil re-refineries or at a third party recycler or treatment facility. The vacuum waste stream is a non-hazardous waste stream collected from Safety-Kleen customers using the vacuum truck. Neither waste streams are not stored in containers or in the facility's permitted storage unit. These streams are added to the permit in order to be able to prepare a shipping document when the truck load is shipped to either a second transporter or the final destination.

As a result of the above Used Oil and Vacuum Services program, used oil and vacuum retain samples are generated. This waste stream is generated as a result of disposing of the oil and vacuum retain samples after they have been stored at the branch for at least 90 days. Once these retain samples are discarded, they are considered hazardous waste.

1.2 DESCRIPTION OF THE FACILITY

The Service Center has been operating as a storage facility since 1993. The facility consists of the following structures:

a. A 5,000 square foot warehouse with offices and a contained area for container storage;

b. Three 12,000 gallon tanks (only one is for hazardous waste storage) in a concrete secondary containment dike, for clean and spent solvent;

c. A secondarily contained solvent return and fill station with a wet dumpster/drum washer (162-gallon tank), and loading dock,

d. An enclosed 300 square foot metal shelter for the storage of containerized paint waste or excess spent mineral spirits,

e. A tanker truck loading/unloading area with a lidded secondary containment dumpster around the fill pipes, and

f. A transfer waste area for holding transfer wastes for ten (10) days or less (not RCRA permitted) and for storage of non-regulated material (i.e. clean product).

The trucks arriving to fill the product solvent tanks and load the spent solvents for reclamation perform these activities adjacent to the aboveground tank area. The tanker truck loading/unloading area has secondary containment in the form of a sloped concrete pad and sump.

Descriptions of the surrounding area and of waste management practices at the service center follow. Applicable maps and facility drawings are in Appendix C.

1.2.1 Regional Description

The Boise service center is located in Ada County about one mile west of the Gowen Road exit from I-80, on Supply Way. The service center is located at 6334 Supply Way in the Boise Industrial Park. This area is zoned for light industrial activities and to the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which may be in conflict with the operations at this site.

Ada County covers nearly 600,000 acres or 940 square miles and has a population of over 400,000 in 2011. Boise is the capital of Idaho and its largest city. Several large industries are headquartered in Boise; however, most of the area is agricultural. Major crops in Ada County include wheat, barley, oats, corn, hay and potatoes. Cattle and sheep are also raised in Ada County. The climate is characterized by cold, though not severe, winters and warm summers. The

average temperature in winter is 33°F and in summer is 71°F. The average annual precipitation at the Boise Municipal Airport, located within a few miles of the service center, is 11.5 inches. Average seasonal snowfall is 23 inches. The prevailing winds in the immediate vicinity of the service center are from the southeast, though northwesterly winds prevail over most of the Ada County area.

Boise is located in the Idaho Batholith subdivision of the northern Rocky Mountain province; specifically, the city of Boise is located in the Boise River Valley. This area is characterized by a low to moderate gradient and three major alluvial terraces. All regional drainage is to the Boise River.

The service center is located on soils of the Elijah silt loam type. This moderately deep soil is well drained and is primarily alluvial in origin. The elevation at the service center is 2,940 feet above sea level and the slope in the area is 0 to 2 percent. The service center is not in the 100-year flood plain as indicated by the flood plain map in Appendix C.

Boise supplies the service center with water through a 12-inch line on Supply Way. The city of Boise also maintains a sanitary sewer line through the industrial park. Surface drainage is accomplished through drainage ditches, which are located on Supply Way and Gowen Road. The municipal water supply is obtained from the Boise River through a system of three dams upstream from the city of Boise.

The Boise Industrial Park is located southeast of the Boise International Airport and no known drinking water wells, schools, parks, critical habitats or wetlands exist within one quarter mile of the service center.

The non-building areas of the facility are paved with asphalt, concrete or gravel as noted on the site plan in Appendix C. The majority of the vehicular traffic and loading/unloading operating occur at and near the return and fill station and this area is paved with asphalt and concrete. The entrance to the facility is on Supply Way, which is the major access road to the facility. Gowen Road has a daily traffic volume of 7767 vehicle the large portion of which are trucks. Gowen Road was designed and built to sustain a load of over 78,000 lbs. per axle weight according to Ada county road engineering. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The trucks that daily travel the routes between the facility and its customers use the two-lane approach

driveway. The trucks dispatched from the recycle center, to pick up and deliver used and fresh solvent, perform these activities at the aboveground tank area.

1.2.2 Waste Management Practices

The Boise service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The aboveground storage tanks, container storage area, return and fill station, and the paint waste shelter all have secondary containment and the facility has the equipment necessary for employees to safely manage wastes onsite. Appendix C contains drawings of the waste management facilities. Spent parts washer solvent from parts washers is accumulated in a 12,000-gallon aboveground storage tank via the return and fill station. USDOT-approved containers of spent parts washer solvent are collected from customers, returned to the facility, and poured into the dumpster at the return and fill station. The drum washer located inside of the dumpster is part of the dumpster system and does not replace it. The material is then pumped into the spent solvent storage tank. The return and fill station has secondary containment in the form of six interconnected metal pans with an overall dimension of 29.54' x 10.83' x 0.479' with a 1038 gallon capacity.

The aboveground tanks have been designed in accordance with NFPA standards and are constructed of carbon steel painted a light color to reflect sunlight. The secondary containment is a steel reinforced concrete dike measuring 48.5' x 20.5' x 3.00' which holds a total of 14,620 gallons. The tank farm contains three 12,000 gallon storage tanks, one of which is permitted for storage of hazardous wastes (spent solvent tank); one of the remaining tanks is used for storage of products, while the other tank is currently not in use. Each tank is equipped with an audible and visible high level alarm. Additional tanks may be installed in the future. The permit will be appropriately modified, if additional hazardous waste storage tanks are installed.

The used containers returning from the customers filled with spent parts washer solvent are poured into the drum washer located within the dumpster. When the machine is turned on a stream of solvent is sprayed into the container, cleaning it. At the end of the wash cycle a small volume of product is spayed inside of each drum to have the last material sprayed in the drums be nonhazardous material. The used solvent goes to a sump in the bottom of the dumpster and is automatically pumped to the tank. There is a basket in the sump, which protects the pump by

filtering out large particles and collects the sediment. As needed this basket is removed and the sediment is placed in a container for recycle. The dumpster/ drum washer is emptied after every shift. Waste is not accumulated or stored in the dumpster. (See Appendix E-11 for exhibits). Please note that the drum washer is part of the dumpster and does not replace it

The container storage area in the warehouse is used for the storage of (1) sediment collected from cleaning the dumpster in the return and fill shelter and other branch generated wastes, (2) spent immersion cleaner, (3) dry cleaning wastes, (4) paint waste, and (5) aqueous solvents. Non-hazardous material, wastes that are not regulated as hazardous per IDAPA 58.01.05.004 [40 CFR 260] (including transfer wastes) and Safety-Kleen products may also be stored in the container storage areas. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes.

The container storage area has secondary containment in the form of a six-inch wide by four-inch high steel reinforced concrete curb with two collection trenches with a combined capacity of 529 gallons. One trench is located at the rollup fire door, 11.68' x 3.33' x 1.75' (509 gallons) and the second at the man-door entrance, 3.47' x 0.83' x 0.93' (20 gallons). No more than 4,464 gallons of permitted waste will be stored in the drum storage area at any time. Paint wastes will be placed in USDOT approved containers at the customer's place of business. The containers are palletized and stored in the warehouse or enclosed metal shelter shown in Appendix C. This structure has secondary containment in the form of six interconnected metal pans with an overall dimension of approximately 16.87' x 18.95' x 0.479' (1,210 gallons); no more than 2,592 gallons will be stored at any given time.

Paint wastes, and excess Spent Mineral Spirits will be placed in DOT approved containers at the customer's place of business. The containers are palletized and stored in the enclosed metal shelter shown in Appendix C. This structure has secondary containment in the form of six interconnected metal pans with an overall dimension of approximately 19' x 16.75' x 0.5' (1,210 gallons); no more than 2,592 gallons will be stored at any given time.

Containers will be stored, maintaining at least two feet of aisle space. Containers will be placed on pallets and moved with a forklift or pallet jack whenever possible. Containers placed on pallets may be stacked no more than two high (approximately 6 feet, 6-inches high).

2.0 WASTE ANALYSIS PLAN
ABSTRACT

Waste Description	Facility Capacity[2]	Annual Amount[1]
Parts Washer Solvent Waste (Spent Mineral Spirits and Aqueous Cleaning solutions)	12,000	470
Bottom Sediment From the Tank	N/A	15
Dumpster Sediment	4,464[3]	6
Spent Immersion Cleaner	4,464[3]	4
Dry Cleaning Waste	4,464[3]	10
Paint Waste	4,464[3,5]	4
Oil Retain Samples	4,464[3]	1
Used Aerosol Containers	4,464[3]	1
Branch Debris	4,464[3]	2

1 The annual amount is in thousands of gallons.
2 The facility capacity is in gallons
3 The total amount of drummed waste stored in the warehouse will not exceed 4,464 gallons.
4 See table in section 1.0 for waste codes.
5 Waste stored in the Paint shed shall not exceed 2,592 gallons.

2.0 WASTE ANALYSIS PLAN

2.1 DESCRIPTION OF WASTES

Several types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. Analytical data for the wastes is included in Appendix D and qualitative descriptions follow. The annual amounts shown in this section are estimates based on business projections, and are not maximum amounts. The maximum permitted storage volumes, which are based on nominal storage tank volume, or capacity of secondary containment for containerized waste storage are listed in the waste analysis plan abstract table. The Waste Analysis Plan only applies to waste collected from small and large quantity generators.

2.1.1 Wastes Resulting from the Parts Washer Service

Spent parts washer solvent from parts washers is accumulated in a 12,000-gallon aboveground storage tank via the return and fill station. USDOT-approved containers of spent solvent are poured into a dumpster/drum washer at the return and fill station which in turn empties into the tank. The appropriate codes will typically be based on Safety-Kleen's annual recharacterization study. This waste handling method results in three types of parts washer solvent waste:

a. Spent parts washer solvent--The spent parts washer solvent (which may include several types of hydrocarbon-based solvents and aqueous solvents) is removed from the tank by a tanker on a scheduled basis. For appropriate waste codes see Section 1.0, Table. The Boise facility will ship spent solvent to a Safety-Kleen recycle center, contract reclaimer or another facility appropriately permitted to accept the waste for reclamation.

b. Bottom sediment in the tank--Periodically, it is necessary to remove sediment and other heavy material from the bottom of the tank. A vacuum truck is typically used for this purpose. For appropriate waste codes see Table in Section 1.0.

c. Dumpster sediment--Sediment also accumulates in the bottom of the dumpster in the return and fill station. This sediment is removed, containerized, and placed in a container storage area of the warehouse. The chemical composition of this waste is analogous to that of the bottom sediment from the tank. The facility will then ship this material to a Safety-Kleen recycle center, contract reclaimer, or other appropriately permitted facility. For appropriate waste codes see Table in Section 1.0.

d. Branch Debris--Solid and liquid debris wastes are accumulated at the return and fill station or are created when performing routine parts cleaner services at client sites. Typically, wastes such as absorbents, PPE, stones, liquids, etc. are placed in satellite accumulation in the return and fill area, but this material may also be combined with the drum washer/dumpster unit sediment. When the container is full it is moved to one of the container storage areas. For appropriate waste codes see Table in Section 1.0.

Immersion is another type of parts washer solvent that is managed in containers. Containers of spent immersion cleaner are placed in a container storage area of the warehouse. Immersion cleaner remains in the container in which it was originally used until it is received at the recycle center. For appropriate waste codes see Table in Section 1.0.

2.1.2 Wastes Resulting from the Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, separator water and still bottoms. These wastes are packaged on the customer's premises in containers meeting USDOT specifications. The containers are then placed in the container storage area of the warehouse. Per the CDC the use of perchloroethylene (F002) dropped from 86% in 1980 to 70% in 2007. The use of perchloroethylene has continued to decline. Dry Cleaning Naptha (D001), Liquid Carbon Dioxide (Non-hazardous) and decamethyl-cyclopentasiloxane (Non-hazardous) take most of the remaining market share. For appropriate waste codes see Table in Section 1.0.

Dry cleaner separator water results from the distilling of spent perchloroethylene. Separator water is typically less than 10% perchloroethylene; however, is normally handled as F002 waste at this facility.

2.1.3 Paint Wastes

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers meeting USDOT specifications at the customer's place of business and the containers are then palletized and stored in an enclosed metal shelter. For appropriate waste codes see Table in Section 1.0.

2.1.4 Spent Aqueous Cleaning Solution

Spent Aqueous Cleaning Solution is a by-product of brake cleaning and/or parts washing processes involving aqueous based solution. Safety-Kleen has determined Spent Aqueous Cleaning Solution to be consistently non-hazardous. However, when chlorinated solvents are shown to be used prior to washing the parts in their aqueous parts washer Safety-Kleen feels it is prudent to manage these aqueous cleaner solutions as hazardous, unless generator and/or Safety-Kleen analytical data proves the waste may be managed otherwise.

Appendix D-4 provides results from in the analytical study performed by Safety-Kleen Systems, Inc. (SK) to demonstrate that spent *Aqueous Parts Washer Cleaning Solution (APW)* can be characterized and managed as RCRA non-hazardous when:

- Used in accordance with manufacturer's instructions, and
- Used under conditions in which RCRA regulated constituents won't be introduced at concentrations that exceed a regulatory threshold.

In accordance with U.S. EPA's SW-846 Chapter 9 (September 1986) guidance document on waste characterization, the following steps were taken:

- Representative samples of APW were pulled from 112 random SK customers

- Samples were submitted to an accredited 3rd party laboratory for TCLP analysis utilizing EPA SW-846 methodologies
- A nonparametric 90% upper confidence limit (UCL) for the 50th percentile of the analytical data distribution was calculated and values compared against the RCRA TC regulatory limits.

The Table in Appendix D-4 summarizes the statistical evaluation and resulting RCRA non-hazardous disposition for spent APW.

Safety-Kleen receives the Spent Aqueous Cleaning Solution in a variety of USDOT approved containers. The containers will be stored in the warehouse or transfer area (if nonhazardous) and may be bulked into larger USDOT approved containers for ease of shipping and storage. Any hazardous containers manifested to the site are placed in the container storage area of the facility, prior to shipment to a permitted storage, or treatment/recycle center. The Spent Aqueous Cleaning Solution is compatible with other parts washer solvents. If the aqueous solution is placed into the spent solvent storage tank, the solvent will be shipped via tanker to a Safety-Kleen recycle center, contract reclaimer, or other facility permitted to accept the waste.

2.2 QUALITY CONTROL PROCEDURES

The used solvents managed at the Boise facility are the primary feedstocks for the generation of Safety-Kleen products. As a result, quality control of the used materials is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects spent solvents from numerous customers, most of whom are conditionally exempt small quantity generators, and approximately 10,000 containers containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

A copy of Safety-Kleen's 2013 Annual Recharacterization Data is included in Appendix D. This information comes from a variety of Safety-Kleen facilities across the country and is representative of the Boise facility.

Furthermore, as discussed earlier in the Facility Description, all the materials collected at the Boise service center are collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

In accordance with IDAPA 58.01.05.008 [40 CFR 264.13], and the Idaho Hazardous Waste Management Rules, Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the customer's process or operation generating the waste has changed, or when the result of inspection indicates that the waste received at the Facility does not match the waste designated on the accompanying manifest or shipping paper. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been done or the material must be rejected. Samples from suspected non-conforming material will be collected using a Coliwasa tube following procedures in "Samples & Sampling Procedures for Hazardous Waste Streams" EPA –600/2-80-018. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

Safety-Kleen controls the use and management of its solvents by:

1. Limiting the solvents stored to those compatible with one another and their containers.

2. Limiting the uses of each type of solvent (for example, dry cleaner waste is only collected from dry cleaners);

3. Determining the customer's type of business (i.e., their SIC code is recorded) and the purpose for which they will use the machine.

4. Training customers to use the machines properly;

5. Training employees to inspect spent solvent and determine whether it is acceptable;

6. Indicating on the service document, every time waste is collected, whether the spent solvent meets Safety-Kleen's acceptance criteria;

7. Marking each container with the customer's name, address and EPA I.D. number (if required). This information remains on containerized waste until it is accepted at the reclamation facility;

8. Keeping a record of each incoming and outgoing shipment in the operating log at each facility.

9. The containers of spent immersion cleaner, dry cleaning, and paint wastes collected at the Boise Facility will not be combined with any other containers of wastes, i.e., they are to be stored and transported in the original containers in which they were collected.

Safety-Kleen's customers sign a service document containing the following information:

a. The name, address and EPA I.D. number of the facility to which the waste is being shipped;
b. The customer's name, address and EPA I.D. number (if required); and
c. The description and amount of Safety-Kleen solvent waste generated.

In addition, each incoming and outgoing shipment is recorded in the facility's operating records.

Based on known waste characteristics, Safety-Kleen has established the specific acceptance criteria set forth in section 2.2.1, to be used by Safety-Kleen personnel in their visual inspections. These acceptance criteria provide reasonable assurance that the wastes picked up are not contaminated. If a particular drum of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) sample the waste for testing at a Safety-Kleen approved laboratory to determine if the waste has been contaminated or (2) reject the waste. In the event the waste in question is rejected at the client's request and not sampled, Safety-Kleen will keep a record of it at the Boise branch which will be available to the Idaho Division of Environmental Quality upon request.

If the customer requests Safety-Kleen's assistance, a sample will be taken using a COLIWASA tube and it will be analyzed for flash point and volatile organic compounds. If this analysis does not adequately define the constituents, additional analysis will be performed as necessary. If a particular container of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) obtain a representative sample for the purposes of obtaining a detailed physical and chemical analysis in accordance with to the procedures outlined in Tables D-1 through D-4 in conjunction with any and all other test methods necessary to determine whether the waste which was to be received matches the identity of the waste which was specified on the generator's manifest or shipping paper. After obtaining the sample, the Safety-Kleen service representative shall seal the drum and label it has hazardous waste. The drum is then left with the customer pending the results of the detailed physical and chemical analysis, or (2) reject the waste. The waste will be rejected if any constituent is found which has not be identified or if the constituent concentration is outside the concentration range. If it is not acceptable, it will be manifested and shipped directly to a properly permitted reclamation or disposal facility. The costs of any sampling and testing performed as a result of the waste failing to meet the acceptance criteria will be borne by the customer.

a. General Inspection Procedures

Safety-Kleen visually inspects each drum of waste when it is collected at the customer's location. Safety-Kleen examines the waste for volume, appearance, and consistency at the customer's location and is intimately familiar with the characteristics of the waste it receives. Based on the known waste characteristics, Safety- Kleen established the specific acceptance criteria set forth below, to be used by Safety-Kleen personnel in their visual inspections. These acceptance criteria enable Safety-Kleen to ensure that the waste being picked-up is not contaminated.

b. Waste Specific Criteria

The following is a description of the specific acceptance criteria for each waste stream.

2.2.1. Spent Parts Cleaner Service & Immersion Cleaner

Prior to leasing a parts cleaning machine, the customer's business activity is reviewed. Where

the possibility exists for contamination of the parts cleaner solution (e.g., pesticide, herbicide or pharmaceutical operations), the process is reviewed to insure that the solution is protected from the sources of contamination.

Sales representatives are instructed to visually examine the spent solution when the machines are serviced, noting the quantity, odor and appearance of the material recovered as follows:

a. The quantity of used solution in the drum - When the amount of parts cleaner material or immersion cleaner liquid is more than 25% greater than originally supplied, the container will not be accepted. Contingent on the customer's responses to Safety-Kleen's inquiry of the customer's operation and handling practices, the material is accepted or left with the customer until an analysis is completed to determine its acceptability.

b. The odor of the liquid in the container - Personnel must never make an effort to "sniff" the solution. However, if in the normal course of servicing the customer, if the odor of the liquid in the container is noticed to be different from that of parts cleaner material or immersion cleaner, the container will not be accepted. Contingent on the customer's responses to Safety-Kleen's inquiry of the customer's operation and handling practices, the material is accepted or left with the customer until an analysis is completed to determine its acceptability.

c. The appearance of the liquid in the drum - Although the spent parts cleaner material is normally greenish-brown, certain contaminants containing dyes and color pigments (such as transmission fluid, printer's ink, and water-based paints) may change the color of the spent parts cleaner material to other colors. Should unusual colors be observed this must be explained clearly. Spent immersion cleaner should have a dark brown to almost black appearance. The immersion cleaner is a single-phase liquid. Liquids in the containers which deviate from the above description or which contain substantial amounts of water, high density solvent and/or oil at the bottom will be set aside for an analysis to determine its acceptability. Aqueous parts cleaner waste should have a light brown to black appearance depending on level of use.

At the service center, the sales representative or the material handler again observes the quantity, odor and appearance of the material prior to emptying the parts cleaner material into the drum washer. Drums with questionable contents are rejected and returned to the customer. The immersion cleaner containers are never opened at the service center, so additional verification is not possible until it reaches the recycle center.

2.2.2. Dry Cleaner Wastes

Dry cleaner wastes consist of spent filter cartridges, powder residue and still bottoms. Comparable to the handling of immersion cleaner, the drums are not reopened until they reach the recycle center, it is only when the drums are open upon arrival at the generator's site are these visual observations made.

I. Spent Filter Cartridges

When the sales representative inspects the drum for spent filter cartridges, he first inspects the drum to ensure it is in good condition before he inspects the consistency of the cartridges. Spent Filter cartridges are placed in USDOT approved containers. The service representative observes the spent filter cartridges for any observable foreign material, which may have been thrown into the container, which are not specifically, spent filter cartridges. It is obvious to the service representative whether the items in the drums are filter cartridges.

If the amount of the liquid is greater than approximately one inch or if the liquid is a color other than light brown, the Safety-Kleen service representative will either: (1) obtain a representative sample for the purpose of obtaining a detailed physical and chemical analysis. This analysis shall be performed according to the procedures outlined in tables D1 through D-4 in conjunction with any and all other test methods necessary to determine whether the waste which was to be received matches the identity of the waste which was specified on the generator's manifest or shipping paper. After obtaining the sample, the Safety-Kleen service representative shall seal the container and label it as hazardous waste. The container is then lefts with the customer pending the results of the detailed physical and chemical analysis, or (2) reject the waste.

II. Powder Residue

When the sales representative inspects the drum for the powder residue, he first inspects the container to make sure it is in good condition before he inspects the consistency of the powder to check if the drum may have been tampered with. The criteria for the acceptance of powder residue are consistency and color. A container of powder residue should not contain any liquid. If there is any liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

The powder residue is also inspected for color and should appear to be grayish-black. If the residue is not grayish-black in color, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste. After obtaining the sample, the Safety-Kleen service representative will seal the container and label it as hazardous waste. The container is then left with the customer pending the results of detailed physical and chemical analysis.

III. Still Bottoms

When the sales representative inspects the container for still bottoms, he first inspects the container to make sure it is in good condition before he inspects the consistency of the still bottoms to check if the drum may have been tampered with. The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The sales representative will observe for the following characteristics. The waste should have a highly viscous, tar-like consistency. If the color of the waste is not brown, dark brown, or black in color or if the waste does not appear to be still bottoms, waste dry cleaning solvent or water generated from the dry cleaning process, the Safety-Kleen service representative will either: (1) obtain a representative sample for the purpose of obtaining a detailed physical and chemical analysis. This analysis shall be performed according to the procedures outlined in tables D1 through D-4 in conjunction with any and all other test methods necessary to determine whether the waste which was to be received matches the identity of the waste which was specified on the generator's manifest or shipping paper. After obtaining the

sample, the Safety-Kleen service representative shall seal the container and label it as hazardous waste. The container is then left with the customer pending the results of the detailed physical and chemical analysis, or (2) reject the waste.

2.2.3. Paint Wastes Collection Service

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste.

I. Lacquer Thinner Waste

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in 5-gallon containers. The paint gun-cleaning machine operates as a closed system whereby there should not be a combined volume of more than 7 1/2 gallons of solvent in the two collection containers, with a ½ gallon variance allowed for solid accumulation. The solvent is pumped from a tube in a left-hand container (facing the machine) through the machine into a right hand container. The tube in the left-hand container extends exactly half way into the pail (i.e. to the 2 1/2-gallon mark). The left-hand container starts with 5 gallons of clean solvent that will be pumped out as the machine is used to clean the spray guns. This process will continue until the left hand container contains 2 1/2 gallons of solvent. Any solvent above 2 1/2 gallons remaining in the left hand container at the time of servicing will be pumped through the machine into the right hand container by the Safety-Kleen service representative. Therefore, when the machine is serviced, the right hand container will typically contain 5 gallons of solvent. If a service representative discovers more than a total of 7 1/ 2 gallons of solvent in the two containers, plus the variance of up to ½ gallon for paint solids, or there is an overfill from the right hand container that the generator cannot satisfactorily explain, the Safety-Kleen representative will either: (1) obtain a representative sample for the purpose of obtaining a detailed physical and chemical analysis. This analysis shall be performed according to the procedures outlined in tables D1 through D-4 in conjunction with any and all other test methods necessary to determine whether the waste which was to be received matches the identity of the waste which was specified on the generator's manifest or

shipping paper. After obtaining the sample, the Safety-Kleen service representative shall seal the container and label it as hazardous waste. The container is then lefts with the customer pending the results of the detailed physical and chemical analysis, or (2) reject the waste. When the Safety-Kleen service representative inspects the container for paint waste, he first inspects the drum to make sure it is in good condition before he inspects the paint waste to check if it may have been tampered with. Paint waste can only be added to a Safety-Kleen drum via a special bunghole at the top of the container.

II. Paint Waste

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. If the level of solids is in excess of 30 percent and the Safety-Kleen service representative will reject the waste. In these cases the waste will be profiled by the generator as high solids paint containerized waste.

The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is significant amounts of water the waste will be rejected. The container is sealed and the sales representative will ensure the seal is closed tight to prevent anyone from contaminating the contents.

2.2.4 Generator Waste Determination & Characterization

The foundation for ensuring proper management of waste lies with a proper hazardous waste (HW) determination. Requirements for conducting a hazardous waste determination can be found at IDAPA 58.01.06 and 40 CFR 262.11 and 262.40(c). It is a generator's responsibility to determine if its waste is hazardous under federal and State of Idaho law. Generators of a waste must determine if their waste meets one or more of the federal/Idaho standards that can make it a hazardous waste.

A generator can complete a hazardous waste determination by using either:

- Knowledge of the waste generation materials/processes; and/or
- Chemical and physical analysis of the waste stream.

If a generator desires, Safety-Kleen will assist in documenting their knowledge of the materials/processes using the Generator Waste Determination & Characterization form in Appendix D-3. Depending on the type of materials/processes they use, they may be required to have a representative sample of their sump/vacuum (Vac) or used solvent tested. If a sample is required for testing, the Safety-Kleen representative will arrange for this testing as part of the waste characterization documentation. The choices open to our non-hazardous waste generator customers in Idaho include:

A. Switch from non-hazardous waste service to a hazardous waste (HW) service (this works for everything but Vac service wastes); there should be no significant disincentives in Idaho to managing their waste as a HW (e.g., no extra taxes, manifest fees, etc.)
B. Fully document (using a new 3-page customer waste characterization form with support from the SK professional) the materials/processes generating the waste ***for each non-haz waste stream*** and thoroughly explain how all toxic and hazardous materials are kept out of the wastestream by your operating and purchasing practices that are observed and documented by SK during the customer visit. Based on this on-site customer evaluation, there are two possible outcomes for a generator to decide at the time of the interview:
    1. The process generating the waste has been adequately demonstrated to be void of contamination by toxic and/or hazardous substances and "generator knowledge" is adequate to support a self-declaration of non-haz status.
    2. The process generating the waste does *not* adequately demonstrate that toxic and/or hazardous substances are kept out of this waste stream and "generator knowledge" alone is insufficient to support a self-declaration of non-haz status. Further options then include:
        a. If the generator desires, SK pulls a sample of this non-haz waste stream for analysis by a local lab which would ***typically*** call for:
            1. TCLP-Metals for non-haz Vac *but* any odor of solvent/thinner/gasoline/diesel will also require a TCLP-VOCs and Flashpoint testing,
            2. TCLP-VOCs & Flashpoint for Non-Haz Premium Solvent, and/or

3. TCLP-Metals for other solvents such as water-based Aqueous Solvent.

b. Customer elects to skip the sampling and lab testing process (perhaps to save cost) and simply goes to Option A above (switch to HW service – this works for all wastes except for Vac).

Some Vac waste customers may have recoverable used oil in their waste (e.g., oil/water separator waste), and the customer may elect to have the Vac waste shipped to a facility that recovers the used oil under 40 CFR Part 279.

2.2.5 Initial and Annual Process Description

Based on historical operating and analytical records, Safety-Kleen has determined that the characteristics of its customers' waste streams do not change from year to year. Nearly 80% of our customers are in the automotive aftermarket, and our records of analyses of these customers' wastes reflect that there has, in fact, been a continuing reduction in the trace levels of listed constituents in these spent materials. For core waste streams, Safety-Kleen will continue to use it Annual Recharacterization program to evaluate these materials.

2.3 WASTE ANALYSES AT THE RECYCLE CENTER

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. The following tables in Appendix D summarize a typical waste analysis plan practiced at the recycle center for the hazardous materials returned from the service center:

Table D-1	Parameters and Rationale for Hazardous Waste Selection
Table D-2	Parameters and Test Methods
Table D-3	Methods Used to Sample Hazardous Wastes
Table D-4	Frequency of Analysis

If based upon information or analyses obtained at anytime, the waste material is found to

be different from what was represented to be shipped, or it cannot be managed at the facility, a shipment acceptance may be revoked and the shipment rejected and returned to the generator or sent to an alternate facility for proper disposal. This may occur even after the manifest has been signed, the shipment unloaded and release of the transporter. The information review process covers the following items:

1. Safety and health provisions;
2. Permit limitations and conditions;
3. Process capability and availability;
4. Compatibility of the material to the facility storage and operations;
5. Storage volume availability;
6. Generator Name and ID;
7. Transporter name and ID;
8. Facility Name and ID;
9. DOT Waste Description;
10. U.S. EPA Waste Code;
11. Quantity;
12. Primary Analytical Results;
13. Secondary Analytical Results;
14. State Specific regulations;
15. Notice of Land Disposal Restrictions (if applicable).

2.4. QA/QC Program

2.4.1 Goal of the Program

The analytical data collected by the service center personnel is intended to confirm the wastes collected may be safely managed onsite and that they match the descriptions on the accompanying manifest(s). Quality assurance and quality control will be followed as described in the appropriate test method(s) in SW-846.

2.4.2 Performance Evaluation of Personnel

The Branch Manager and any employees who will be sampling will receive training on the proper procedures for using the coliwasa tube, sampling the waste, and proper labeling and handling. The Branch Manager will in turn be capable of training any future personnel on proper sampling methods. Personnel who must sample and analyze wastes are trained to do so at least before they begin their jobs. Their performance will be evaluated and documented on the training record similar to that shown in Appendix G.

2.4.3 Specific Sampling Procedures

If any Safety-Kleen waste stream fails any of the acceptance criteria, the customer may choose to have his waste sampled by a Safety-Kleen service representative. Samples are taken from the USDOT approved container using a COLIWASA tube. The COLIWASA tube is a long plastic tube approximately 1" in diameter, which is resistant to and compatible with all of the Safety-Kleen waste streams. The service representative presses a lever on the top of the tube and inserts the COLIWASA into the container. The liquid in the container fills the tube and when the lever is released, a stopper at the bottom of the tube goes into place trapping the liquid inside of the tube. The sample is then transferred from the COLIWASA tube to a Safety-Kleen sample jar by once again pressing and releasing the lever. The service representative should note that the top edge of the sample jar must be clean of residue and ensure that a good seal with the cap. The Teflon lined cap will be hand tightened securely on the jar. The jar will be wrapped with a shipping tape and a label affixed to the jar. The jar will be boxed upright and the proper shipping labels attached to the

box. The sample will be properly handled and shipped according to USDOT regulations. Note that the DOT and RCRA do not require that samples of hazardous wastes be shipped as a waste material. The sample will be transported to the Safety-Kleen Technical Center, or an approved outside laboratory for analysis while the container remains sealed at the customers business. The sample will be analyzed according to EPA's test methods for evaluating solid waste (SW-846).

While a COLIWASA tube is the most common equipment used by Safety-Kleen other approved sampling equipment, such as a drum thief or a scoop may be used when appropriate.

2.4.4 Chain of Custody Procedures

Properly labeled samples will be collected as received at the Technical Center Lab. Chain of custody paperwork will be required. Records of analytical results (customer name, date sample was collected and analyzed and the analytical results) will be kept on file at the service center.

2.4.5 Use of Outside Laboratories

Outside laboratories may be used for sample collection and analysis. These laboratories must follow SW-846 methods for sampling, chain of custody and analysis (see tables D-1 through D-4). Samples must be disposed of or otherwise managed in accordance with IDAPA 58.01.05.006, 007, and 008 [40 CFR 262, 263, and 264].

2.4.6 Analytical Results

Analytical results must be provided to the service center manager, and must be kept on file at the service center.

2.5 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste material is collected or when sampling and material management methods change. Modification to the waste analysis plan will be submitted to the Director of the Idaho Department of Environmental Quality per the requirements of IDAPA 58.01.05.012 [40 CFR 270.42]

2.6 LAND DISPOSAL RESTRICTIONS

In accordance with IDAPA 58.01.05.011 [40 CFR 268.7], Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

1. Printing the Notice language on the manifests - such as for core-business customers To branch shipments; or

2. Special forms for each regularly handled waste types (e.g., MS, IC, perc, Freon); or

3. A general form that must be completed for unique or non-standard waste streams. These wastes will only be handled on a transfer basis, in accordance with IDAPA 58.01.05.007 [40 CFR 263.12.]

The Notice is required paperwork at least annually for all Safety-Kleen waste types that require land disposal notification/certification. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility unless a copy was received on a prior shipment within a year. When a shipment with the proper Notice is received, the Notice is kept in the files of the receiving facility with the manifest shipping papers.

2.7 Waste Determination for Subpart BB and CC Compliance

For purposes of waste determination, this facility utilizes knowledge of the wastes described in Sections 2.1, 2.2, and 2.3 above. For those hazardous wastes that are managed on a transfer basis, outside of the permitted units, the subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers or waste certification notices to confirm waste determination for the generator or the

ultimate receiving facility.

Based upon this knowledge, it has been determined that most waste solvents managed in tanks and containers at this facility may display an average volatile organic concentration of greater than 500 ppm at the point of waste origination. Documentation of this knowledge is provided in Appendix D (waste characterization analytical results), as required in IDAPA 58.01.05.008 [40 CFR 264.1063(d) and 264.1083]. Therefore, hazardous wastes managed in tanks and containers at this facility shall be managed in accordance with applicable subpart CC standards.

3.0 SECURITY MEASURES

ABSTRACT

SECURITY MEASURES --The site is secured as follows:

a. There is a chain link fence with three strands of barbed wire around the facility.

b. Warning signs are posted at all entrances.

c. Locks are on all entrances to the warehouse, gates, and on the metal shelter.

d. Remote controls for all tank operations are inside the warehouse.

e. Site lighting is automatically controlled

3.1 SECURITY MEASURES

The facility is secured with a six-foot high chain link fence topped by three strands of barbed wire. All access gates are locked when the facility is unoccupied and warning signs stating "Danger - Unauthorized Personnel Keep Out" in both English and Spanish are maintained and visible from twenty-five feet are posted at the entrances. In addition, outdoor lights illuminate the area when necessary.

The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas. The waste management units are accessible only to Safety-Kleen personnel. Material can only be added to or removed from the storage tanks by activating the pumps, the controls for which are inside the warehouse. The pumps are not activated unless parts washer solvent product or waste is being added to or removed from the tanks by Safety-Kleen personnel. In addition, warning signs are posted on the return and fill station.

The overhead door to the paint waste shelter will be closed and locked during non-routine work hours unless containers are being added to or removed from the shelter. Warning signs are also posted on the shelter.

INSPECTION PLAN

ABSTRACT

INSPECTION PROCEDURES: See Appendix E-1 for a copy an example of the Facility Inspection Record.

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

a. Internal communications will be by voice, cell phone and intercom.

b. Telephones are available in the office and the warehouse.

c. At a minimum, fire extinguishers are available next to three exits in the warehouse and at the metal shelter for paint waste storage.

d. Water is available from the Boise Water Supply.

4.0 INSPECTION PLAN

4.1 INSPECTION PROCEDURES

The branch (i.e., service center) manager or his designee is responsible for carrying out and documenting the facility inspection (Appendix E-1) on a daily basis. Each must note any repairs that are needed and assure that they are completed. If facility personnel cannot carry out the repairs, the Technical Services Department at Safety-Kleen's corporate headquarters must be notified for assistance. Completion of repairs must also be noted on the Facility Inspection Report.

The area manager is the supervisor of several branch managers in a geographic area. The area manager, or designee must review the Facility Inspection Reports on a periodic basis to insure that they are properly completed and that any necessary repairs have been completed.

The facility inspection includes the following:

a) Tank inspections - At a minimum, each tank is inspected daily. The inspections include checks of the high level alarm and of the volume held in the tank. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. Leaking tanks will be removed from service until such time that repairs have been made and certified by a professional engineer, in accordance with IDAPA 58.01.05.008 [40 CFR 264.196]. When the tank used to store spent waste is 85% full; a pickup is scheduled with Safety-Kleen's Corporate Dispatch Department. The material must not exceed 95% of the tank volume at any time. The secondary containment for the tanks must be checked for cracks or other deterioration. Any damage to tanks (such as rust or loose fixtures) or secondary containment must be noted and repairs initiated. The standard repair process is listed in Appendix E-16.

Inspections are also conducted to comply with Subpart CC requirements. A copy of the Subpart CC Compliance Inspection Plan is included in Appendix E.

b) Solvent dispensing equipment - The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks and leaks) and proper functioning. The pumps, pipes and

fittings must also be checked for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired. Daily inspections are conducted of the solvent piping, flanges, valves, etc. in accordance with Subpart BB requirements. An equipment configuration plan and equipment inventory checklist, which may be used to conduct the inspections are contained in Appendix E.

c) Container storage areas - Container storage areas are inspected daily and the number and condition of the containers noted. The total volume of the spent solvent held in the container storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect containers must be placed in a container of adequate integrity. Finally, the containers must be properly labeled and marked in accordance with USDOT and Idaho hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, they must be repaired immediately or noted in the inspection forms until repairs are made.

d) Trucks - Each route vehicle and delivery truck must be inspected daily to insure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment must be on board, which may include sorbents, fire extinguisher, eyewash, first aid kit, reflector kits, chemical protective gloves, chemical protective aprons, and safety glasses.

e) Return/Fill Station Wet Dumpster - The wet dumpster/drum washer (in the return and fill station) must be inspected daily for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster. The leaking dumpster will be removed from service until such time that repairs have been made, in accordance with IDAPA 58.01.05.008 [40 CFR 264.196].

f) Safety equipment - The fire extinguishers must be checked to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed and the first aid kit and sorbents must be inspected for adequate content and accessibility. A list of required emergency equipment is in Appendix F-2.

g) Security - The operation of each gate and lock must be checked daily. In addition, the fence and warning signs must be inspected for deterioration on a weekly basis. In addition, each lock and warning sign on or in the warehouse (including access to the return and fill station and power source for the tank pumps) must be checked weekly.

4.2 SUBPART CC INSPECTIONS

Safety-Kleen has developed a Subpart CC Compliance Plan that details procedures to achieve compliance with Subpart CC requirements. The plan includes provisions for an annual visual tank inspection of the return and fill wet dumpster/ barrel washer tank, the waste solvent storage tank and vent system, as well as container inspections upon arrival at the facility and proper container management. The Subpart CC Compliance Plan is shown in section 9.

4.3 SUBPART BB COMPLIANCE

Safety-Kleen complies with Subpart BB requirements by inspecting the process piping and equipment. Each valve, joint, flange, pressure relief device, pump, etc. is inspected to insure the equipment is not leaking and is functioning properly. Open-ended pipes are capped when not in use. An example diagram of the facility's piping and equipment is contained in Appendix E. Process equipment is also included on the facility's daily inspection record.

5.0 PERSONNEL TRAINING

ABSTRACT

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

TIME OF TRAINING

Job Title	Prior to Working In Unsupervised Position	On the Job	Annually	When Regulations and/or Procedures Change
Branch General/Service Center Manager	X	X	X	X
Branch Administrator		X	X	X
Sales/Service Representative	X	X	X	X
Material Handler	X	X	X	X

5.0 PERSONNEL TRAINING

5.1 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to his job assignment. New facility managers must complete an introductory training program, with annual review and update thereafter. Appendix G contains typical information on the training program.

5.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

Environmental compliance and training of facility employees is the responsibility of the facility manager. The Safety-Kleen Corporate Office provides a training program to be executed annually. The training program includes instruction on hazardous waste management for facility personnel in accordance with IDAPA 58.01.05.008 [40 CFR 264.16 (a)(2)]. Example Job descriptions that highlight typical functions for branch personnel associated with hazardous waste management are in Appendix G.

5.2.1 Branch General or Service Center Manager

The Branch General/Service Center Manager serves as the overall facility manager and is ultimately responsible for the operations at the facility. The Middle Managers, sales representatives, secretaries, and Material Handler report to the Branch General/Service Center Manager. The Branch General/Service Center Manager must provide the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, he/she must:

a) Keep the facility clean and orderly;

b) Execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;

c) Know the potential hazards of the material and wastes handled on site;

d) Identify potential spill and fire sources and be able to execute the contingency plan;

e) Inform all employees of their environmental responsibilities;

f) Act in accordance with the contingency plan and notify the proper authorities during an emergency, remediate the situation to the best of his/her abilities, and submit necessary reports to the corporate office; and

g) Maintain all environmental records (such as manifests, training records, and analytical results and spill reports) on file.

5.2.2 Corporate Compliance Department

Safety-Kleen's Corporate Compliance Department has personnel on staff that provides guidance to divisional and regional personnel for training, permitting and other compliance issues for the Safety-Kleen facilities in a given geographic area of the country.

5.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training may be accomplished using classroom, CD, videotape, written, and on-the-job methods. The regional/corporate offices prepare a training program for employees and documents that the program has been executed.

An employee is trained prior to starting or as soon as he or she begins working unsupervised, (depending on his or her position), and annually thereafter. Example training program outlines are in Appendix G, which demonstrates that facility personnel are trained in hazardous waste management procedures.

5.3.1 Training of New Branch General or Service Center Managers

New Branch General and Service Center Managers are provided regulatory training before they begin their new positions. Their training includes on site, on-the-job, and offsite classroom training. While being trained, normally at a designated "training facility", the new Branch General or Service Center manager reviews all environmental records and learns the record keeping requirements. These records include: manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates with additional training at his/her new facility, at the direction of an

environmental professional. This training includes at a minimum, a review of the Part B Permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan. Additional time is spent reviewing past environmental compliance at the branch manager's facility and regulations unique to the state are discussed.

5.3.2 Training of New Branch Administrator

Branch Administrators are trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process it as required. Additional training is overseen by the branch manager, or other qualified personnel, and is done within six months of starting. It includes some of the items listed in the Training outline (Appendix G) that are applicable to the Administrator's job. In addition, the contingency plan must be reviewed with the Branch General / Service Center Manager, or other qualified personnel, within the first four weeks of the Administrator starting work.

5.3.3 Training of New Sales & Service Representatives

New sales and service representatives are introduced to the Part B permit which includes waste analysis plans, preparedness and prevention plans, contingency plans, etc. The standard beginning class for a sales or service representative is a 2 week HAZWOPER and beginning RCRA class at a Safety-Kleen training center. A sales and service representative may also be trained as the designee for performing the facility inspection. Additional training may be provided in the form of CD, online or videotape presentations. The contingency plan must be reviewed with the Branch General or Service Center Manager before the sales representative formally begins their new position and annually thereafter. Items listed in the example training outline (Appendix G) are explained within six month of starting. While an oil service representative and a vac service representative's training normally parallel a sales and service representatives training, they need not be on the same timeline as they do not handle hazardous waste.

5.3.4 Training of New Material Handlers

A material handler is trained to maintain the branch service center and assist the other

branch employees in their tasks. This person may also be a designee for the facility inspection and must be trained by the Branch General or Service Center Manager as such. Within four weeks of the material handler starting, the Branch General or Service Center Manager must review the contingency plan with him/her, and within six months the items listed in the example training outline (Appendix G) must be reviewed.

5.3.5 Annual Training

On an annual basis, employees are trained in the HAZWOPER update using a program prepared and updated annually by the Safety-Kleen regional and/or Corporate Compliance offices and Safety Department office. It generally includes updates on environmental regulations, an in-depth review of the contingency plan, other key aspects of the Part B permit and changes in regulations.

Facility employees must annually review training items such as those listed in the example training outline. This review may be in the form of online programs, safety meetings, or videotapes and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental & safety regulations are issued by the Regional and/or Corporate offices and must be read and discussed by facility personnel.

5.4 TRAINING RECORDS

Employee training is documented (see the example record forms in Appendix G). The training course syllabuses, training signature sheets and test results if given must be maintained on file at the facility. Employees may not work in unsupervised positions until the contingency plan has been reviewed and they understand emergency response procedures. Training records are kept until closure of the facility, and /or three (3) years from the date an employee is terminated form the facility, in accordance with IDAPA 58.01.05.008 [40 CFR 264.16(e)]. Records for employees transferring within the company will be sent to the employee's new facility.

ABSTRACT

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

a. Internal communications will be by voice, cell phone and intercom.

b. Telephones are available in the office and the warehouse.

c. At a minimum, fire extinguishers are available next to three exits in the warehouse and at the metal shelter for paint waste storage.

d. Water is available from the Boise Water Supply.

6.0 PREPAREDNESS AND PREVENTION PLAN

6.1 FACILITY DESIGN

The Boise service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents that may occur. Specifications for the storage facilities, secondary containment and other equipment are in Appendix E and descriptions follow.

6.1.1 Tank Storage

The 12,000-gallon storage tank is 10'6" in diameter and 18'8" high. It is constructed of 3/16" thick (1/4" thick in the lower three quarters of the tank) carbon steel and painted a light color to reflect sunlight. The tanks are constructed in accordance with Underwriters Laboratories Standard 142 and they are located more than 20 feet from the property line, in accordance with National Fire Protection buffer zone requirements. The tank is equipped with an aural (siren) and visual (strobe light) high level alarm system which will alert employees when the tank is approximately 95% of permitted capacity (approximately 11,400 gallons). In addition, the ancillary equipment will drain into the secondary containment system, should an overflow occur and the alarm fails.

The secondary containment for the tanks consists of a steel-reinforced concrete slab and dike wall. The slab is twelve inches thick with a four-inch tank pad and the wall is eight-inch thick steel reinforced concrete. Water stop details are shown in section C-1 of drawing D11322 in Appendix E. In addition, the dike is sealed with a penetrating coating of ChemTec One, or similar products, a reactive silicate that fills in the pores between the cement particles down to a depth of up to three inches.

The return and fill station is an integral portion of the storage tank system. It consists of a sheet steel structure as is the dumpster and the secondary containment. The dumpster is tight-piped to the 12,000 gallon spent storage solvent tank and all piping is above ground, and all piping joints are welded. A drum washer is located inside the dumpster. All ancillary equipment is properly supported and protected against damage and excessive stress.

6.1.2 Container Storage

The slab, curbing and collection trenches for the container storage area in the warehouse are made of steel-reinforced concrete. The concrete has been poured so that no cracks or gaps exist between them and is sealed with an impermeable reactive silicate such as ChemTec One. The curbing is four inches high and six inches wide and encompasses the storage area except where there is a trench. Steel grates cover the trench to facilitate the movement of containers across it.

The paint waste shelter and its secondary containment are constructed of sheet steel and it is painted light colors (white and beige) to reflect sunlight. An overhead door secures the shelter when containers are not being added to or removed from it.

The waste types permitted for storage (e.g. parts washer solvent, immersion cleaner, Aqueous cleaning solvent, dry cleaning waste and paint wastes are compatible with the containers in which they are stored. These wastes are stored in containers meeting USDOT specifications, and are placed on pallets whenever possible to facilitate shipping. The palletized containers may be stacked while in storage and during transport.

The containment trenches/sumps in the container storage areas are closed and no piping is associated with them. Material contained in the trench/sumps may be collected using a wet/dry vacuum or equivalent method. Containers can be used as needed with this vacuum or liquid may be pumped directly into and removed by a tanker truck. Removal of any liquid in the containment trench/sump must take place within 24 hours of detection, weather permitting. Ice and snow may be left in place until a thaw allows removal. If no spills have occurred in the containment area and rainfall has accumulated, water without a visible sheen may be pumped to the parking lot holding pond. Material collected from spill cleanups will be treated as hazardous waste and may be recycled or properly disposed of.

6.2 PLANT OPERATIONS--POTENTIAL SPILL AND FIRE SOURCES AND CONTROL PROCEDURES

Employees must perform their duties in the safest, most efficient manner possible and the service center has been equipped to facilitate these activities. Containers will be moved using a handcart or placed on pallets and moved using a forklift or pallet jack. Upon arrival at the service center, containers of spent solvent must immediately be added to the storage tank or placed in the container storage areas, such as the paint shed. Open drums of solvent must not be left unattended. Below are descriptions of situations, which can result in accidents and the precautions, taken to prevent their occurrence.

6.2.1 Potential Minor Spill Sources

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

a) Pouring of containerized solvent into the dumpster - As the USDOT approved containers are poured into the dumpster, solvent can splash out. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by six interconnected metal pans. This design will contain this type of spill.

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

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

d) Delivery truck transfers - The cargo should be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on

or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary. If a spill does occur the amount of solvent in the containers is normally a quantity that can be collected with sorbent material or pads. Any contaminated absorbent that results (if any) will be removed manually, containerized, and shipped to a Safety-Kleen recycle center, or another facility permitted to accept the waste, for proper disposal.

6.2.2 Potential Major Spill Sources

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

a. Overfilling of storage tanks - Storage tanks for both products and spent materials tanks can be overfilled with a resulting discharge of solvent. A high level alarm, a Safety-Kleen employee always being in attendance during transfers, and daily checks of tank volumes will prevent this type of incident.

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

6.2.3 Potential Fire Sources

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

a) All wastes and products are kept away from ignitable sources. Personnel must confine smoking and open flames to remote areas (e.g., the office or locker room). The parts washer solvent handling area, paint waste shelter and the aboveground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

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

1. Become subject to extreme heat or pressure, fire or explosion, or a violent reaction. - The parts washer solvent waste is stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and containers kept at room temperature to minimize the potential for pressure build up. The paint waste is stored in an enclosed metal shelter that is separate from the office/warehouse. An automatic overhead fire control system is installed in this shelter.

2. Produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health - The vapor pressure of parts washer solvent is low (2 mm Hg at 68 degrees F) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization will be minimal under normal working conditions.

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion - See 'a' above.

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

c) Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

d) "No Smoking" signs are posted in areas where solvents are handled or stored.

e) Fire extinguishers must be checked once per week and tested by the fire extinguisher company once per year.

6.2.4 Tank Evaluation and Repair Plan

The wastes and products stored in the tanks at this facility are compatible with the carbon steel structure; in fact, mineral spirits is often used as a light hydrocarbon coating to prevent rusting of metal parts.

If during the daily inspection, corrosion is noted, and is significant but localized, the tank will be removed and repaired. (e.g., a patch welded over the corroded area). If major repairs to the tank system are necessary, they must be certified by an independent professional engineer, as indicated in IDAPA 58.01.05.008 [40 CFR 264.196 (f)], and in accordance with IDAPA 58.01.05.012 [40 CFR 270.11]. Should the corrosion of the vessel be extensive or if the tank is found to be leaking, the vessel will be immediately taken out of service and replaced. In the case of a tank which leaks outside of the dike, the facility's contingency plan will be initiated to insure the removal of any contaminated soil.

6.2.5 External Factors

The design of the installation is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside. Also, the container storage areas are in buildings that are inaccessible to unauthorized personnel.

a. Vandalism - Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.

b. Strikes - A strike would not result in a solvent spill or fire.

c. Power failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity (e.g. filling or emptying tanks or containers) will cease.

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

e. Storms or Cold Weather - The solvent return and fill station and container storage areas are roofed to eliminate the possibility of precipitation run-on. No opportunity is foreseen to affect the facility with snow, cold weather or storm water. Extreme cold weather would not result in a spill or fire. Any ice or snow that accumulates in the secondary containment will be removed within 24 hours after melting using equipment on site.

6.3 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS

Internal communication within the building and the solvent return/fill area is accomplished by voice and a loudspeaker paging system. Telephones and cell phones will be used to report a spill or a fire and to summon assistance from local and state emergency response agencies. Branch managers have emergency phone numbers of local and state emergency response teams posted by each phone located in the sales office. Included in these phone numbers is the 24-hour telephone number that can be used to contact Safety-Kleen Emergency Response Coordinators.

7.0 CONTINGENCY PLAN
ABSTRACT

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

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

EMERGENCY COORDINATOR: The facility manager is the emergency coordinator. The alternate emergency coordinators are listed in Appendix F-1.

EMERGENCY NOTIFICATIONS:

Boise Police Department	911
Boise Fire Department	911
St. Alphonsos Regional Medical Center	208/367-2121
Safety-Kleen Emergency Coordinator (24 hour)	800/468-1760
Idaho State EMS Communication Center	800/632-8000 - 24 hr. (in state)

7.0 CONTINGENCY PLAN

Safety-Kleen Systems, Inc.
6334 Supply Way
Boise Industrial Park
Boise, Idaho 83716

7.1 PURPOSE

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or ground water. The contingency plan is to be carried out immediately whenever there is a release of hazardous material that could threaten human health or the environment, implementing the procedures contained in this plan.

7.2 EMERGENCY COORDINATOR RESPONSIBILITIES

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or his alternate be unavailable. The facility manager is the emergency coordinator and the alternate emergency coordinators are designated by the facility manager and listed in Appendix F-1.

The emergency coordinator and alternates must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Appendix F-1. During non-working hours, at least one employee will be at the facility or on call to respond to an emergency situation.

7.2.1 Responsibilities During an Emergency

Whenever there is an emergency situation that requires implementation of the contingency plan, the emergency coordinator (or alternate) will:

a) Activate the internal facility communication system to notify all facility personnel,

b) Notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number - 800/468-1760, and

c) Notify appropriate state or local agencies with designated response roles, if necessary.

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

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

The emergency coordinator and alternates have been adequately trained to respond to an emergency. They have references such as various staff members at the corporate office and the Material Safety Data Sheets to help them make decisions during an emergency.

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

7.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Safety-Kleen's Emergency Response Coordinator to report the incident. Appropriate remedial actions will be implemented to address contamination resulting from an emergency situation. The treatment, storage and/or disposal of any recovered waste, contaminated soil or surface water that results from an emergency situation must be arranged by Safety-Kleen and carried out as expeditiously as possible.

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

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

b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

7.2.3 Reporting Responsibilities

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

a) If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.

b) The coordinator must immediately notify the Safety-Kleen Emergency Response Coordinator. The Safety-Kleen Emergency Response Coordinator will report the incident to the Idaho Division of Environmental Quality within 24 hours, including the:

1. Name and telephone number of notifier;
2. Name and address of facility;

3. Time and type of incident (e.g., release, fire);
4. Name and quantity of material(s) involved, to the extent known;
5. The extent of injuries, if any; and
6. The possible hazards to human health, or the environment outside the facility.

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

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

7.2.4 Chain of Command

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

a. The person who discovers/causes the spill reports to the Emergency Coordinator or alternate.
b. The Emergency Coordinator contacts the Safety-Kleen Emergency Response Coordinator.
c. Safety-Kleen's 24 hour Emergency Response Coordinators or the facility's emergency coordinator will contact the Idaho Division of Environmental Quality.

7.2.5 Government Agencies and Local Authorities to Be Notified

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

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
IDEQ	Report releases and fires.
Safety-Kleen Emergency Coordinator	Call to assist with remedial action after a release.

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

7.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections that follow. Employees must assess the possible hazards to human health or the environment resulting from a release or fire by visually inspecting the area, reviewing Material Safety Data Sheets for the material released, and estimating the extent of the release and identifying the material to

which it was released (e.g., soil, waste and/or air). Hazards must be assessed to make relevant decisions as to the appropriate personal protective equipment necessary to respond to an emergency.

7.3.1 Minor Spills

Minor spills that occur within secondary containment, and do not involve a release of material to the environment normally do not require implementation of the contingency plan. However, procedures for addressing minor spills are summarized in this section. If a spill should occur while pouring spent solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, the material will be collected and appropriately managed. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a) If the material spills on a paved area, it will generally be collected with a wet/dry vac, pump, sorbent sheets, and/or granular absorbent. The free liquids (if any) and/or sorbents will be containerized and shipped to a Safety-Kleen recycle center for proper treatment and disposal.

b) .If the material spills on an unpaved area, attempts to recover any free liquids will be employed as in "a" above. Free liquids, sorbent material, and any contaminated soil must be containerized and shipped to a Safety-Kleen recycle center, or if necessary, to another facility that is permitted to accept the materials for treatment/disposal.

If a spill occurs while moving or delivering containers outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse and the metal paint waste shelter will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoor, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. Then, following the

instructions of the appropriate Material Safety Data Sheet (Appendix F-5), the worker will enter the area wearing appropriate personal protective equipment and containerize the liquid, and return it to storage. Up to date MSDSs are readily available on Safety-Kleen web site.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator. The Safety-Kleen Emergency Response Coordinator will contact the IDEQ, if required.

7.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section 7.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material from this type of release can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

a) Assist any injured people.

b) Stop the flow of material, if possible.

c) Retain, contain or slow the flow of the material if it can not be stopped.

d) If material escapes containment efforts immediately call the local Fire Department, and report to the emergency coordinator (or alternate) and the Safety-Kleen Emergency Response Coordinator.

e) Immediately recover to the extent possible, the spilled material to reduce property and environmental damage. Material resulting from a release, fire, or explosion may be stored onsite in containers or in tanks to the fullest extent possible. Material which cannot be contained using the storage facilities on site may be contained in tanker trucks or containers provided by the recycle center or spill cleanup contractor, as necessary.

The emergency coordinator or alternate shall report any incident as soon as possible to the Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number: 800-468-

1760. The emergency coordinator or alternate may also be required to report the incident to the National Response Center (telephone: 800/424-8802) and IDEQ (telephone: 800/632-8000 - 24 hour number-in state). An emergency cleanup response contractor may be contacted, if it is deemed necessary.

Spills must be controlled and remediated to the fullest extent possible. However, personnel must not take health or safety risks; if there is any doubt as to whether a particular action is unsafe, it must be avoided. The flow of a released material may be stopped by turning off pumps, closing valves, righting tipped containers, or taking other appropriate actions. If the flow cannot be stopped, a berm should be formed by shoveling dirt or sorbent material around the free liquid to hold it in one place or at least direct it to the area where it will do the least amount of damage (e.g. secondary containment area in the warehouse or the tanker truck loading/unloading area).

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

Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Every spill must be recorded on the Field Spill Report Form (an example is provided in Appendix F). A copy of this report is sent to appropriate Safety-Kleen personnel. Spill report forms and other appropriate information are reviewed with branch personnel to prevent similar spills from occurring in the future.

7.3.3 Fire and Explosion Control Procedures

It is Safety-Kleen's policy that employees respond to incipient fires, those that can be immediately extinguished with a fire extinguisher. Any fire that cannot be immediately controlled, or which has the potential to become uncontrollable warrants implementation of the evacuation plan

and the proper authorities will be contacted.

If a small fire occurs, personnel must act quickly with the fire extinguisher to put out the fire before it spreads, where possible, without undue threat to personnel safety. If it can not be extinguished immediately, evacuate the facility and call the fire department. Potential guidelines for response authorities to consider during a fire are discussed below.

Vapors of mineral spirits exposed to a spark or open flame can flash at temperatures over 148 ° F. A mineral spirits fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. If there is a flow of solvent it should be stopped as quickly as possible.

Paint wastes, and waste solvents can generate carbon monoxide and other poisonous gases. Chlorinated solvents (industrial solvent wastes and dry cleaning wastes) are generally not flammable, but can produce toxic substances when exposed to very high temperatures (about 1200° F). Branch personnel and local authorities must be aware of the proper response, should a fire affect the container storage areas. Examples of potential response procedures are described below:

a) Isolate the hazard area and deny entry to unauthorized personnel.
b) Stay upwind; keep out of low areas.
c) Ventilate closed spaces before entering them.
d) Wear personal protective clothing
e) Evacuate a 1,000-foot radius area endangered by the gas.

A fire in the container storage area can best be extinguished by foam, water fog, or water spray (mist).

If a fire in or near the metal paint shelter occurs, a dry chemical, carbon dioxide or foam will best extinguish the fire. Cool the shelter and containers with water until well after the fire has been extinguished.

7.4 EVACUATION PLAN

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes. The signal for evacuation is either a verbal or loudspeaker announcement describing the hazard and the need for evacuation. An evacuation is necessary when a release, fire, and/or explosion has occurred or has the potential to occur, or has the potential to generate irritating vapors (it should be noted that the material handled by Safety-Kleen employees are skin and eye irritants at or below OSHA airborne concentration limits), toxic vapors, or deplete oxygen. In addition, a release, fire, or explosion which has the potential to injure personnel through physical contact or by damaging structures will necessitate evacuation.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble North of Gowen Road, at the Southeast corner of the Fire Training Field, to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

7.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

An emergency response contractor is identified on the Emergency Information sheet (Appendix F-1). This contractor will provide emergency assistance during a release and/or cleanup.

7.6 IMPLEMENTATION SCHEDULE

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

7.7 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information sheet (Appendix F-1) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

a) The facility license is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;

b) The list or location of emergency equipment changes

c) The facility changes in its design, construction, operation maintenance, or other circumstances in a way that:

   1. Increases the potential for fires, explosions, or releases of hazardous constituents, or
   2. Changes in the response necessary in an emergency.

d) The names, addresses, or phone numbers of emergency coordinators change;

e) The employee assigned to each emergency task changes; or

f) The plan fails when implemented in an emergency

g) If the contingency plan is revised, the local emergency response teams will receive copies of the document.

Modifications to the Contingency Plan will be submitted to the Idaho Department of Environmental Quality in accordance to IDAPA 58.01.05.012 [40 CFR 270.42].

8.0 CLOSURE PLAN
ABSTRACT

LOCATION ADDRESS: Safety-Kleen Systems, Inc.
6334 Supply Way
Boise, Idaho 83716

U.S. EPA I.D. NO: IDD 981770498

WASTE UNITS TO UNDERGO CLOSURE:

a) Tank Storage - one 12,000-gallon aboveground storage tank and concrete dike area for secondary containment.

b) Drum Storage - in the warehouse with a storage capacity of 4,464 gallons.

c) Return and Fill Station – one return and fill dock structure with secondary containment and one wet dumpster/drum washer.

d) Paint Waste Shelter – The location of this structure is shown in the Site Plan. It has a storage capacity of 2,592 gallons.

8.0 CLOSURE PLAN

8.1 PURPOSE

The Boise service center operates as a storage facility for hazardous wastes. The hazardous waste management units (HWMUs) must be closed in accordance with the closure requirements of IDAPA 58.01.05.008 [40 CFR 264.110 through 264.115]. Closure of the facility HWMUs will be carried out in accordance with this plan. An itemized schedule is attached at the end of this closure plan. The closure cost estimate is included in Appendix H. Safety-Kleen will remediate any hazardous wastes from the facility to a level that is protective of human health and the environment. Upon completion of the closure activities, the need for further maintenance will be minimized or eliminated.

The HWMUs, which are subject to closure, are identified in the Closure Plan Abstract. The units include one aboveground storage tank system, a return and fill station and one wet dumpster/drum washer (considered ancillary equipment to the storage tank) one container storage area located in the warehouse, and a paint waste shelter. This closure plan identifies steps necessary to conduct facility closure, or closure of a unit (partial closure) at any point during its intended life.

8.2 SECONDARY CONTAINMENT, ABOVEGROUND TANK AND ASSOCIATED PIPING

8.2.1 Secondary Containment

The secondary containment area may be left in place after decontamination or removed. The following procedures will be used to decontaminate the containment area if it is to be left in place or removed.

An independent Professional Engineer will inspect the containment area dike and slab for the presence of cracks, fissures, missing seals, etc. If lapses of integrity are noted by the Engineer and determined to have the potential for wastes to migrate to underlying soils, soil samples will be collected in accordance with the procedures discussed in Section 6.6.

Visible cracks or gaps in the containment (if present) shall be sealed prior to commencement of cleaning to prevent migration of rinsate outside of the containment area. The containment dike will be washed using a non-phosphate detergent/water solution and high-pressure spray. Prior to pressure washing, the containment area surfaces will be sprayed with a non-phosphate detergent/water solution and scrubbed with a stiff-bristle broom. Areas with staining or scale will be scrubbed and/or scraped to remove residue to the extent practicable. A high-temperature pressure washer unit will be used to perform the final decontamination activities. Following the final wash, the area will be triple rinsed with tap water. A sample of the final rinsate will be collected and analyzed for constituents representative of waste codes permitted for tank storage. The rinsate sample will be analyzed for volatile organic compounds (VOCs). If the VOCs concentration is less than 1 mg/L, the containment area will be considered decontaminated. Decontamination of the concrete will be repeated as necessary, until the 1 mg/L level has been met. The residual waste materials and rinsate, including precipitation that runs-on inside the containment area, will be collected within appropriate storage devices and managed as a hazardous waste in accordance with applicable regulations.

The wash/rinse water will be collected and shipped to a recycle center, reclaimer, or other permitted treatment/disposal facility. The quantity of wash/rinse water will be kept to a minimum to limit the amount of waste material.

If the containment area is removed, the concrete slab and dike walls will be broken into manageable sized pieces and transported to a concrete recycle or disposal facility. The area may be backfilled and graded as necessary to match surrounding elevation.

8.2.2 Removal of Waste Material and Opening of the Tank

The contents of the tank must be removed using a pump, vacuum or similar equipment and then be shipped to a recycle center, reclaimer or other permitted treatment/disposal facility. To gain access, the manway at the top or side of the tank will be used. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures. Confined space entry will be conducted in accordance with 29 CFR 1910.146. Tank entry procedures will be specified in the site health and safety plan. In all cases, personnel performing closure activities must have completed 40-hour OSHA hazardous waste training requirements (29 CFR 1910.120).

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

Procedures for purging or venting tanks are described in API RP1604 "Removal and Disposal of Used Petroleum Storage Tanks" and OSHA "Permit Required Confined Spaces" (29 CFR 1910.146). The contractor will monitor vapors to ensure the tank atmosphere has combustible gas concentrations of less than 10% of the lower explosive limit (LEL).

8.2.3 Cleaning and Decommissioning of the Tank

To safely clean and decommission the aboveground storage tank (one 12,000 – gallon used parts washer solvent tank), the following activities will be performed during partial or final closure (as appropriate):

a) Remove the remaining material from the tank and send the materials to a recycle center, reclaimer or other permitted treatment/disposal facility. The method used to remove the residual waste material from the tank will depend on the physical properties and quantities of that material.

b) Provide access to the tank. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible

c) Visually inspect the tank for evidence of leakage.

d) Pressure wash with detergent solution, scrape, squeegee (if necessary) and triple rinse the tank interior, removing all residual waste material and rinsate. The

wash/rinse water will be collected and shipped to a recycle center, reclaimer, or other permitted treatment/disposal facility. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

e) Disconnect and decontaminate all appurtenant piping and pumping equipment.

f) Visually inspect appurtenant piping, equipment or underlying surfaces for evidence of leakage (i.e. staining and residue). The piping will be decontaminated with a detergent-water solution, rinsed with tap water, and either reused or removed and cut into manageable sized pieces for disposal as scrap.

g) Remove tank, piping and appurtenant equipment for off site reuse or sell as scrap. The tank may also remain onsite for reuse after decontamination.

h) Transport and dispose of all waste material generated during the project.

During closure of the tank system, Safety-Kleen will remove or decontaminate waste residues including contaminated system components, structures, and equipment contaminated with waste. These materials will be managed as hazardous waste, until determined to be non- hazardous based on laboratory analysis.

8.2.4 Removal of the Tank

Following removal of wastes and decontamination activities, the tank may be reused onsite, or at an offsite location, or scrapped. If the tank is to be transported offsite or scrapped, the following procedures will be observed to safely remove the tanks:

a) Disconnect appurtenant piping.

b) Disconnect appurtenant pumping equipment.

c) If the tank is to be scrapped, the tanks and associated equipment will be removed and recycled in accordance with IDAPA 58.01.05.008 [40 CFR 261.1(c)(6) and (7)]. Verification of destruction will be provided by the contractor or scrap metal facility.

d) If the tank is to be reused following decontamination, the final rinsate will be sampled. The rinsate sample will be analyzed for volatile organic compounds. If the total volatile organic compound concentration is less than 1 mg/L, the tank will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed.

8.3 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return used parts washer solvent to the waste storage tank and to dispense clean solvent into containers. The return and fill station is an integral part of the storage tank system, and is considered as ancillary equipment to the used parts washer solvent storage tank. At closure, the sediment in the wet dumpster/drum washer will be removed containerized, labeled, and manifested for proper treatment and/or disposal through a Safety-Kleen Recycling Center, reclaimer or other treatment/disposal facility.

The dumpster/drum washer, dock area and metal secondary containment area will be washed with a detergent solution and rinsed. Visible cracks or gaps in the containment (if present) shall be sealed prior to commencement of cleaning to prevent migration of rinsate outside of the containment area. The rinsate may either be discharged through the appurtenant piping system into the storage tank (prior to cleaning and removing the storage tank), or contained within separate containers, vacuum truck, or other appropriate storage device. The piping and equipment decontamination activities may also be disconnected and individually cleaned within the return and fill station's metal secondary containment unit.

Following decontamination of the equipment, the metal containment area will then be decontaminated. Wash and rinse water will be collected from within the containment area and containerized. Wastes generated during closure of the return and fill structure will be transported to a permitted hazardous waste facility.

The clean dumpster/drum washer and dock structure will remain onsite for reuse or scrapped. If the return and fill dock structure or dumpster/drum washer will be reused, a sample will be collected of the final rinsate. The rinsate sample(s) will be analyzed for volatile organic compounds. If the total volatile compound concentration is less than 1 mg/L, the components will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed. If the return and fill station and/or components will be scrapped during closure, rinsate samples will not be collected.

Following decontamination, the secondary containment structure will be inspected by an independent registered Professional Engineer (or designate). The inspection will document any

potential lapses of integrity that may have allowed potential migration of wastes outside the containment area. If potential lapses in integrity are noted by the Engineer and determined to have the potential for wastes to migrate to underlying soils, soil samples will be collected in question in accordance with Section 8.6.

8.4 CONTAINER STORAGE IN WAREHOUSE

The container storage area is used for the storage of drums of used immersion cleaner, dry cleaning waste, aqueous cleaning solvents, and dumpster sediment. At closure, the contents of the container storage area will be removed and transported to an appropriate permitted hazardous waste management facility after proper packaging, labeling and manifesting.

The concrete floor, containment trenches and grating will be high pressure cleaned with a detergent-water solution and triple rinsed with tap water. The final rinsate will be sampled and analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If the total volatile organic compound level is less than 1 mg/L, the container storage area will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination results will be evaluated by the certifying Professional Engineer with appropriate recommendations. The rinsate wastes from the container storage area closure process will be reclaimed or properly treated at a permitted facility.

Following decontamination of the container storage area, the floor, curbing, and containment trenches will be inspected by an independent registered Professional Engineer (or designate). The inspection will document any potential lapses of integrity that may have allowed potential migration of wastes outside the storage area or containment trenches. If potential lapses in integrity are noted by the Engineer and determined to have the potential for wastes to migrate to underlying soils, soil sample(s) will be collected from immediately beneath the area(s) in question in accordance with Section 8.6.

8.5 PAINT WASTE METAL SHELTER

The paint waste shelter is used to store containers of paint waste and mineral spirits in containers prior to shipment to a reclaimer. At closure the contents of the container storage area will

be removed and transported to an appropriate permitted hazardous waste management facility after proper packaging, labeling and manifesting.

The interior portion of the shelter will be high pressure cleaned with a detergent-water solution and triple rinsed with tap water. The rinsate wastes from the paint waste shelter closure process will be reclaimed or properly treated at a permitted facility. The structure of the Paint Waste shelter will remain onsite for reuse, or scrapped following decontamination. If the shelter is to be reused, a sample will be collected of the final rinsate. The rinsate sample(s) will be analyzed for volatile organic compounds. If the total volatile compound concentration is less than 1 mg/L, the components will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be evaluated by the certifying Professional Engineer with appropriate recommendations. If the shelter, and/or components will be scrapped during closure, rinsate samples will not be collected.

Following decontamination of the paint shelter area, the floor, curbing, and containment trenches will be inspected by an independent registered Professional Engineer (or designate). The inspection will document any potential lapses of integrity that may have allowed potential migration of wastes outside the shelter containment area. If potential lapses in integrity are noted by the Engineer and determined to have the potential for wastes to migrate to underlying soils, soil sample(s) will be collected from immediately beneath the area(s) in question in accordance with Section 8.6.

8.6 Soil Sampling

If the results of the inspections for the HWMU's indicate lapses of integrity exist in the secondary containment system(s) that may have allowed the potential for waste to migrate to underlying soils, soil samples will be collected. If lapses of integrity are found that may have allowed wastes to migrate to underlying soils, soil samples will be collected as recommended by the certifying Professional Engineer along the length of an identified crack or gap.

If the tank secondary containment area is removed, soil samples will be collected from areas that exhibit waste-related staining, if present. Soil samples selected for analysis will be submitted to an Idaho-certified laboratory for analysis using appropriate EPA analytical protocol,

and analyzed for compounds representative of the wastes that were permitted for storage in the unit (VOCs, SVOCs and metals. Analytical results from soil sampling will be forwarded to DEQ.

If constituents are detected, the concentrations may be compared to appropriate risk-based clean-up levels to determine whether clean closure has been achieved and the HWMU's meet the closure performance standard. If constituents are detected at concentrations above appropriate risk-based cleanup levels, Safety-Kleen will prepare a closure plan amendment(s) that describes procedures for additional assessment and/or remediation that may be necessary to achieve clean closure.

8.7 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

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

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

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes. When closure is completed, Safety-Kleen shall submit to the Idaho Division of Environmental Quality certification, both by the operator and by an independent registered professional engineer, that the facility has been closed in accordance with the approved closure plan and IDAPA 58.01.05.008 [40 CFR 264.115]

9.0 SUBPART CC COMPLIANCE PLAN

The Safety-Kleen Boise Idaho facility shall control air pollutant emissions from waste management units at this facility pursuant to the requirements of RCRA Subpart CC, through implementation of this compliance plan.

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

Waste Determination Procedures

For purposes of waste determination, this facility utilizes knowledge developed in the Waste Characteristics portion of the Operation Plan/Permit. For those hazardous wastes which are managed on a transfer basis, and which are not described in the Operation Plan/Permit, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers, or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

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

Point of Waste Origination

The point of waste origination for all wastes generated offsite and transported to the site in closed containers, which are subsequently managed in tanks or containers at this facility, is effectively the site boundary at the entrance gate.

For those hazardous wastes generated onsite, the point of waste origination is the point of waste generation, as previously defined by RCRA. Typically, the majority of wastes generated on site occurs at the return and fill station.

Tanks

Tanks which manage organic wastes at this facility are described in detail in the Operation Plan/Permit. Certain features of these units, as they relate to Subpart CC standards, are described below.

The waste mineral spirit AST is a fixed roof, non-pressurized, quiescent tank. The waste tank at the facility is a level 1 tank under Subpart CC. The tank design capacity is less than 20,000 gallons, and the waste in this tank exhibits a vapor pressure of less than 76.6 kPa (11.1 psi). The actual vapor pressure of the waste 150 premium solvent managed in tanks is .08 kPa, see Appendix E-12. The maximum organic vapor pressure is determined using knowledge of the waste pursuant to 265.1084 (c)(4). Vapor pressure was determined using the Isoteniscope method. Only the SK 150 (Premium) solvent is managed in the waste storage tank.

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

These tanks are vented to the atmosphere through a safety device (conservation vent) which has been designed to operate with no detectable organic emissions when the device is in the closed position. In addition, these tanks are designed with a long-bolted manway pressure relief device, which remains in the closed position when not in use to relieve pressure.

Containers

Containers which manage organic wastes at this facility are described in detail in the Operation Plan/Permit. Certain features of these units, as they relate to the Subpart CC regulations, are described below.

Containers managing hazardous wastes at this facility generally fall into three categories. (1) Those hazardous waste containers that are less than 26 gallons in capacity are wholly exempt from consideration under Subpart CC. In addition, containers of wastes that are transferred through the facility are still "in the course of transportation," and therefore are exempt from Subpart CC. (2) Containers with capacities between 26 and 122 gallons are all level 1 containers, and generally meet the Level 1 standards as covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container. In addition, all Safety-Kleen containers used to manage waste meet applicable USDOT regulations on packaging hazardous materials for transportation. (3) Containers of greater than 122 gallons that manage hazardous wastes at this facility are not in light material service and are Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container. In addition, all Safety-Kleen containers used to manage wastes use applicable USDOT regulations on packaging hazardous materials for transportation.

Inspection and Monitoring

Hazardous wastes accepted from off-site generators are already containerized when the facility accepts the waste. Such containers are visually inspected either at the time they are unloaded for storage or staged for transfer at the facility, or during the daily facility inspection. The inspection occurs within 24 hours of the wastes arrival at the facility. This written plan and schedule to perform the inspections is incorporated in the facility inspection plan by this reference.

An initial visual tank inspection was conducted on December 6, 1996. No defects were noted on the waste storage tank that could result in air pollutant emissions.

Visual tank inspections shall be conducted on an annual basis.

Recordkeeping

Documentation of tank and tank cover design: See operations Plan/Permit

Documentation of waste determinations: See Waste characteristics portion of Operations Plan/Permit

Records of all visual inspections: See daily facility inspection records, and enclosed record of initial tank inspection

Listing of all tanks, by unique identifying number which are difficult or unsafe to inspect: See enclosed.

Results of determination of the maximum vapor pressure of waste in tanks and record of the tank dimensions and design capacity: See operations Plan/Permit

APPENDIX A

Exhibits

A-1	Part A Application
A-2	Topographical Map
	Aerial Photo
	Facility Drawing
A-3	Facility Construction - Air Permit
A-4	Facility Photographs

EXHIBIT A-1

PART A APPLICATION

Form Approved. OMB No. 2050-0034 Expires 9-30-99
GSA No. 0246-EPA-OT

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

For EPA Regional Use Only		
Date Received Month Day Year		

EPA

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. First Part A Submission [X] B. Part A Amendment # 7/2/1998

C. EPA ID Number	D. Secondary ID Number *(if applicable)*
IDD981770498	

II. Name of Facility

SAFETY-KLEEN SYSTEMS, INC.

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street

6334 SUPPLY WAY

Street *(continued)*

City or Town	State	Zip Code
BOISE	ID	83716 -

County Code *(if known)*	County Name
	ADA

B. Land Type (Enter Code)	C. Geographic Location LATITUDE (degrees, minutes & seconds)				LONGITUDE (degrees, minutes & seconds)				D. Facility Existence Date Month	Day	Year
P	43	32	38N		116	10	54W		10	30	1991

IV. Facility Mailing Address

Street or P.O. Box

6334 SUPPLY WAY

City or Town	State	Zip Code
BOISE	CO	83716 -

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(last)*	*(first)*
LESTER	MARK
Job Title	**Phone Number** *(area code and number)*
BRANCH MANAGER	208 - 342 - 8882

VI. Facility Contact Address *(See instructions)*

A. Contact Address Location	Mailing	Other	B. Street or P.O. Box
	X		6334 SUPPLY WAY

City or Town	State	Zip Code
BOISE	ID	83716 -

EPA Form 8700-23 (Rev. 10/99)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 9-30-96
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
DD981770498	

VII. Operator Information (see instructions)

Name of Operator			
SAFETY-KLEEN SYSTEMS, INC.			
Street or P.O. Box			
6334 SUPPLY WAY			
City or Town	**State**	**Zip Code**	
BOISE	ID	83716 -	

Phone Number (area code and number)	B. Operator Type	C. Change of Operator Indicator	Date Changed Month/Day/Year
208 - 342 - 8882	P	Yes [ ] No [X]	

VIII. Facility Owner (see instructions)

Name of Facility's Legal Owner			
SAFETY-KLEEN SYSTEMS, INC			
Street or P.O. Box			
1301 GERVAIS STREET, SUITE 300			
City or Town	**State**	**Zip Code**	
COLUMBIA	SC	29201 -	

e Number (area code and number)	B. Owner Type	C. Change of Owner Indicator	Date Changed Month/Day/Year
803 - 933 - 4200	P	Yes [ ] No [X]	

IX. NAICS Codes (in order of significance; start in left box)

First	5	3	2	4	9		**Third**	4	8	4	2	2	
(description) Other commercial and Industrial machinery and equipment rental and leasing							(description) Specialized frieght (except used goods) Trucking, local						
Second	4	8	4	2	3		**Fourth**						
(description) Specialized freight (except used goods) Trucking, Long distance							(description)						

X. Other Environmental Permits (see instructions)

A. Permit Type (Enter code)	B. Permit Number	C. Description
P	00001-0098	Permit to construct an air pollution emitting source

m 8700-23 (Rev. 10/99)

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
IDD981770498	

her Environmental Permits *(continued)*

A. Permit Type *(enter code)*	B. Permit Number	C. Description

EPA I.D. Number *(enter from page 1)*: IDD981770498

Secondary ID Number *(enter from page 1)*:

XI. Nature of Busin *(provide a brief description)*

This location is primarily a local sales/service office for distributing and collection spent solvents and antifreeze (which are reclaimed by Safety-Kleen products consisting of small parts cleaning equipment, solvent and allied products such as hand cleaner, parts washing brushes, etc). Safety-Kleen collects spent solvents from its customers on a periodic basis and accumulates it, either in a storage tank or in a container storage area. The majority of Safety-Kleen's customers are conditionally exempt small quantity generators. Once a sufficient quantity of materials is collected, the materials are moved off-site in a semi trailer to a Safety-Kleen recycling center.

XII. Process - Codes and Design Capacities

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

B. PROCESS DESIGN CAPACITY - *For each code entered in Column A, enter the capacity of the process.*

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

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal	
D79	Injection Well	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet of Hectare-meter
D81	Land Application	Acres of Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment	Gallons or Liters
D99	Other Disposal	Any unit of measure listed below
	Storage	
S01	Container (barrel, drum, etc.)	Gallons or Liters
S02	Tank	Gallons or Liters
S03	Waste Pile	Gallons or Liters
S04	Surface Impoundment	Gallons or Liters
S05		
S06	Containment Building-Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment	
T01	Tank	Gallons Per Day or Liters Per Day
T02	Surface Impoundment	Gallons Per Day or Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or BTU's Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T80	Boiler	Gallons or Liters
T81	Cement Kiln	Gallons Per Day; Liters Per Day Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T88	Titanium Dioxide Chloride Process Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used in the Recovery of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
T94	Containment Building-Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Incineration	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
X04	Geologic Repository	Cubic Yards or Cubic Meters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liter Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu's Per Hour	K

I.D. Number (enter from page 1) IDD981770498

Secondary ID Number (enter from page 1)

XII. Process - Codes and Design Capacities (continued)

EXAMPLES FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	2. Unit Of Measure (Enter Code)	C. Process Total Number Of Units	For Official Use Only
X	1	S	0	2	533 . 788	G	001	
	1	S	0	1	8,784 .	G	002	
	2	S	0	2	10,000 .	G	001	
	3							
	4							
	5							
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

NOTE: If you need to list more than 1 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in seq w/XII)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	2. Unit of Measure (Enter Code)	C. Process Total Number Of Units	D. Description of Process
X	1	T	0	4				In-situ Vitrification
	1							
	2							
	3							
	4							

EPA I.D. Number *(enter from page 1)*: IDD981770498

Secondary ID Number *(enter from page 1)*:

Process - Codes and Design Capacities *(continued)*

EPA I.D. Number (enter from page 1) | Secondary ID Number (enter from page 1)

IDD981770498

XIV. Description of Hazardous Wastes

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

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

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

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

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

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

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

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

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of item XIV-D(1).
3. Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

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

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

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

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS (1) PROCESS CODES (Enter Code)	D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included with above

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 9-30-96
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1)

IDD981770498

Secondary ID Number (enter from page 1)

Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1)
1	D001	400	T	S 0 1 S 0 2	
2	D004				Included with above
3	D005				Included with above
4	D006				Included with above
5	D007				Included with above
6	D008				Included with above
7	D009				Included with above
8	D010				Included with above
9	D011				Included with above
10	D018				Included with above
11	D019				Included with above
12	D021				Included with above
13	D022				Included with above
14	D023				Included with above
15	D024				Included with above
16	D025				Included with above
17	D026				Included with above
18	D027				Included with above
19	D028				Included with above
20	D029				Included with above
21	D030				Included with above
22	D032				Included with above
23	D033				Included with above
24	D034				Included with above
25	D035				Included with above
26	D036				Included with above
27	D037				Included with above
28	D038				Included with above
29	D039				Included with above
30	D040				Included with above
31	D041				Included with above
32	D042				Included with above
33	D043				Included with above

EPA Form 8700-23 (Rev. 10/99)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 9-30-96
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1): IDD981770498

Secondary ID Number (enter from page 1):

Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
34	F002	42	T	S01	
35	F002	0	T	S01	
36	F004			S11	Included with above
37	F005	10		S21	
38	F003			S31	Included with above
39					
40					
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66					

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
IDD981770498	

XV. Map

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

NO CHANGE - SUBMITTED PREVIOUSLY

XVI. Facility Drawing

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

XVII. Photographs

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

NO CHANGE - SUBMITTED PREVIOUSLY

XVIII. Certification(s)

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

Owner Signature	Date Signed
Name and Official Title *(type or print)* Sean McMahon, Regional Sales Manager	
Owner Signature	Date Signed
Name and Official Title *(type or print)*	
Operator Signature	Date Signed
Name and Official Title *(type or print)* Sean McMahon, Regional Sales Manager	
Operator Signature	Date Signed
Name and Official Title *(type or print)*	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
IDD981770498	

XV. Map

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

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XVIII. Certification(s)

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

Owner Signature: Mark Lesters	Date Signed: 11-20-01
Name and Official Title *(type or print)*: Mark Lester Branch Manager	
Owner Signature:	Date Signed:
Name and Official Title *(type or print)*:	
Operator Signature: Mark Lesters	Date Signed: 11-20-01
Name and Official Title *(type or print)*: Mark Lester Branch Manager	
Operator Signature:	Date Signed:
Name and Official Title *(type or print)*:	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

OMB# 2050-0024; Expires 12/31/2014

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**	

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

Reason for Submittal:

- ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number
- ☒ To provide a Subsequent Notification (to update site identification information for this location)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #)
- ☐ As a component of the Hazardous Waste Report (If marked, see sub-bullet below)
  - ☐ Site was a TSD facility and/or generator of ≥1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)

2. Site EPA ID Number

EPA ID Number: I D D 9 8 1 7 7 0 4 9 8

3. Site Name

Name: Safety-Kleen Systems, Inc.

4. Site Location Information

Street Address:6334 Supply Way		
City, Town, or Village:Boise		County:ADA
State:Idaho	Country:USA	Zip Code:83716

5. Site Land Type

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

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

A. 5 6 2 1 1 2		C. 4 8 4 2 2 0	
B. 4 8 4 2 3 0		D. 5 3 2 4 9 0	

7. Site Mailing Address

Street or P.O. Box:Same as Item 4		
City, Town, or Village:		
State:	Country:	Zip Code:

8. Site Contact Person

First Name:Nicholas	MI:T	Last:Cullan Jr.	
Title:EHS Manager			
Street or P.O. Box:1486 Golden Spur Drive			
City, Town, or Village:Placerville			
State:CA	Country:USA	Zip Code:95667	
Email:nick.cullan@safety-kleen.com			
Phone:530-642-2653	Ext.:	Fax:530-295-1524	

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner:Safety-Kleen Systems, Inc.							Date Became Owner: 10/31/1990	
Owner Type: ☒ Private	☐ County	☐ District	☐ Federal	☐ Tribal	☐ Municipal	☐ State	☐ Other	
Street or P.O. Box:2600 North Central Expressway Suite 400								
City, Town, or Village:Richardson							Phone:972-265-2000	
State:TX	Country:USA						Zip Code:75080	
B. Name of Site's Operator:Safety-Kleen Systems, Inc.							Date Became Operator:10/31/1990	
Operator Type: ☒ Private	☐ County	☐ District	☐ Federal	☐ Tribal	☐ Municipal	☐ State	☐ Other	

EPA ID Number | I | D | D | 9 | 8 | 1 | 7 | 7 | 0 | 4 | 9 | 8 | OMB#: 2050-0024; Expires 12/31/2014

10. Type of Regulated Waste Activity (at your site)
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.

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

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

If "Yes" above, indicate other generator activities in 2-4.

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

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

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

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

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

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

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

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

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

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

Y ☒ N ☐ **10. Receives Hazardous Waste from Offsite**

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

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

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

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

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

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

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

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

- ☐ a. Processor
- ☐ b. Re-refiner

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

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

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

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

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

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

- ☐ a. College or University
- ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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

11. Description of Hazardous Waste

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

D001	DOO4	D005	D006	D007	D008	D009
D010	D011	D018	D019	D021	D022	D023
D024	D025	D026	D027	D028	D029	D030
D032	D033	D034	D035	D036	D037	D038
D039	D040	D041	D042	D043	F002	F003
F004	F005					

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

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

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

13. Comments

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

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Virgil W. Duffie, SVP and Assistant Secretary	08/23/2012

EPA ID Number | I | D | D | 9 | 8 | 1 | 7 | 7 | 0 | 4 | 9 | 8 |

OMB#: 2050-0024; Expires 12/31/2014

United States Environmental Protection Agency

HARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact	**First Name:** Nicholas	**MI:** T	**Last Name:** Culian Jr.	
	Contact Title: EHS Manager			
	Phone: 530-642-2653	**Ext.:**	**Email:** nick.culian@safety-kleen.com	
2. Facility Permit Contact Mailing Address	**Street or P.O. Box:** 1486 Golden Spur Drive			
	City, Town, or Village: Placerville			
	State: CA			
	Country: USA	**Zip Code:** 95667		
3. Operator Mailing Address and Telephone Number	**Street or P.O. Box:** 2600 North Central Expressway, Suite 400			
	City, Town, or Village: Richardson			
	State: Texas	**Phone:** 972-265-2000		
	Country: USA	**Zip Code:** 75080		
4. Facility Existence Date	**Facility Existence Date (mm/dd/yyyy):** 10/31/1990			

5. Other Environmental Permits

A. Facility Type *(Enter code)*	B. Permit Number	C. Description
P	0 0 0 1 0 0 9 8	Permit to Construct an air pollution emitting source

6. Nature of Business: The facility includes a sales office, distribution/warehouse, and tanks for storage of spent solvent, and an area to bulk solvents into trucks. Products include small parts cleaning equipment, solvents, antifreeze, hand cleaner, floor soap, and other allied products. Safety-Kleen collects spent material from customers and accumulates the spent solvents in a storage tank or in a container storage area. Bulk transfer is also performed.

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

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

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

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

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

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

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

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

7. Process Codes and Design Capacities (Continued)

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

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. PROCESS DESIGN CAPACITY (2) Unit of Measure	C. Process Total Number of Units	For Official Use Only					
X	1	S	0	2	533.788	G	001						
	1	S	0	2	12000.0	G	001						
	2	S	0	1	8784.0	G	002						
	3												
	4												
	5												
	6												
	7												
	8												
	9												
1	0												
1	1												
1	2												
1	3												

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

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

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

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

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

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

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

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

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

D. PROCESSES

1. PROCESS CODES:

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

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

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

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

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

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

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

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

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

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

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
	1	D	0	0	1	400	T	S	0	1	S	0	2				
	2	D	0	0	4												Included with above
	3	D	0	0	5												Included with above
	4	D	0	0	6												Included with above
	5	D	0	0	7												Included with above
	6	D	0	0	8												Included with above
	7	D	0	0	9												Included with above
	8	D	0	1	0												Included with above
	9	D	0	1	1												Included with above
1	0	D	0	1	8												Included with above
1	1	D	0	1	9												Included with above
1	2	D	0	2	1												Included with above
1	3	D	0	2	2												Included with above
1	4	D	0	2	3												Included with above
1	5	D	0	2	4												Included with above
1	6	D	0	2	5												Included with above
1	7	D	0	2	6												Included with above
1	8	D	0	2	7												Included with above
1	9	D	0	2	8												Included with above
2	0	D	0	2	9												Included with above
2	1	D	0	3	0												Included with above
2	2	D	0	3	2												Included with above
2	3	D	0	3	3												Included with above
2	4	D	0	3	4												Included with above
2	5	D	0	3	5												Included with above
2	6	D	0	3	6												Included with above
2	7	D	0	3	7												Included with above
2	8	D	0	3	8												Included with above
2	9	D	0	3	9												Included with above
3	0	D	0	4	0												Included with above
3	1	D	0	4	1												Included with above
3	2	D	0	4	2												Included with above
3	3	D	0	4	3												Included with abovef00
3	4	F	0	0	2	42	T	S	0	1							
3	5	F	0	0	2	0	T	S	0	1							
3	6	F	0	0	4			S	0	1							Included with above

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

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	D. PROCESSES (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
3 7	F 0 0 5	10	T	S 0 1	
3 8	F 0 0 3			S 0 1	Included with above

10. Map

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

11. Facility Drawing

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

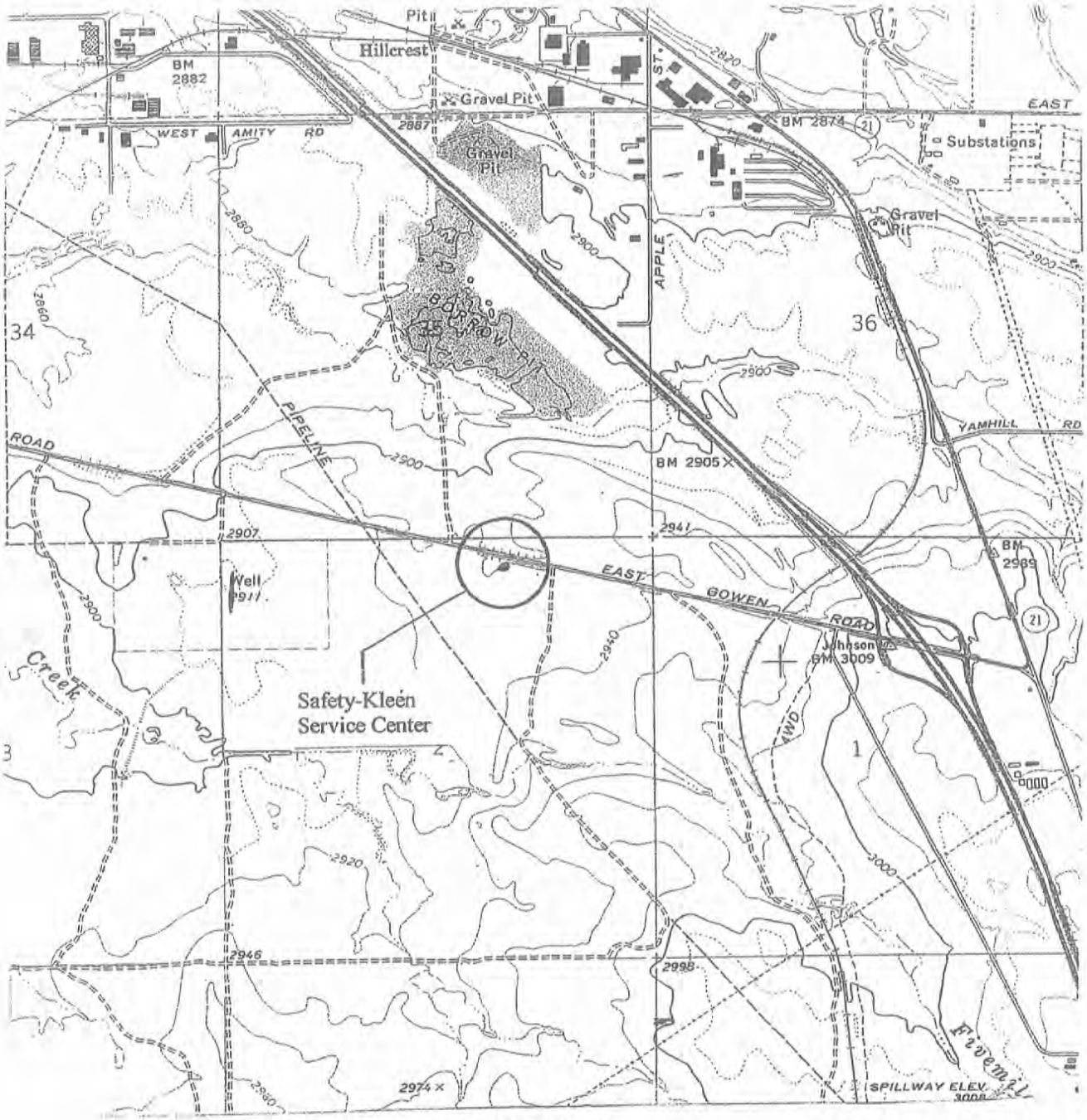
12. Photographs

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

13. Comments

EXHIBIT A-2

TOPOGRAPHICAL MAP /
AERIAL PHOTO /
FACILITY DRAWING (Traffic Flow Pattern)



ROAD CLASSIFICATION

Primary highway, hard surface

Secondary highway, hard surface

Light-duty road, hard or improved surface

Unimproved road

Interstate Route U. S. Route State Route

IDAHO

QUADRANGLE LOCATION

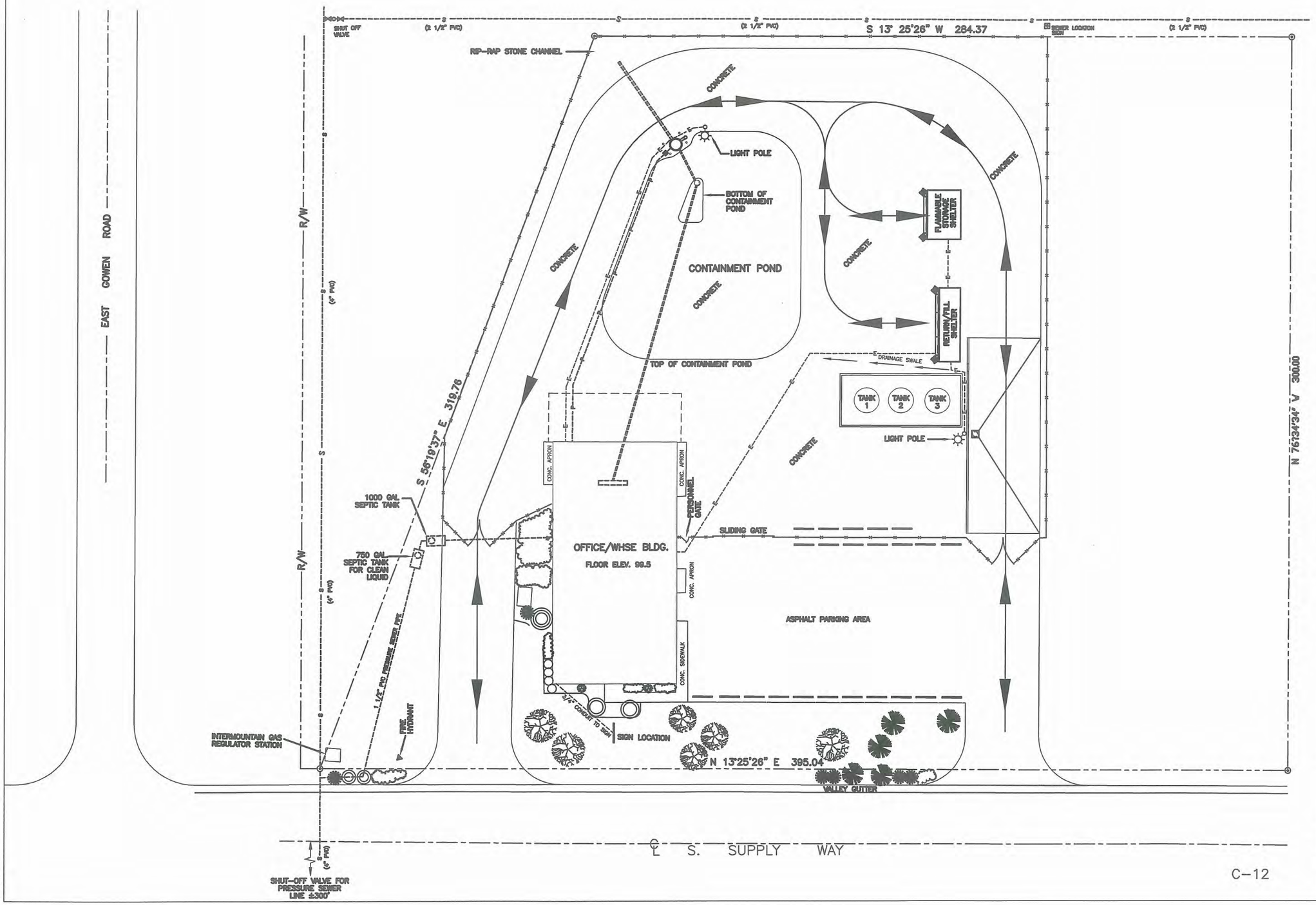
BOISE SOUTH, IDAHO

43116-E2-TF-024

PHOTOINSPECTED 1976

1972

DMA 2771 II SW-SERIES V893



C-12

120601

N

0' 15' 50'
5' 30' 75'

GENERAL NOTES

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	12,000 USG	USED MINERAL SPIRITS	10'-6" F&D BOTTOM TANK
2	12,000 USG	CLEAN 105° MINERAL SPIRITS	10'-6" F&D BOTTOM TANK
3	12,000 USG	CLEAN 150° MINERAL SPIRITS	10'-6" F&D BOTTOM TANK

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	RELEASED TO WEY FOR REVIEW	MBH	KJM	WEY	053196
B	ADDED LANDSCAPING	MBH	KJM	WEY	053196
C	REVISED FOR PERMIT	JEK	NC	NC	012813

PROPRIETARY STATEMENT

THIS DRAWING IS THE EXCLUSIVE PROPERTY OF SAFETY-KLEEN SYSTEMS, INC. AND IS PROPRIETARY AND CONFIDENTIAL INFORMATION. THIS DRAWING AND THE INFORMATION CONTAINED THEREIN MUST NOT BE DUPLICATED, USED, DIVULGED, REPRODUCED, COPIED, DISCLOSED OR APPROPRIATED IN WHOLE OR IN PART FOR ANY PURPOSE OTHER THAT AS EXPRESSLY AUTHORIZED BY SAFETY-KLEEN SYSTEMS, INC. THIS DRAWING MUST BE RETURNED PROMPTLY UPON REQUEST.

Project Solutions Companies
2005 West Broadway • Suite 210 • Columbia • MO 65203
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

TITLE

TRAFFIC FLOW PATTERNS

SAFETY-KLEEN SYSTEMS, INC.
2600 N. CENT. EXPRESSWAY STE. 400 RICHARDSON, TX. 75080
PHONE 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1"=20'-0"	JGM				05-31-89
SERVICE CENTER LOCATION			SC-DWG NUMBER		REV. NO.
BOISE, ID			7114-SP00-004		C

To see all the details that are visible on the screen, use the "Print" link next to the map.

Google

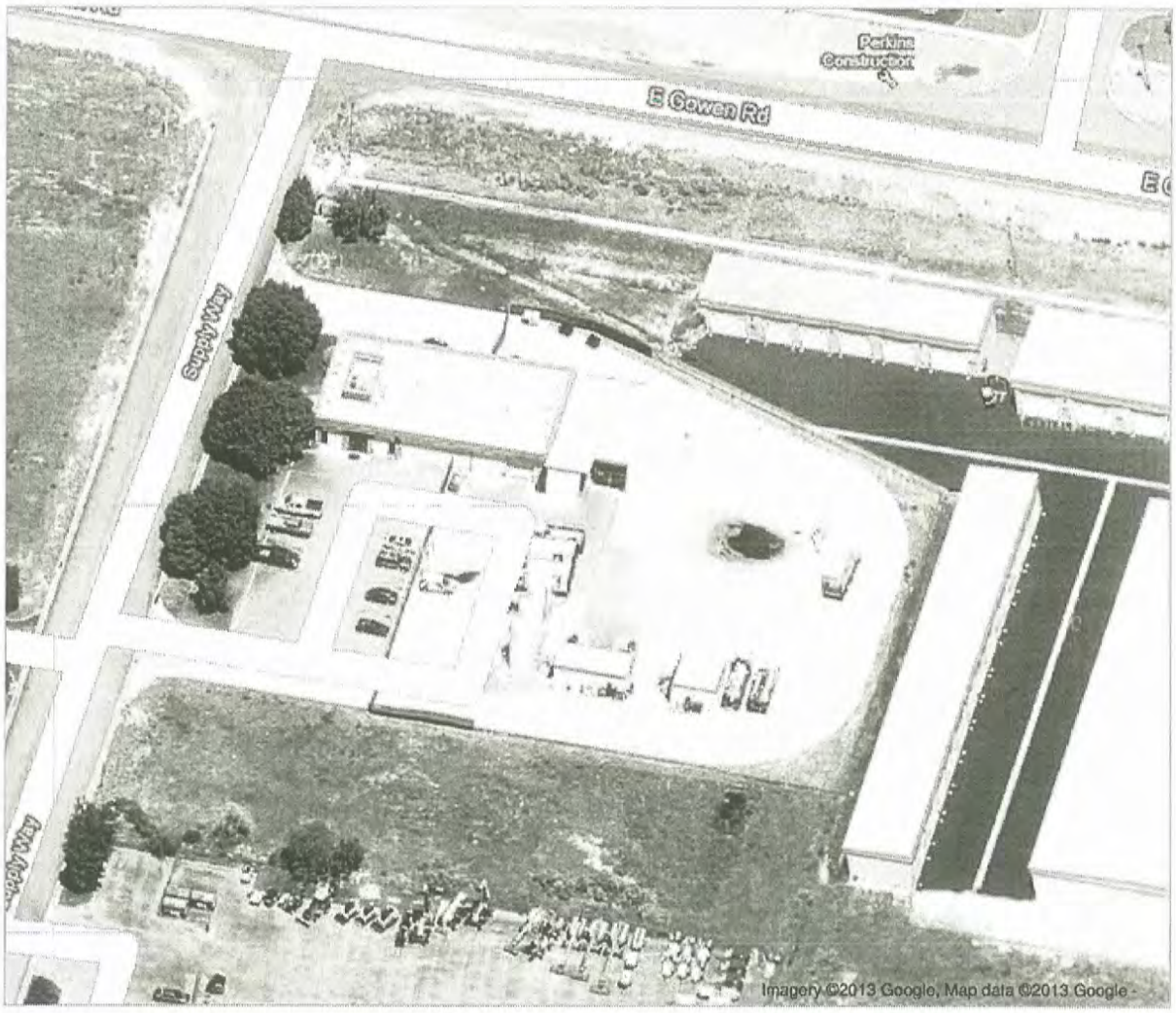


EXHIBIT A-3

FACILITY CONSTRUCTION - AIR PERMIT

STATE OF IDAHO PERMIT TO CONSTRUCT AN AIR POLLUTION EMITTING SOURCE	PERMIT NUMBER 0001 – 0098 AQCR: 064 CLASS: B SIC: 5172 ZONE: 11 UTM COORDINATE (km): 566.9, 4821.3

1. PERMITTEE
SAFETY-KLEEN CORPORATION

2. PROJECT
SOLVENT STORAGE AND TRANSFER FACILITY

3. ADDRESS	COUNTY	NO. OF FULL TIME EMPLOYEES
SUPPLY WAY AND GOWEN ROAD BOISE INDUSTRIAL PARK	ADA	6

4. CITY	STATE	ZIP CODE	PROPERTY AREA AT SITE (Acreage)
BOISE	IDAHO	83705	

5. PERSON TO CONTACT	TITLE	TELEPHONE NUMBER
RICHARD MATTRASS	REGIONAL ENV. ENGINEER	(206) 953-9414

6. EXACT PLANT LOCATION
BOISE WAY AND GOWEN ROAD

7. GENERAL NATURE OF BUSINESS AND KINDS OF PRODUCTS
SOLVENT STORAGE AND TRANSFER FACILITY

8. GENERAL CONDITIONS

This permit is issued according to the Rules and Regulations for the Control of Air Pollution in Idaho, Section 01.1012, and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be constructed by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located, (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment, (c) does not release the permittee from compliance with other applicable local laws, regulations, or ordinances, (d) in no manner implies or suggests that the Department of Health and Welfare, or its officers, agents, or employees, assumes any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for two years.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED WITH ITS APPLICATION. CHANGES OF DESIGN OR EQUIPMENT MUST BE APPROVED IN ADVANCE BY THE DEPARTMENT.

ASSISTANT ADMINISTRATOR
PERMITS AND ENFORCEMENT

DATE
July 13, 1992

PERMIT TO CONSTRUCT

PERMITTEE, PROJECT, AND LOCATION

Safety-Kleen Corporation
Boise, Idaho

PERMIT NUMBER

0001 - 0098

SOURCE

Solvent Storage and Transfer Facility

1. SOURCE DESCRIPTION

This facility is a solvent distribution service center which provides clean solvent and collects spent solvent. Some drums of used solvent are emptied, washed and refilled at this facility. The used drum solvent is temporarily stored on site in the 12,000 gallon spent solvent storage tank. Other containers of solvent waste are also temporarily stored at this facility, but are never opened on site. A tanker and trailer truck brings clean solvents from the refinery and then returns with spent solvents.

1.1 Warehouse and Container Storage Area

5,000 square foot warehouse which stores a maximum of 4,464 gallons of spent solvents in closed drums.

1.2 Tank Farm and Return and Fill Area

Two (2) 12,000 gallon above-ground fixed roof storage tanks. One tank stores clean solvent and the other stores spent solvent.

1.3 Solvent Return and Fill Station

A loading dock, two (2) 375 gallon receiving and washing units, two (2) multiple solvent dispensing units connected to four (4) dispensing nozzles with automatic shut-off valves.

1.4 Flammable Shelter

A maximum of 2,592 gallons of containerized paint wastes is stored in this building.

ASSISTANT ADMINISTRATOR
PERMITS AND ENFORCEMENT

DATE: July 13, 1992

PERMIT TO CONSTRUCT

PERMITTEE, PROJECT, AND LOCATION

PERMIT NUMBER

Safety-Kleen Corporation
Boise, Idaho

0001 - 0098

SOURCE

Solvent Storage and Transfer Facility

2. EMISSION LIMITS

2.1 Daily Toxic Emissions Limited

Toxic emissions shall be limited to the following as required by IDAPA 16.01.01011,01 (Rules and Regulations for the Control of Air Pollution in Idaho):

2.1.1 2.5 pounds of 1,1,1-TCE (trichloroethane) per day;

2.1.2 0.17 pounds of ethylbenzene per day;

2.1.3 0.25 pounds of xylenes per day; and

2.1.4 0.49 pounds of toluene per day.

3. OPERATING REQUIREMENTS

3.1 Drum Washing Limited

In order to comply with toxic emission limits, the total number of drums washed per day shall be limited to:

3.1.1 A maximum of 50 drums having a capacity of 30 gallons; and

3.1.2 A maximum of 80 drums having a capacity of 16 gallons.

4. REPORTING REQUIREMENTS

4.1 Maintain a Log

Safety-Kleen shall maintain a log that documents Conditions 3.1. This log shall be made available to DEQ personnel upon request.

ASSISTANT ADMINISTRATOR
PERMITS AND ENFORCEMENT

DATE: July 13, 1992

PERMIT TO CONSTRUCT GENERAL PROVISIONS

A. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the **Rules and Regulations for the Control of Air Pollution in Idaho.** The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the **Rules and Regulations for the Control of Air Pollution in Idaho,** and the Environmental Protection and Health Act, Idaho Code 39-101, et.seq.

B. The permittee shall at all times (except as provided in the **Rules and Regulations for the Control of Air Pollution in Idaho**) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:

1) To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and

2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing in conformance with the Department's **Procedures Manual for Air Pollution Control** when deemed appropriate by the Director.

D. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.

E. The permittee shall notify the Idaho Air Quality Bureau, in writing, of the required information for the following events within five working days after occurrence:

1) Initiation of Construction - Date
2) Completion/Cessation of Construction - Date
3) Actual Production Startup - Date
4) Initial Date of Achieving Maximum Production Rate - Production Rate and Date

F. If emission testing is specified, the permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one-hundred and eighty (180) days after initial startup. Such testing must **strictly** adhere to the procedures outlined in the Department's **Procedures Manual for Air Pollution Control,** and will not be conducted on weekends or state holidays. Testing procedures and specific time limitations may be modified by the Idaho Air Quality Bureau by prior negotiation if conditions warrant adjustment. The Idaho Air Quality Bureau shall be notified at least fifteen (15) working days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

The performance tests will be performed at the **maximum** production rate. If this maximum rate is not achieved during testing, the allowable production rate will be limited to the production rate attained during testing.

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

EXHIBIT A-4

FACILITY PHOTOGRAPHS

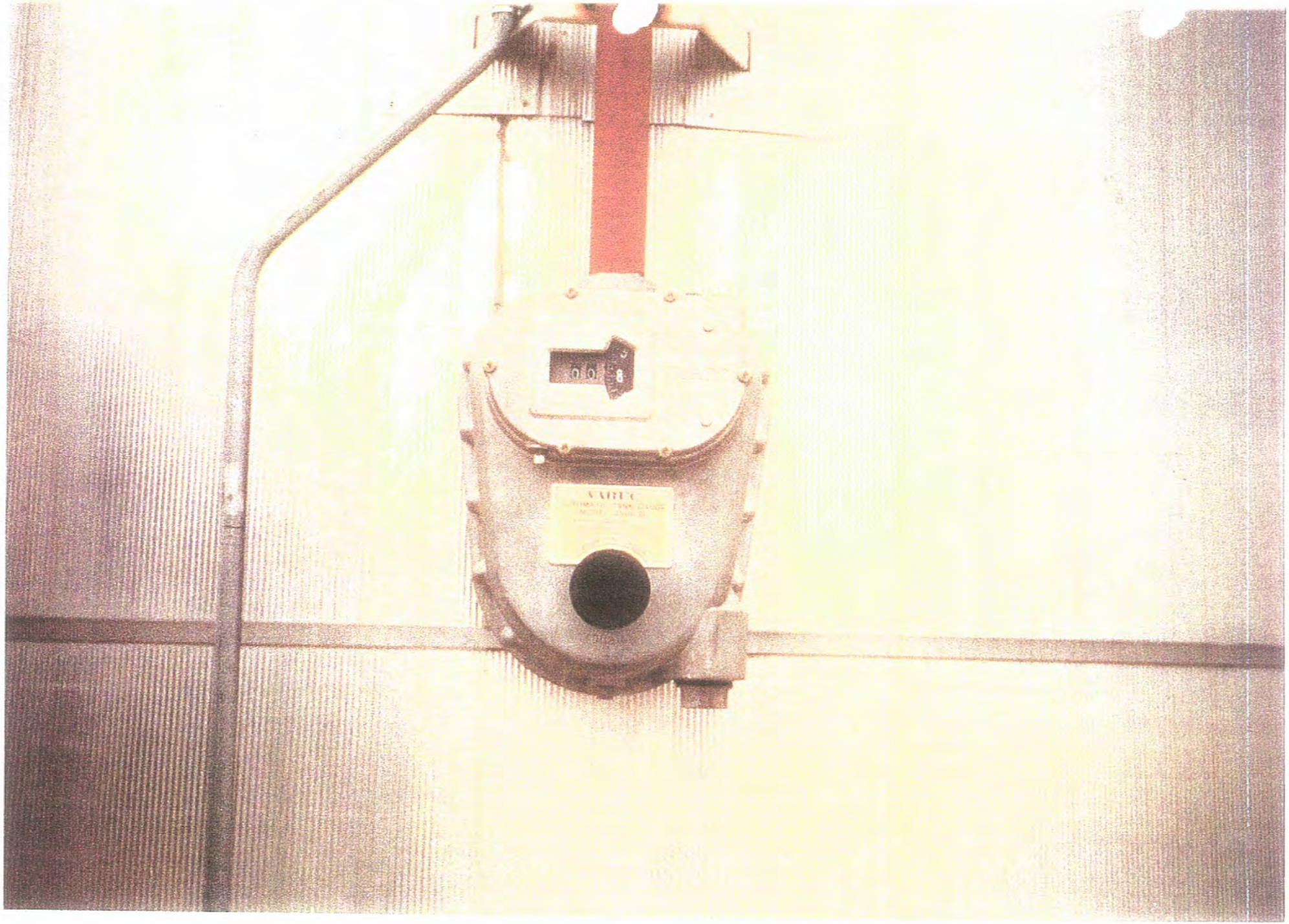
Photograph Descriptions

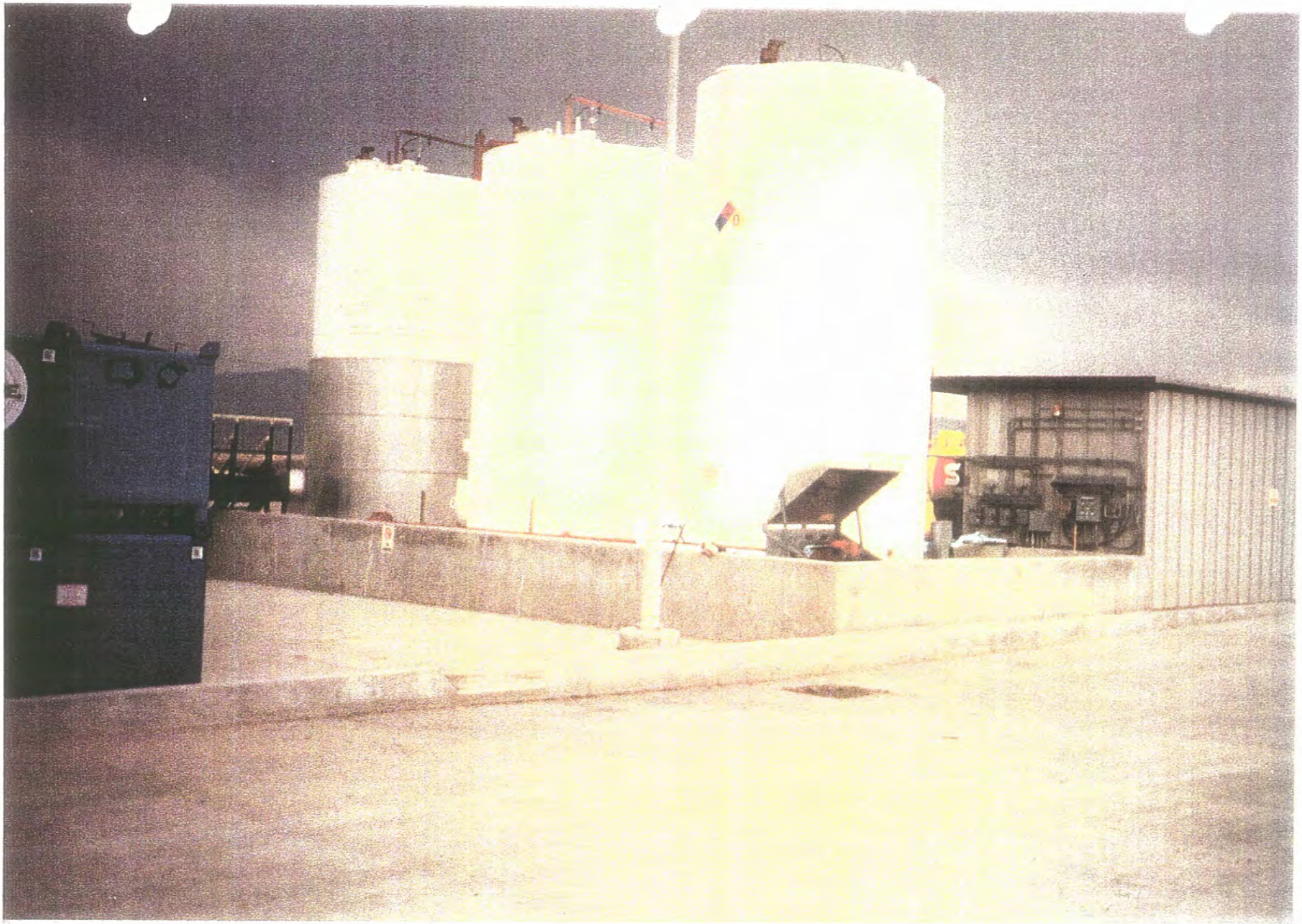
1. Boise Facility – Office/Warehouse
2. Transfer Facility area / Stormwater Collection Trench
3. Warehouse Container Storage Area
4. Warehouse Container Storage Area – Sumps
5. Tank level guage
6. Tank Farm with three 12,000 gallon storage tanks
7. Tank Farm, Return and Fill, Paint Shelter
8. Paint Shelter, Return and Fill, Tank Farm
9. Return and Fill
10. Return and Fill – Continued Use Vat (foreground) and Drum Washer/Dumpster
11. Tanker loading/unloading piping connection and containment box
12. Tank High level alarm control panel
13. Tank Secondary containment sump
14. Ancillary piping from tank to Return and Fill
15. Tanker loading/unloading concrete pad

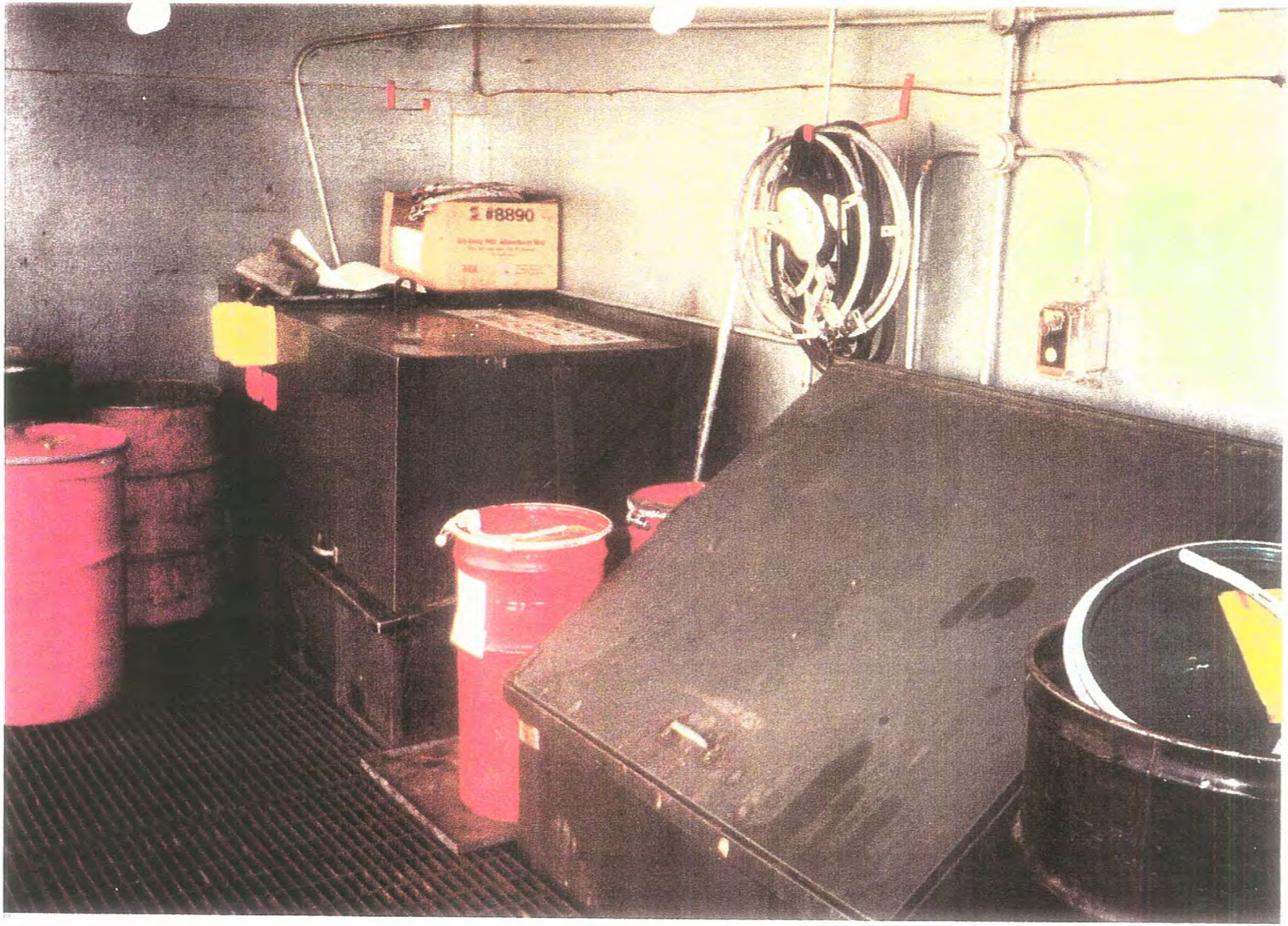
NOW

MAX. CAP. 44644AL

EXIT



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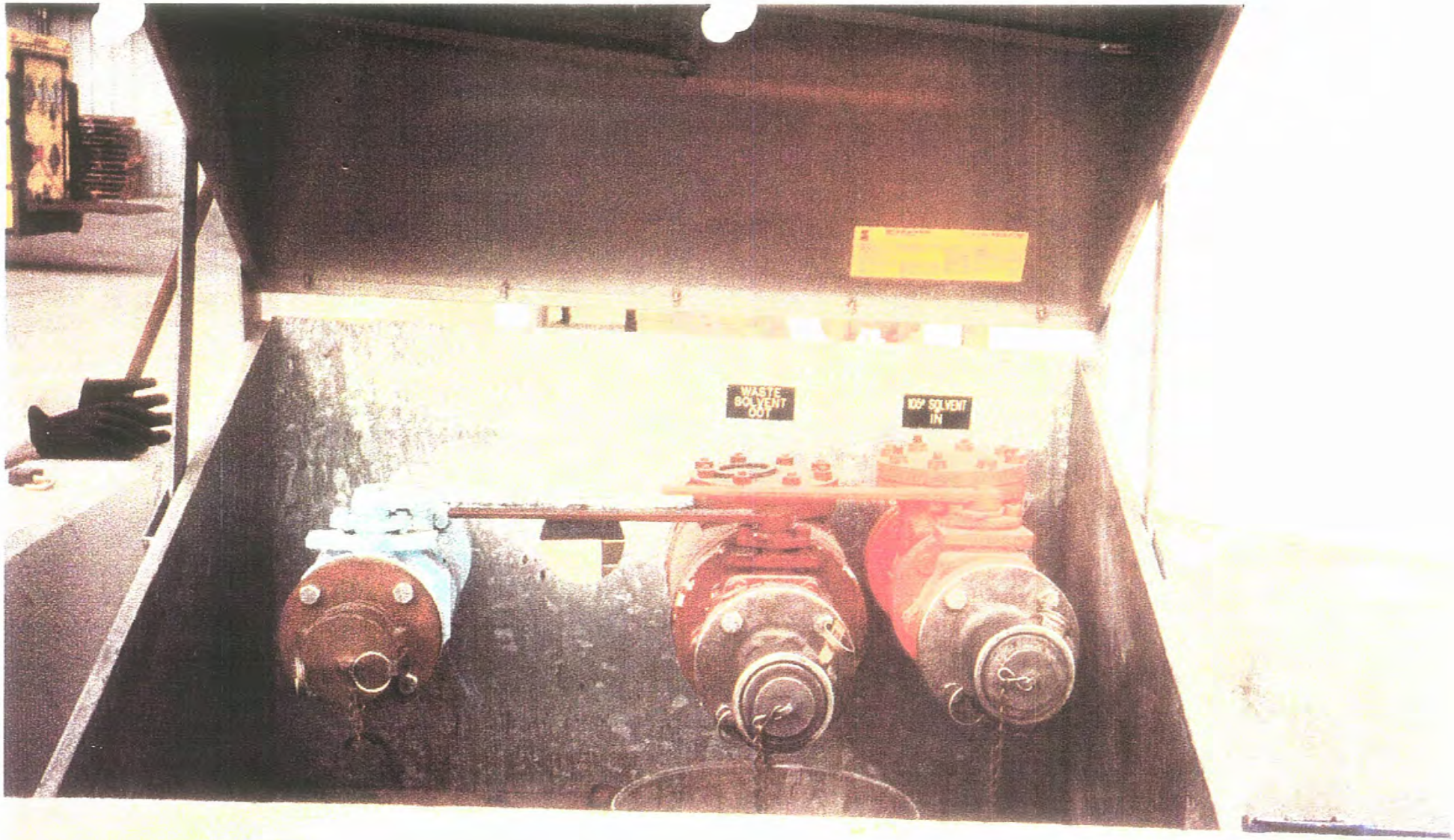
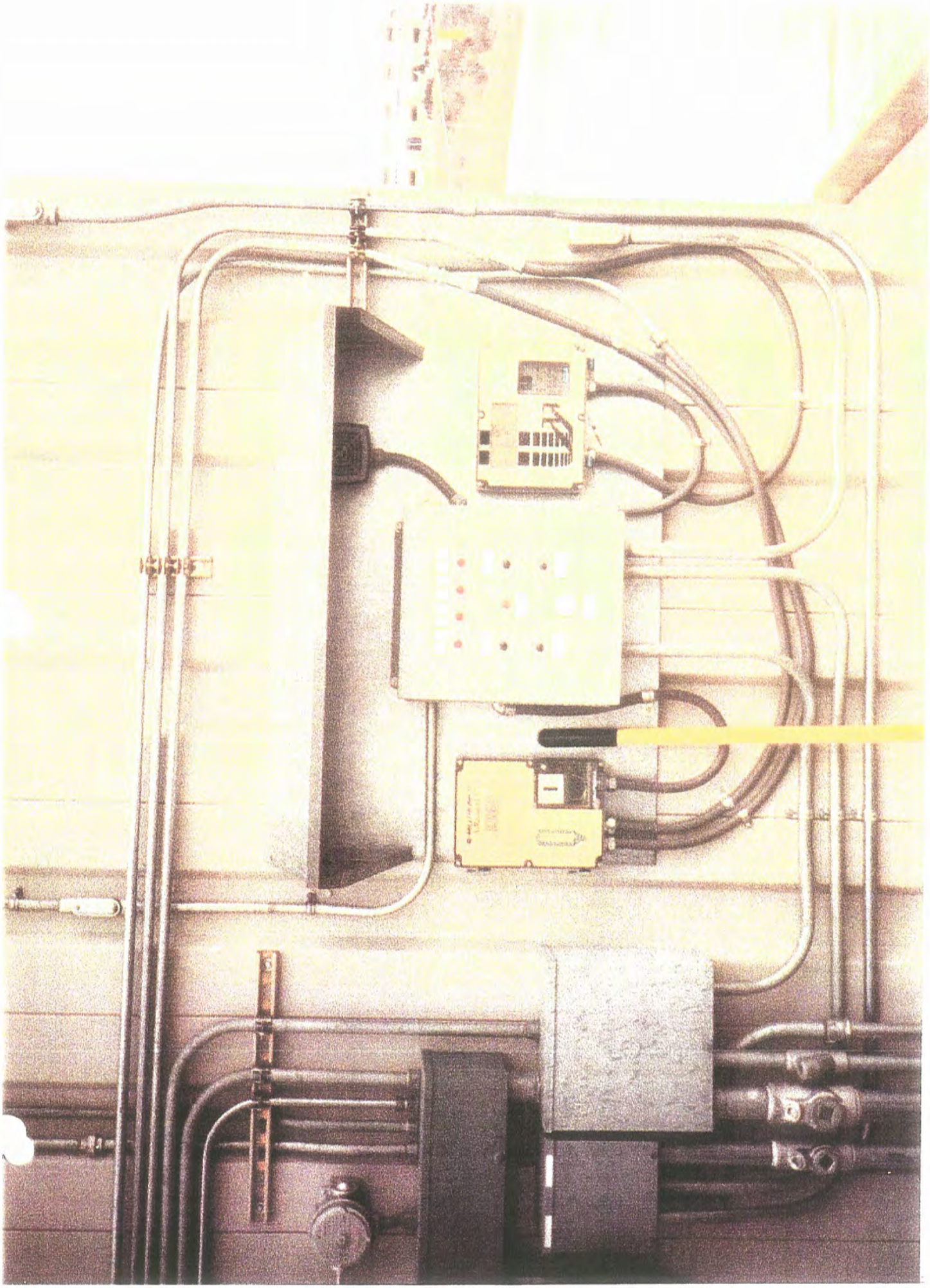
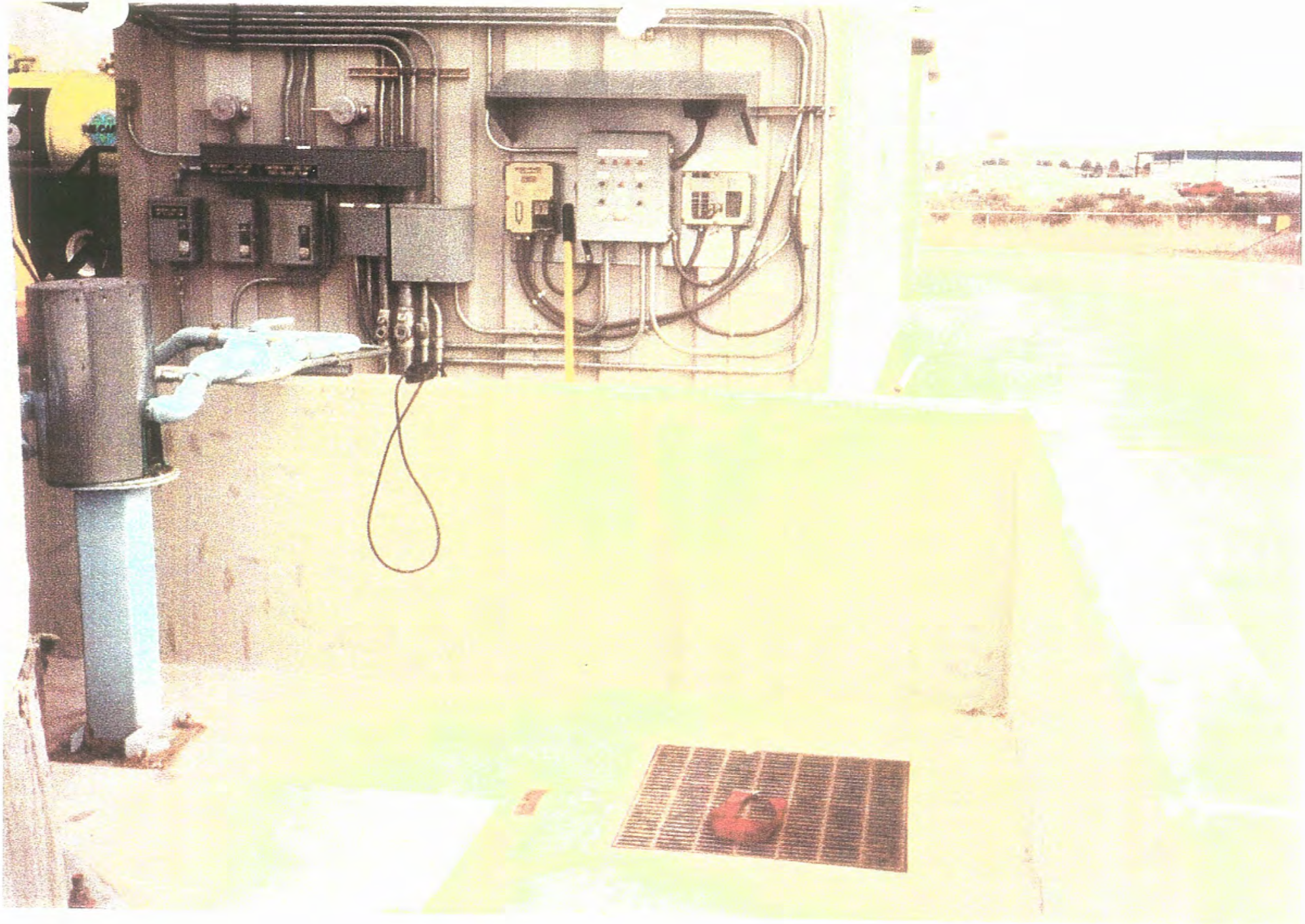
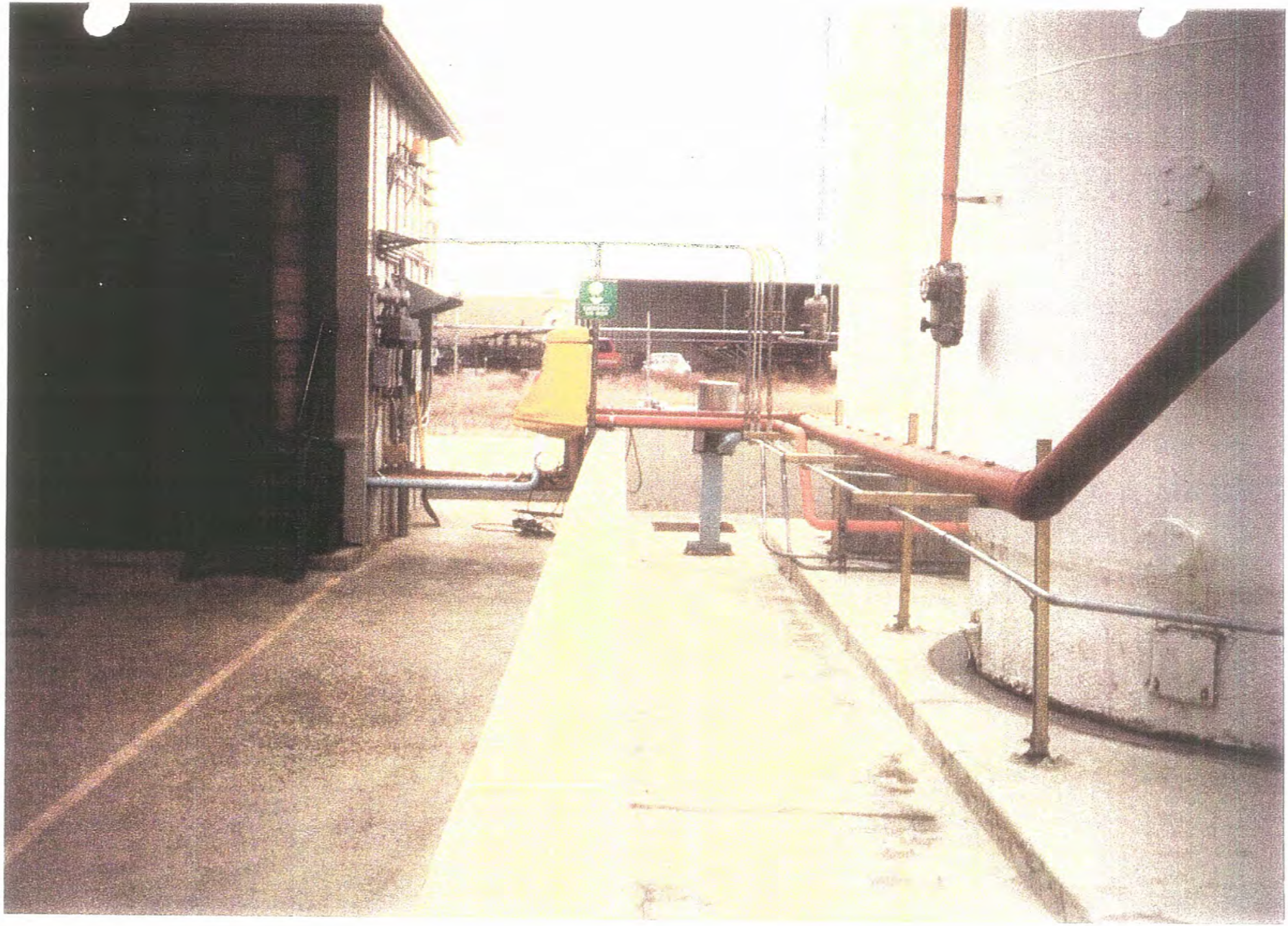

WASTE SOLVENT OUT
SOLVENT IN







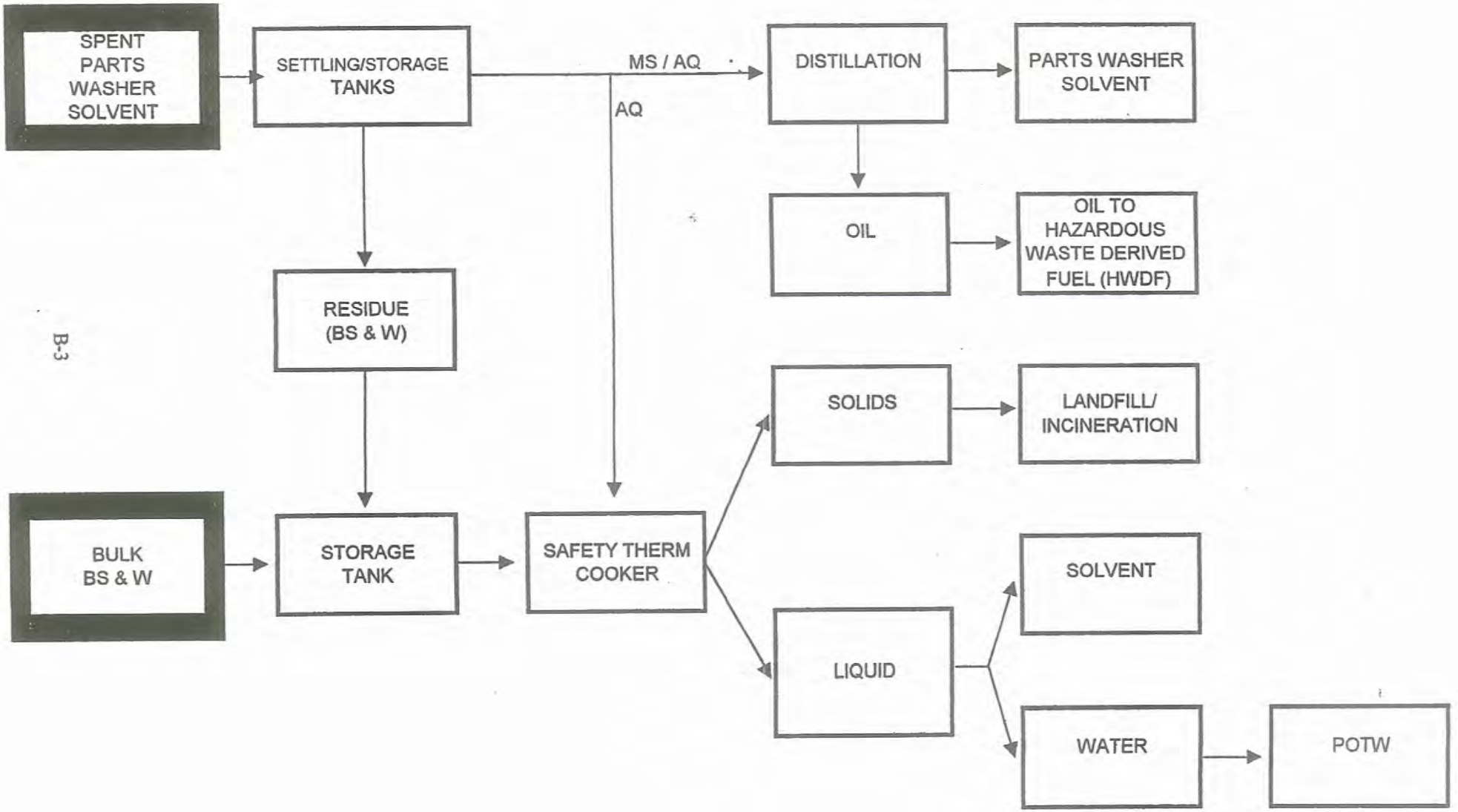
APPENDIX B

PROCESS FLOW DIAGRAMS

Exhibits

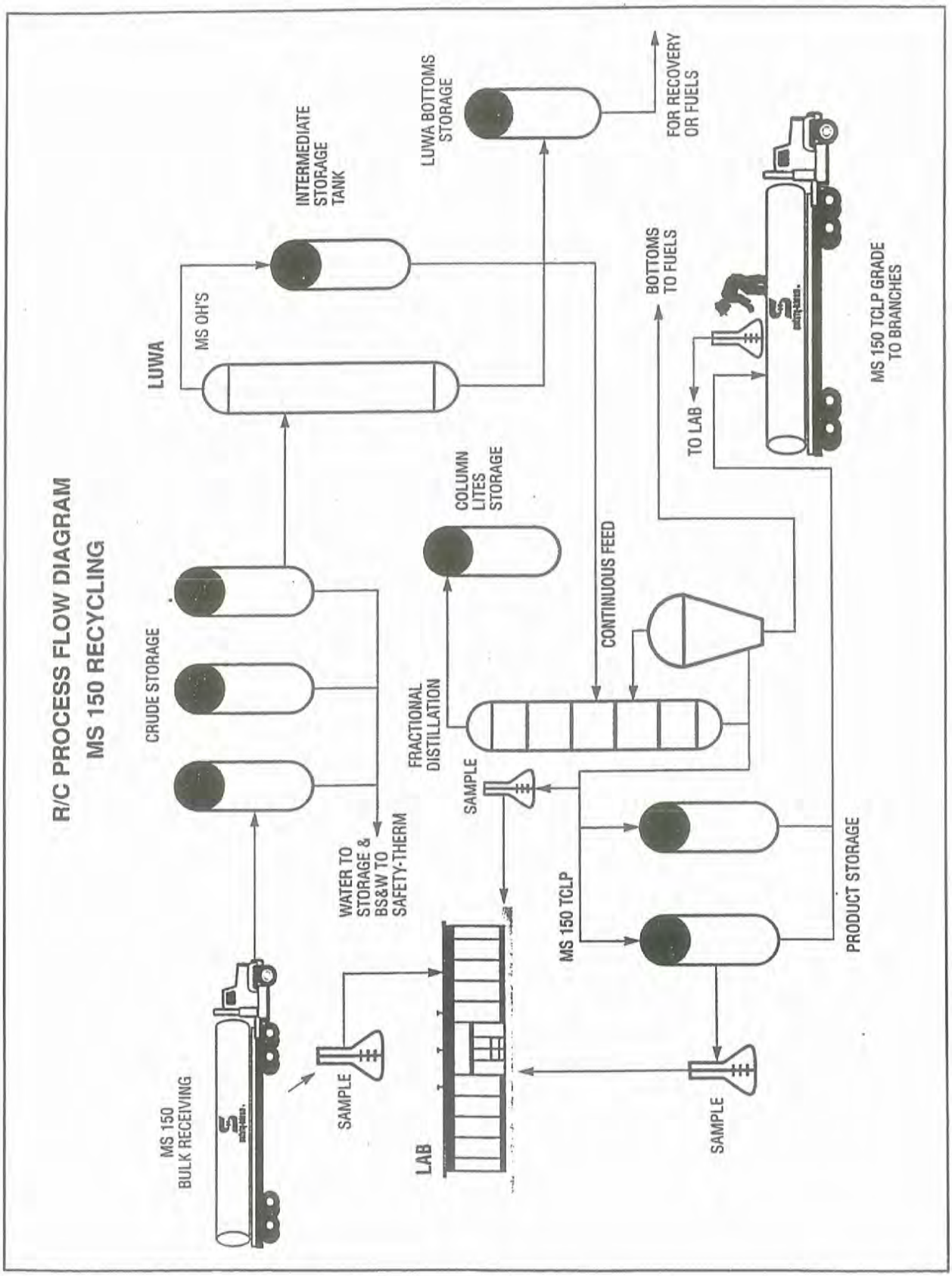
B-1	RECYCLING CENTER – PARTS WASHER PROCESS
B-2	PROCESS FLOW - 150 RECYCLING
B-3	PROCESS FLOW – IMMERSION CLEANER
B-4	PROCESS FLOW – BS&W AND AQUEOUS CLEAN ER
B-5	PROCESS FLOW – DRY CLEANING FILTERS
B-6	PROCESS FLOW – GUN CLEANER
B-7	BRANCH PROCESS – TEN DAY TRANSFER WASTE
B-8	BRANCH PROCESS – IMMERSION CLEANER, DRY CLEANING, PAINT, PHOTO CHEMICAL, ANTI FREEZE, AQUEOUS
B-9	BRANCH PROCESS – RETURN AND FILL
B-10	SAFETY-KLEEN SOLVENT USE AND REGENERATION LOOP

PARTS WASHER PROCESS



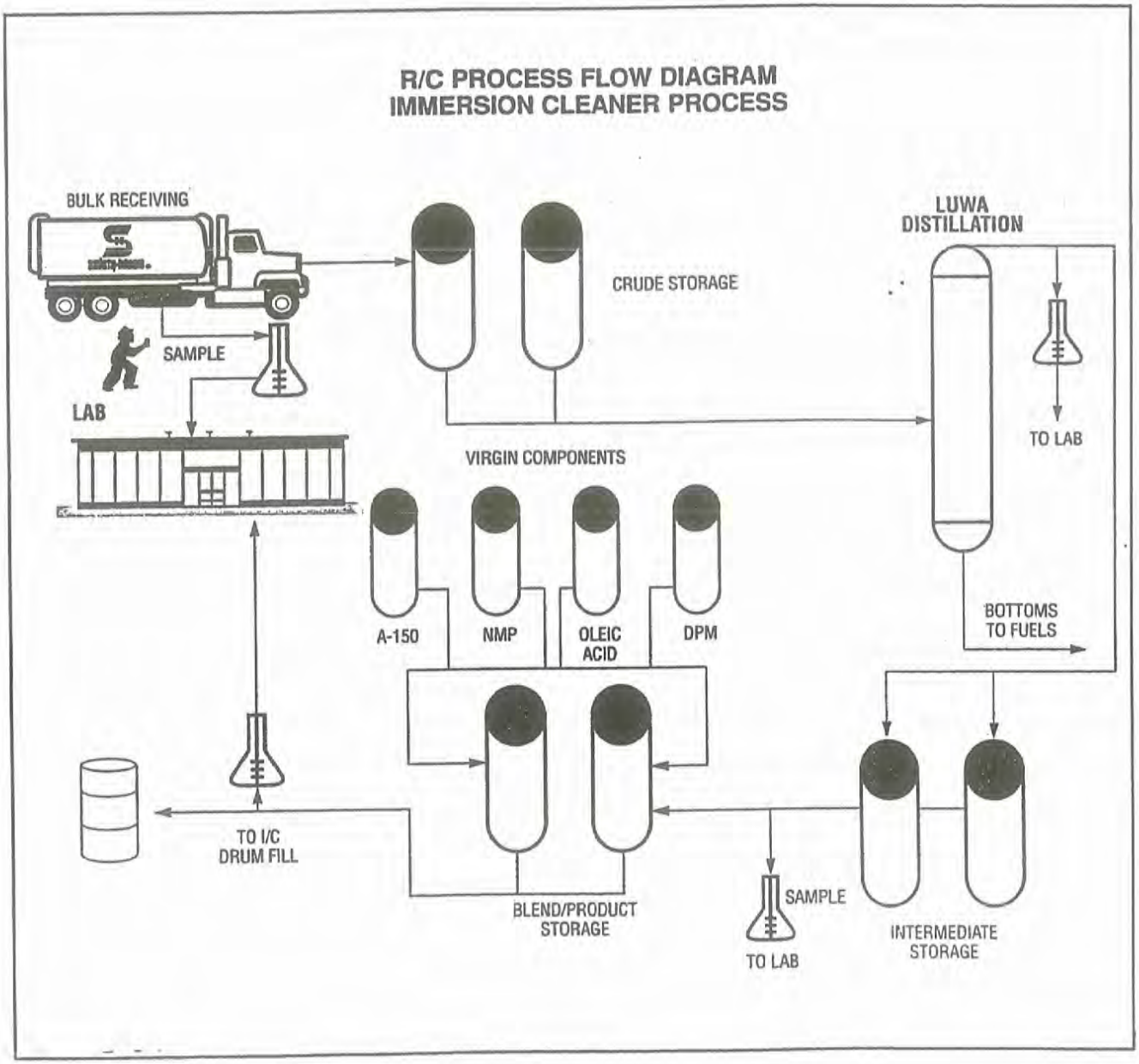
3/27/01

Waste Material Handling Processes

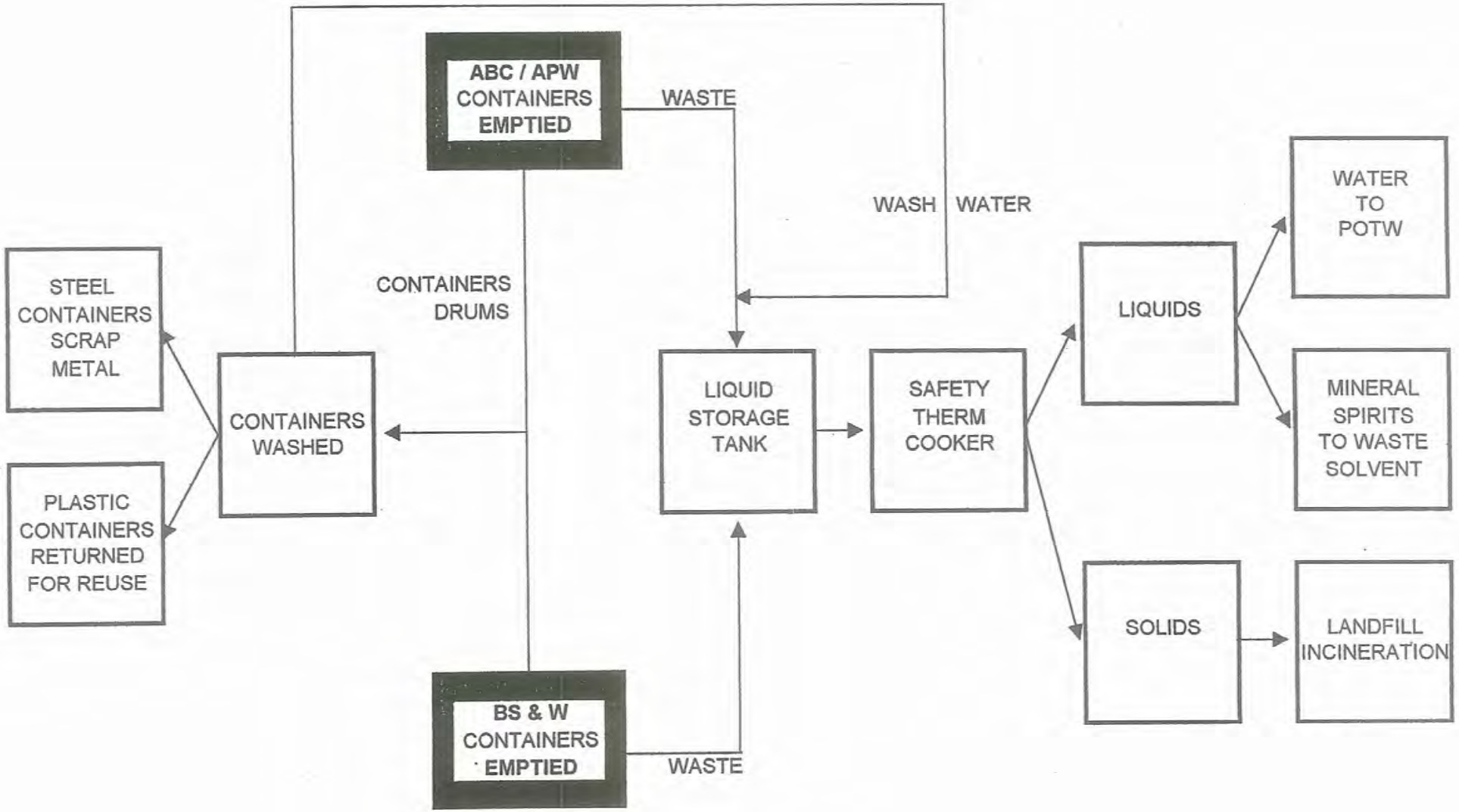


Immersion Cleaner Recycling

Immersion Cleaner is recycled by a process very similar to 105 Mineral Spirits. The used immersion cleaner is first distilled to remove contaminants. Virgin mineral spirits 150, N-methyl-2-pyrolidone (NMP), dipropylene glycol monomethyl ether (DPM), and oleic acid are used to reformulate S-K IC 699 to product specification. Note the extensive testing to assure a consistent quality product.



B S & W AND AQUEOUS CLEANER CONTAINERS

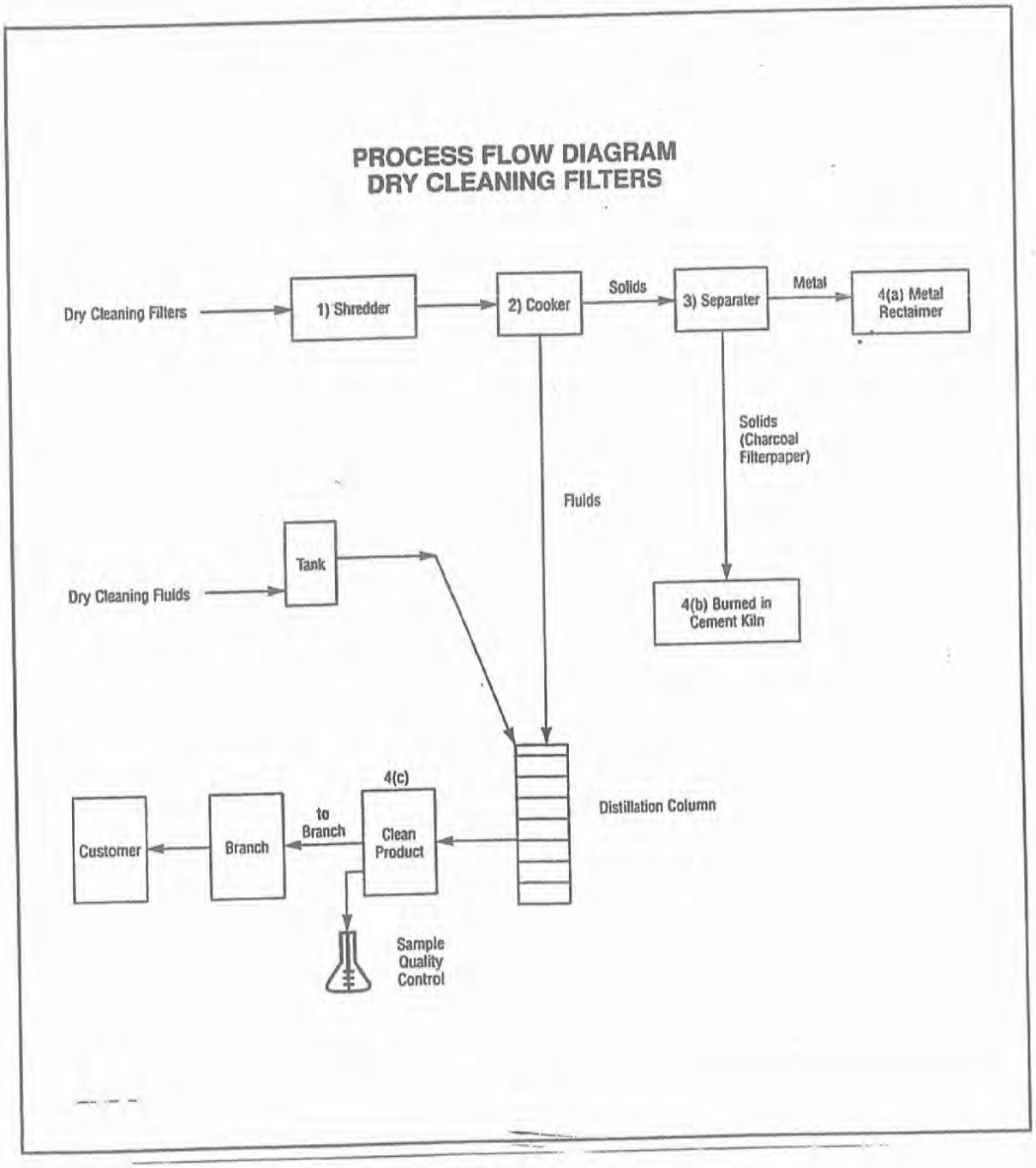


3/16/01

Dry cleaning filters

Dry cleaning filters are:

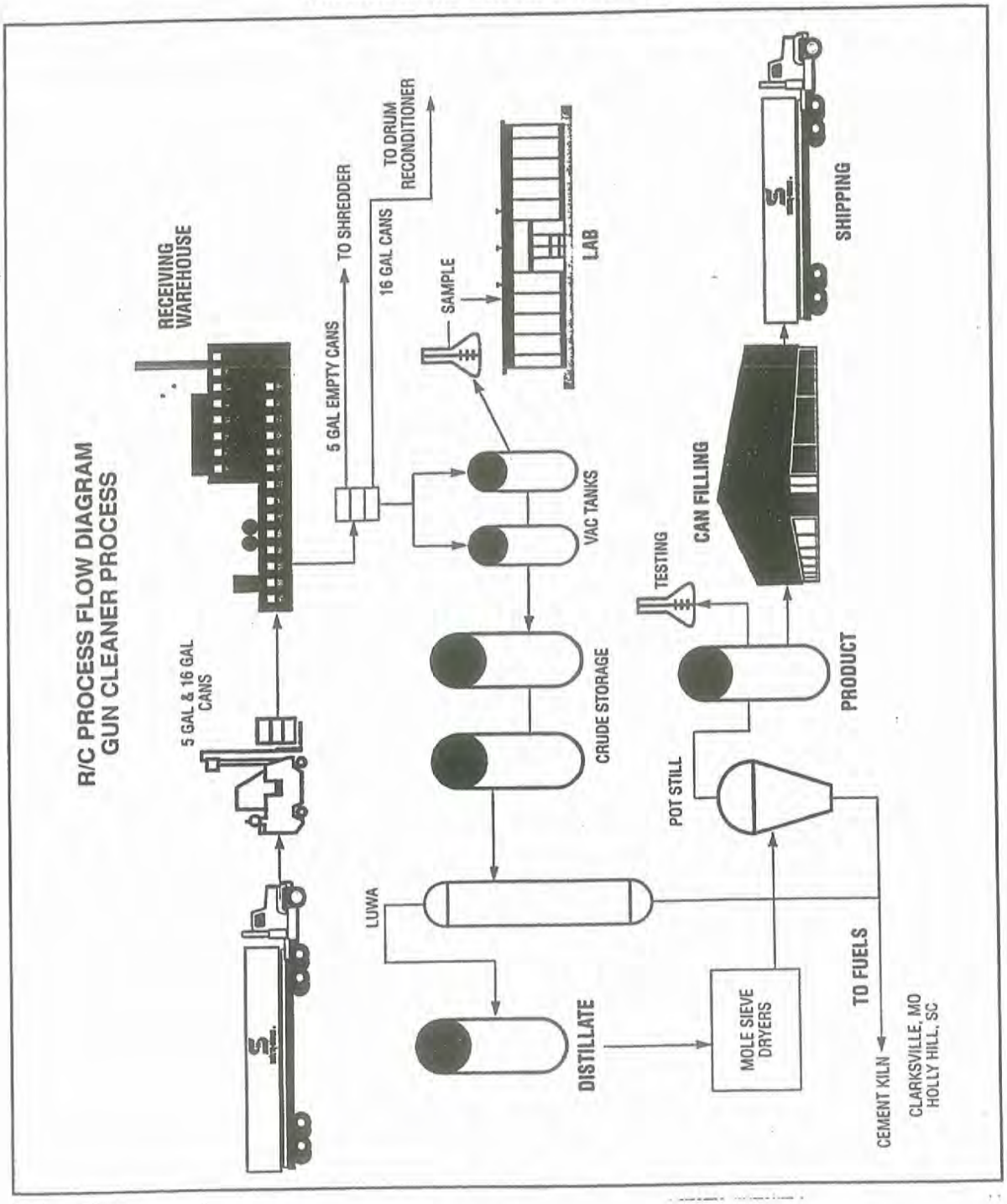
1) Crushed and shredded
2) Cooked to remove cleaning fluids
3) Placed in a machine that separates metal from filter fabric and charcoal
4) Recycled to
   a) metal reclaimer,
   b) fuel use for cement kilns, or
   c) reuse of solvent.



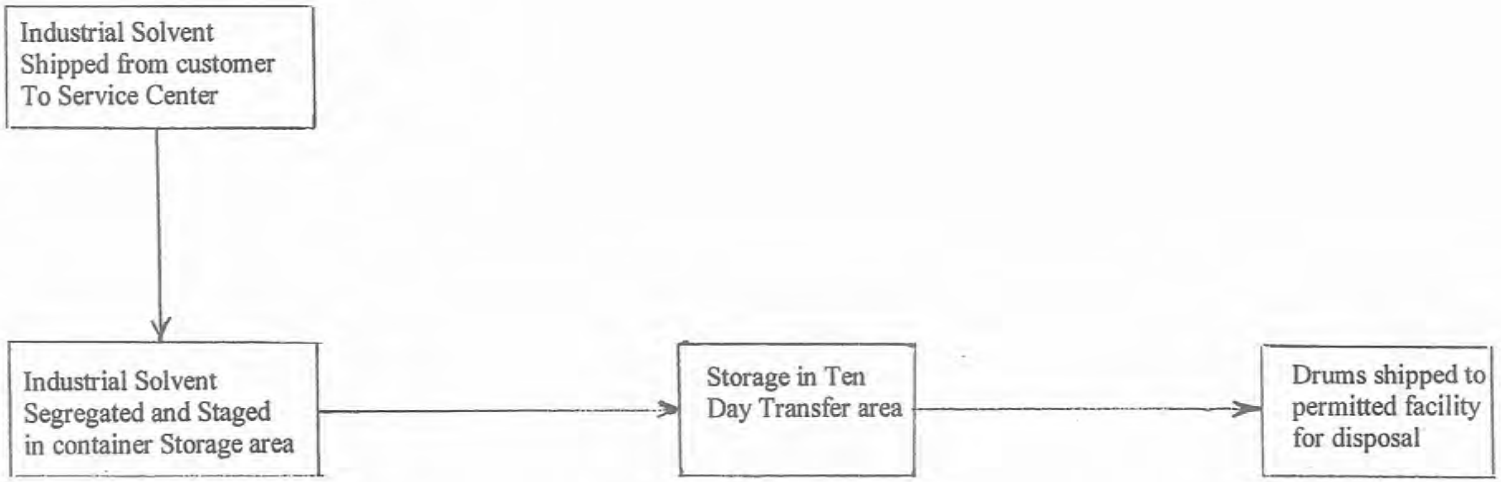
Waste Material Handling Processes

How is Gun Cleaner Recycled?

Gun Cleaner waste fluids are removed from 5 and 16 gallon cans by vacuum. It is then stored until a first distillation is performed in a LUWA. Following removal of water in a mole sieve dryer, the material is distilled a second time in a pot still. Still bottoms from distillation are fuel blended for the cement kilns.



UNIT PROCESS FOR THE HANDLING OF TEN-DAY TRANSFER WASTE

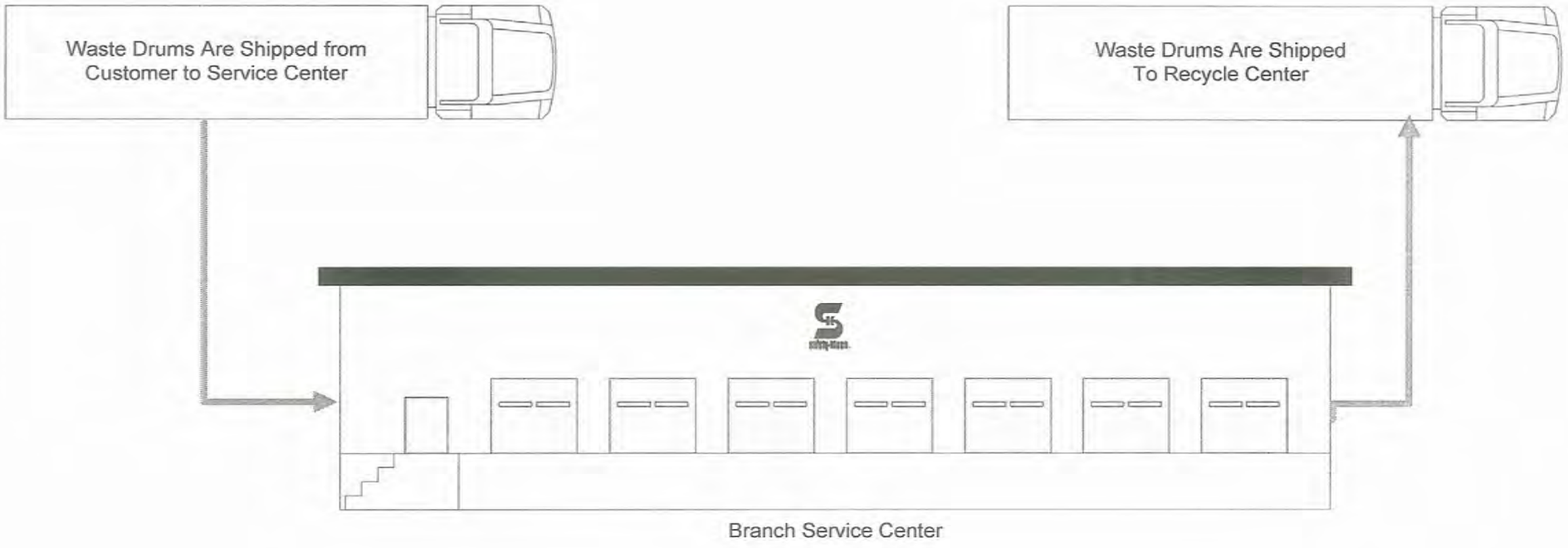


B-8 Unit Process for Handling Wastes in Containers

Includes Spent Immersion Cleaner, Dry Cleaning Waste, Paint Waste, Aqueous Solvents

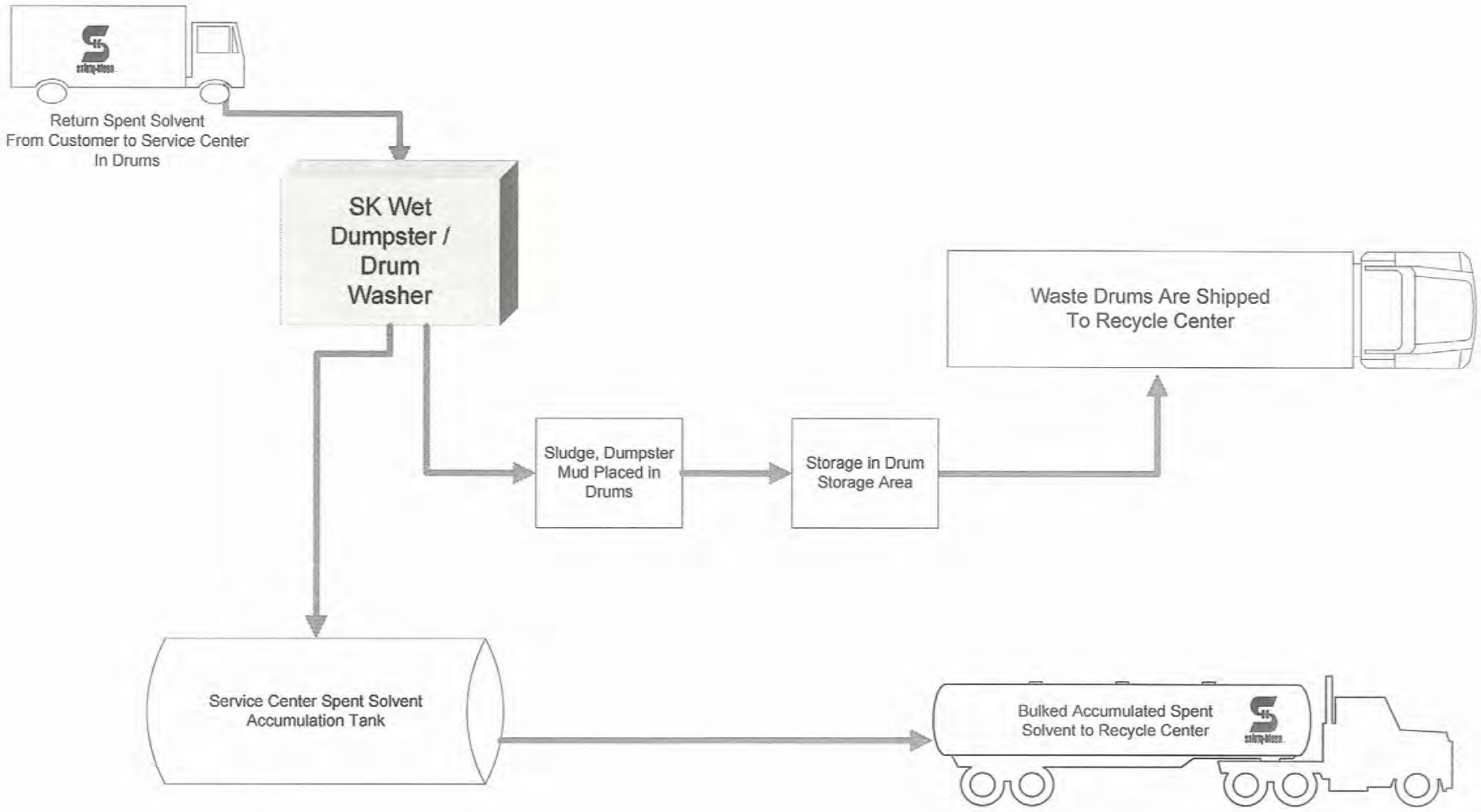
Various Transfer Industrial Wastes

Exhibit B-2



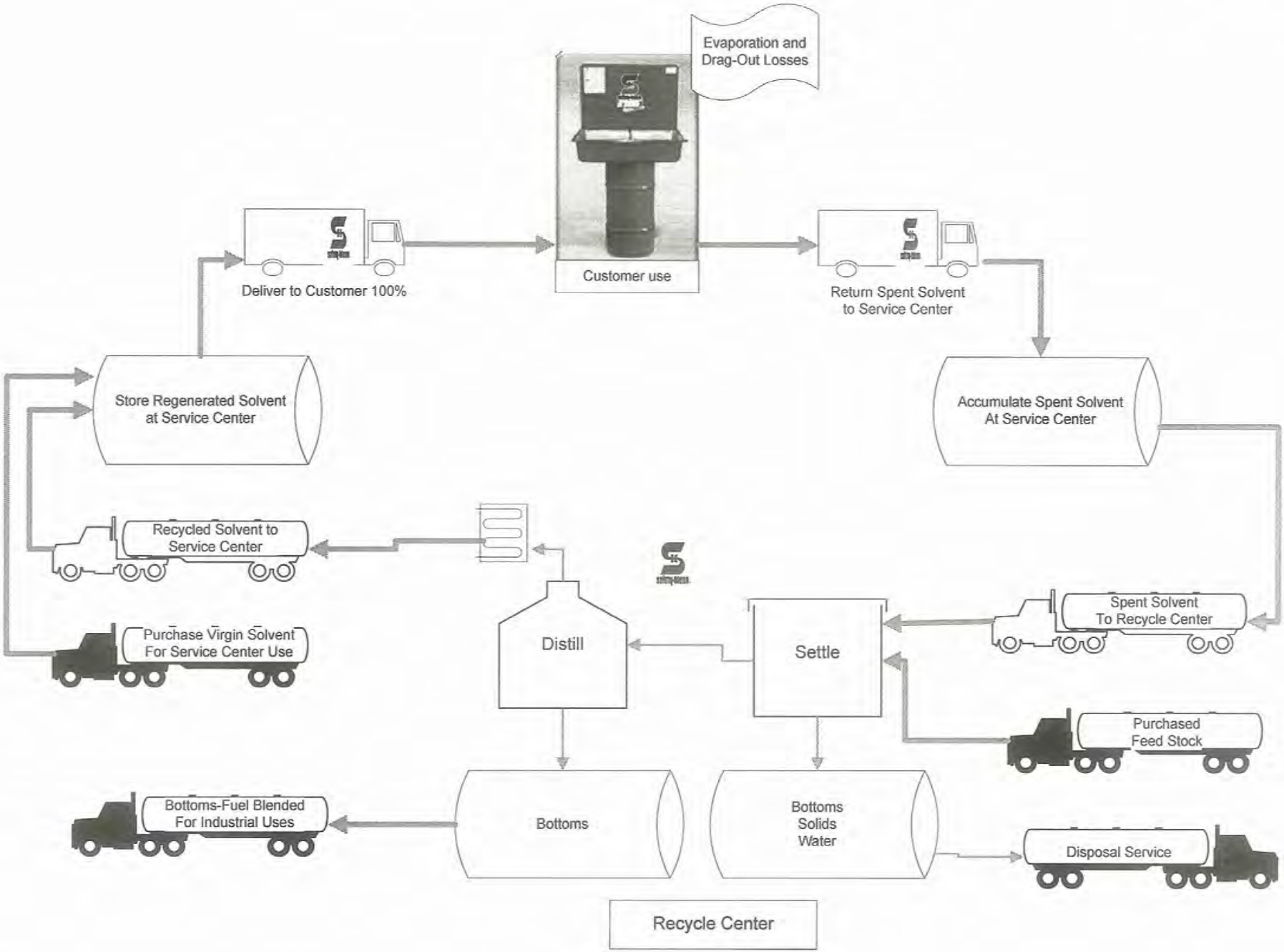
Branch Service Center

B-9 Unit Process for the Handling of Spent Parts Washer Solvent



B-10 Safety-Kleen Solvent Use & Regeneration Loop

Exhibit B-1



APPENDIX C

MAPS AND FACILITY DRAWINGS

Exhibits

C-1 GENERAL LOCATION MAP

C-2 TOPOGRAPHIC MAP

C-3 TOPOGRAPHIC MAP

C-4 ZONING MAP

C-5 PLAT MAP

C-6 DRINKING WATER CONNECTION MAP

C-7 MAP INDICATING WATER, STORM SEWER AND SANITARY SEWER CONNECTIONS

C-8 FLOOD PLAIN MAP

C-9 WIND ROSE FOR BOISE, IDAHO

C-10 SITE PLAN AND PERMITTED AREAS

C-11 FLOOR PLAN FOR THE CONTAINER STORAGE AREAS AND RETURN/FILL STATION

C-12 TRAFFIC FLOW PATTERN

EXHIBIT C-1

GENERAL LOCATION MAP

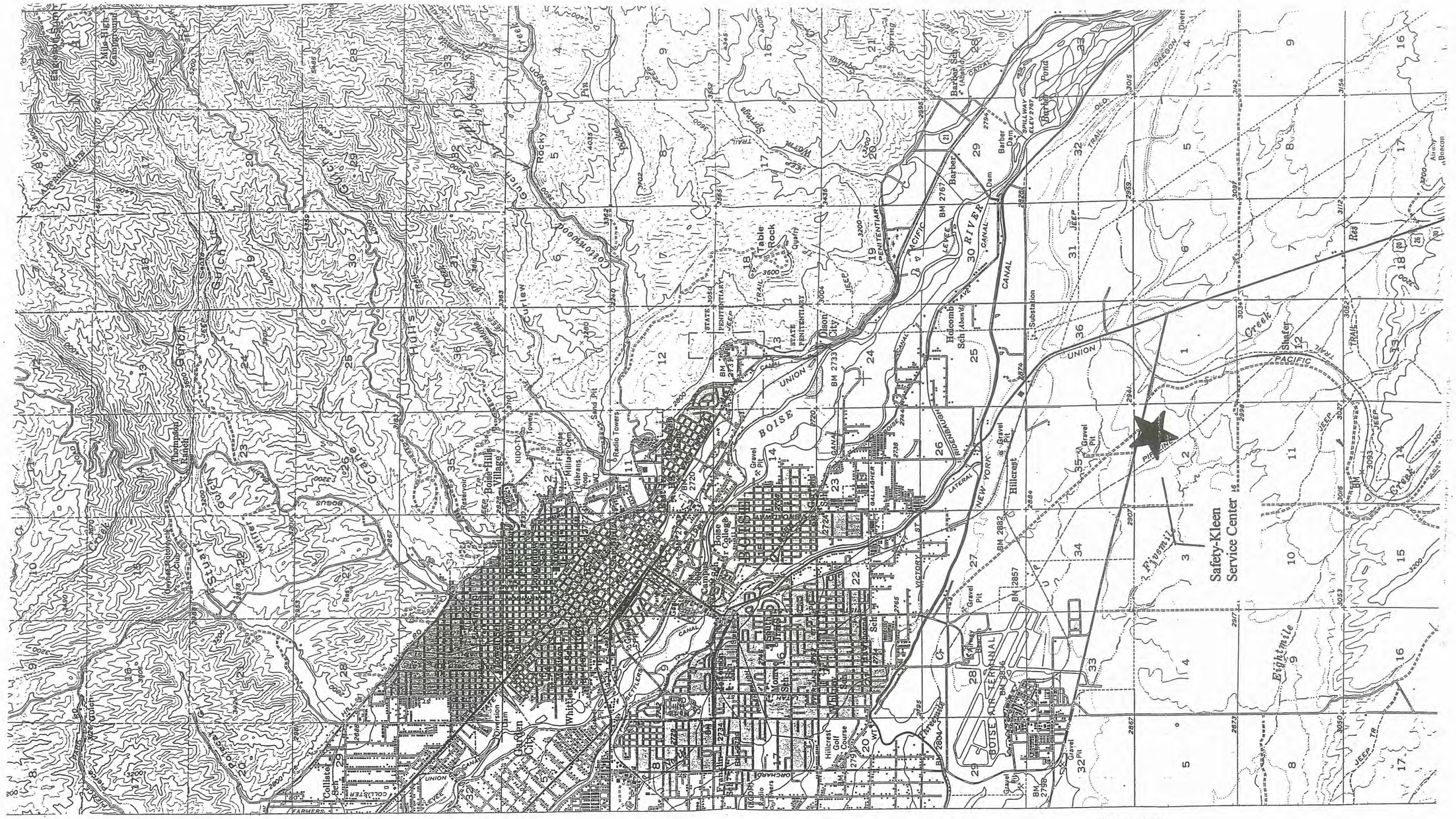
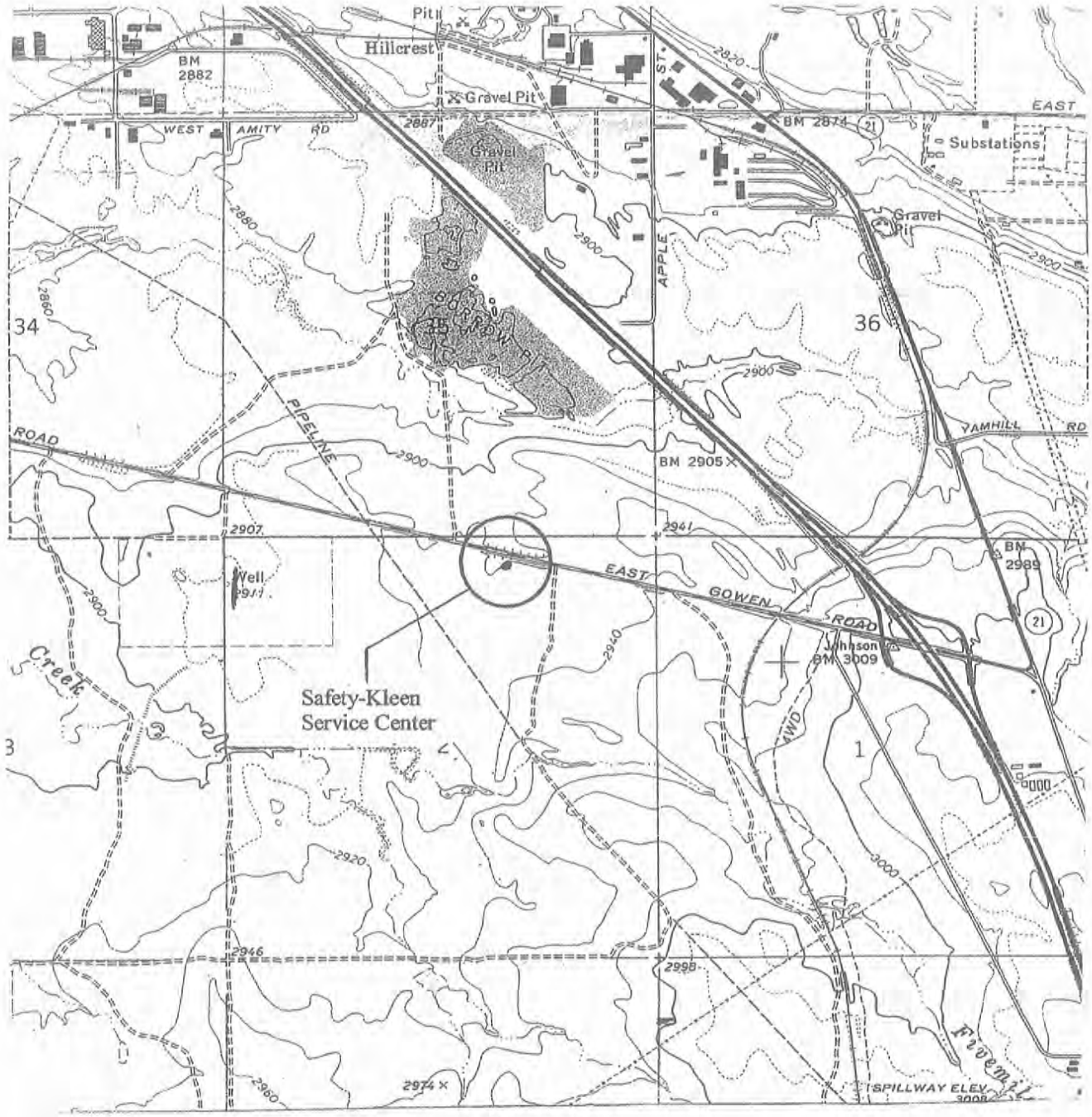


FIGURE C-1: LOCATION MAP, SAFETY-KLEEN SYSTEMS, INC. SERVICE CENTER, BOISE IDAHO

EXHIBIT C-2

TOPOGRAPHIC MAP



SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

ROAD CLASSIFICATION

Primary highway, hard surface

Secondary highway, hard surface

Light-duty road, hard or improved surface

Unimproved road

Interstate Route U. S. Route State Route

QUADRANGLE LOCATION

BOISE SOUTH, IDAHO

43116-E2-TF-024

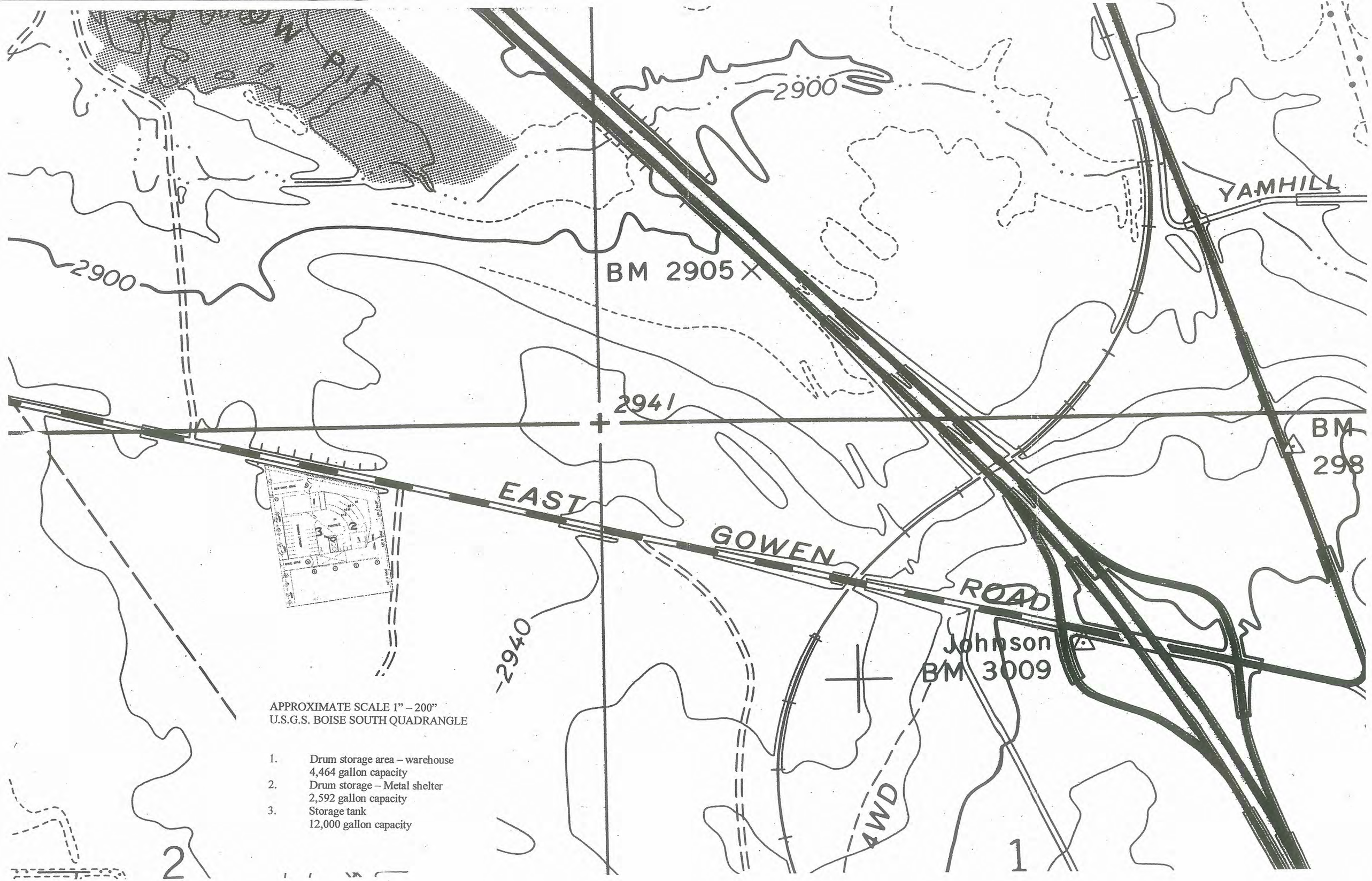
PHOTOINSPECTED 1976

1972

DMA 2771 II SW-SERIES V893

EXHIBIT C-3

TOPOGRAPHIC MAP



APPROXIMATE SCALE 1" – 200"
U.S.G.S. BOISE SOUTH QUADRANGLE

1. Drum storage area – warehouse
   4,464 gallon capacity
2. Drum storage – Metal shelter
   2,592 gallon capacity
3. Storage tank
   12,000 gallon capacity

EXHIBIT C-4

ZONING MAP

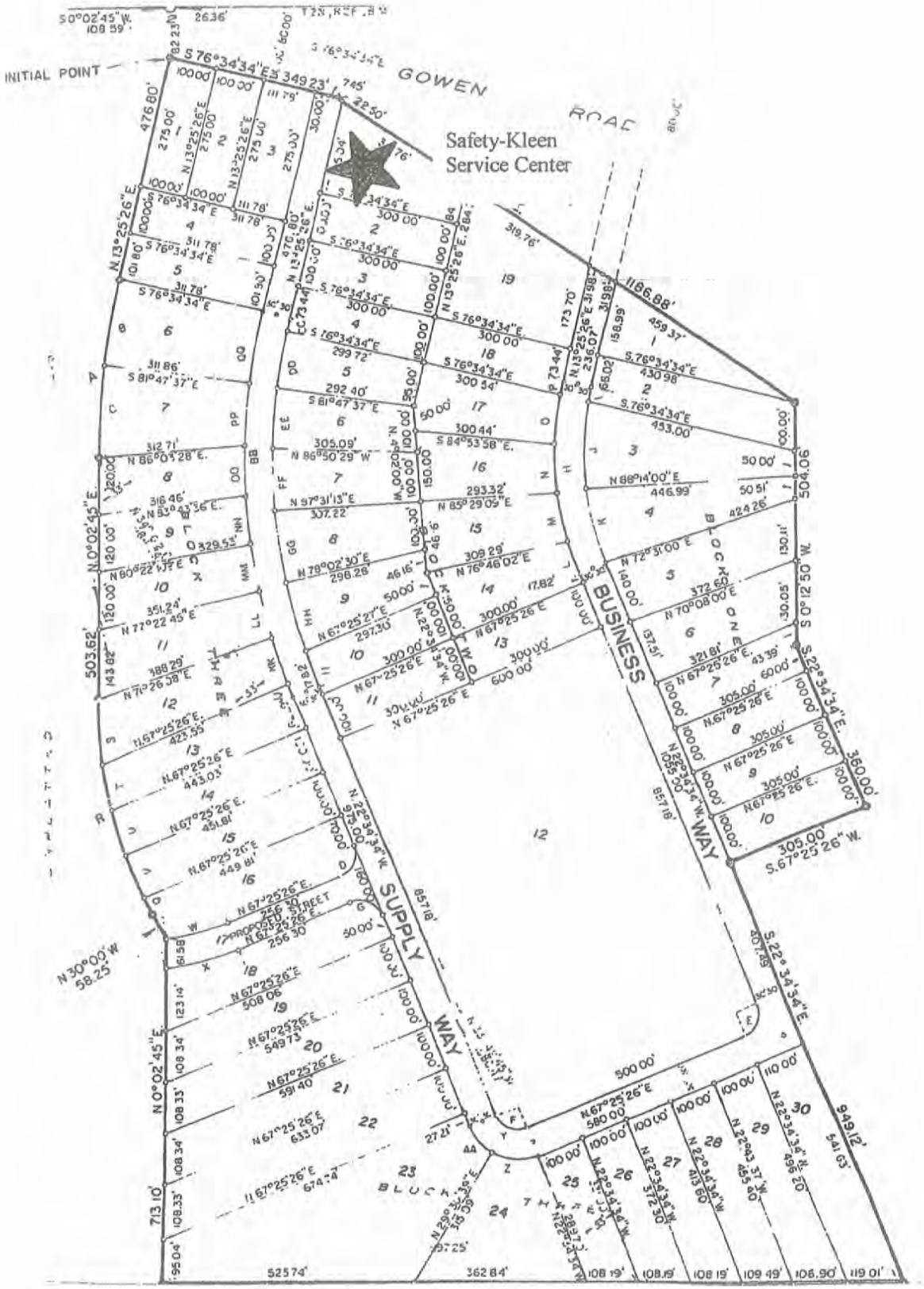

INITIAL POINT
GOWEN ROAD
Safety-Kleen
Service Center
BUSINESS WAY
SUPPLY WAY
BLOCK ONE
BLOCK TWO
BLOCK THREE
BLOCK FOUR
BLOCK FIVE
BLOCK SIX
BLOCK SEVEN
BLOCK EIGHT
BLOCK NINE
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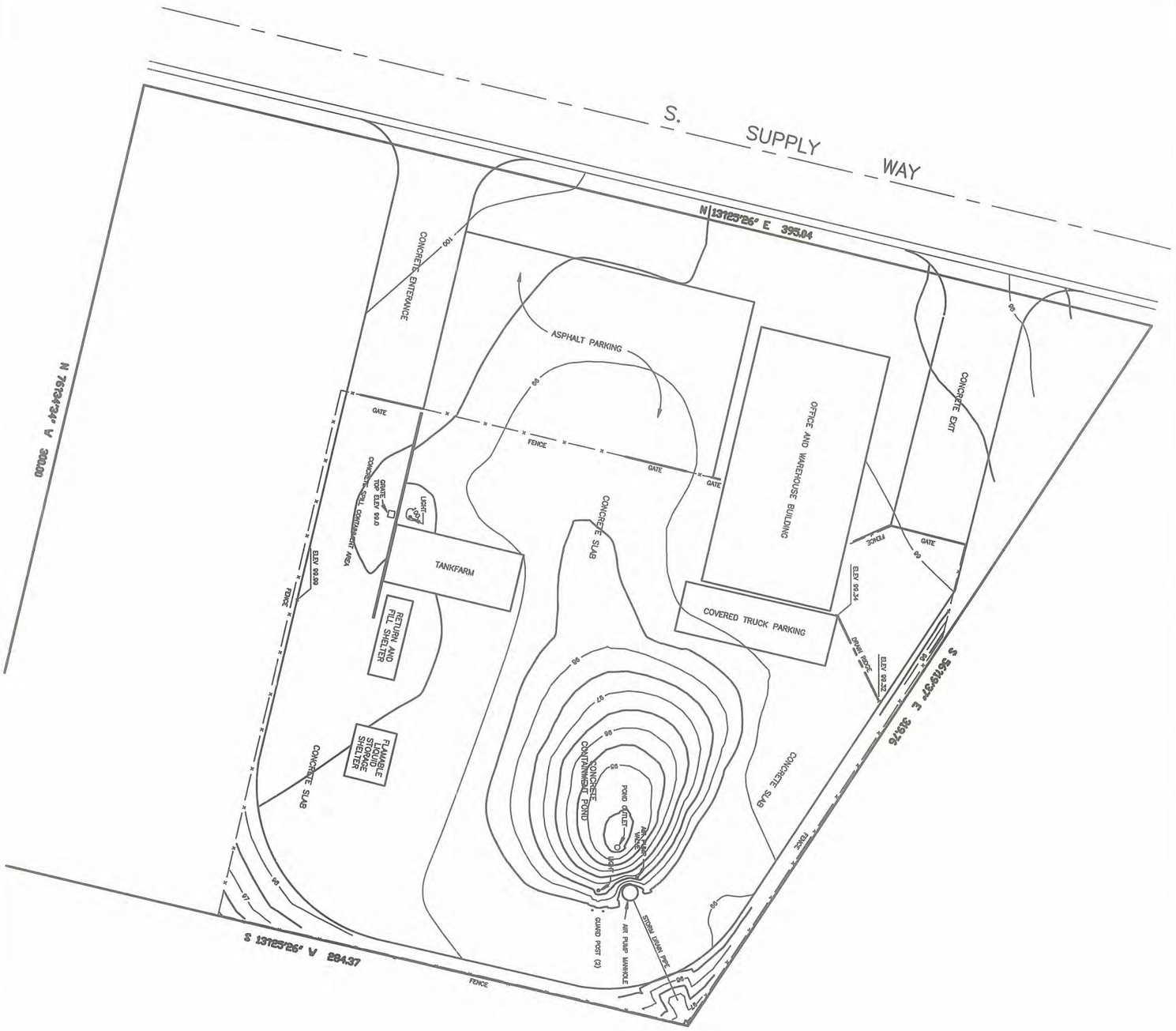
EXHIBIT C-5

PLAT MAP

PLAT MAP
SAFETY-KLEEN SYSTEMS
C-5

EXHIBIT C-7

MAPS INDICATING WATER, STORM SEWER AND SANITARY SEWER



CERTIFICATES OF SURVEYOR

I, JOHN S. AUSTIN DO HEREBY CERTIFY THAT I AM A REGISTERED LAND SURVEYOR IN THE STATE OF IDAHO AND THAT THIS SKETCH WAS PREPARED FROM AN ACTUAL SURVEY MADE BY ME OR UNDER MY DIRECT SUPERVISION AND COMPLIES WITH ACCEPTED STANDARDS OF SURVEYING. I FURTHER CERTIFY THAT I HAVE COMPLIED WITH TITLE 55, CHAPTER 16, IDAHO CODE.

JOHN S. AUSTIN
IDAHO LIC. 5081

JOHN S. AUSTIN — 5081 — REGISTERED LAND SURVEYOR — STATE OF IDAHO

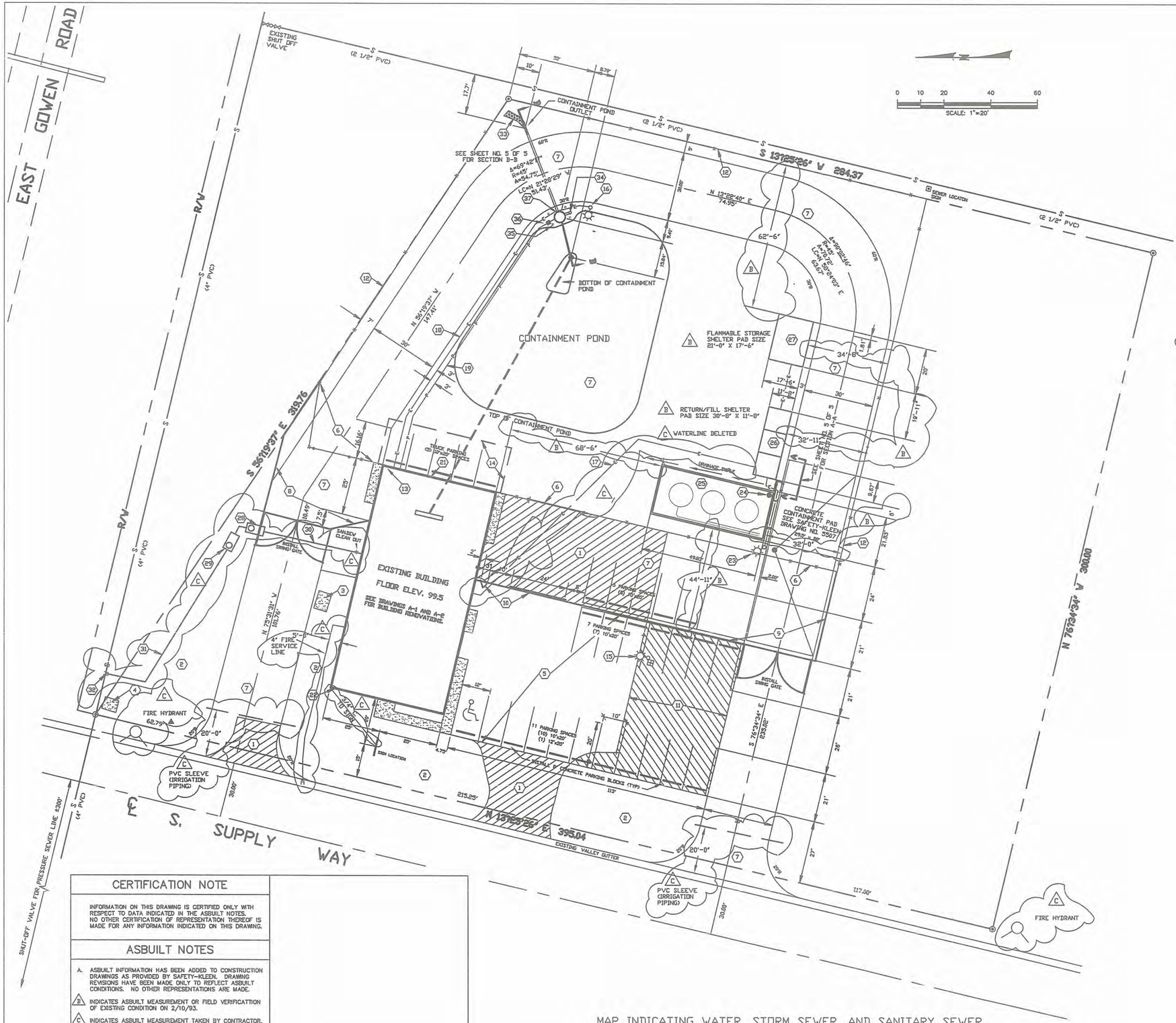
C-7

SHEET 1 OF 1	SAFETY-KLEEN CORP. LOTS 1 THRU 3, BLOCK 2 BOISE INDUSTRIAL FOUNDATION SUBDIVISION NO. 5 AS-BUILT	TOOTHMAN-ORTON ENGINEERING COMPANY CONSULTING ENGINEERS, SURVEYORS AND PLANNERS 1802 NORTH 33RD STREET BOISE, IDAHO 83703 (208) 342-5511

DATE: FEBRUARY 17, 1993
PROJECT: 7114-SPSD-005

REVISIONS NO.	ITEM	DATE

E-FILE NAME: 91032
DESIGNED: JR
DRAWN: SC
CHECKED:
APPROVED:



MAP INDICATING WATER, STORM SEWER, AND SANITARY SEWER
C-7

CERTIFICATION NOTE

INFORMATION ON THIS DRAWING IS CERTIFIED ONLY WITH RESPECT TO DATA INDICATED IN THE ASBUILT NOTES. NO OTHER CERTIFICATION OF REPRESENTATION THEREOF IS MADE FOR ANY INFORMATION INDICATED ON THIS DRAWING.

ASBUILT NOTES

A. ASBUILT INFORMATION HAS BEEN ADDED TO CONSTRUCTION DRAWINGS AS PROVIDED BY SAFETY-KLEEN. DRAWING REVISIONS HAVE BEEN MADE ONLY TO REFLECT ASBUILT CONDITIONS. NO OTHER REPRESENTATIONS ARE MADE.

(B) INDICATES ASBUILT MEASUREMENT OR FIELD VERIFICATION OF EXISTING CONDITION ON 2/10/93.

(C) INDICATES ASBUILT MEASUREMENT TAKEN BY CONTRACTOR.

KEY NOTES

1. REMOVE EXISTING ASPHALT
2. LANDSCAPE AREA, SEE SHEET NO. 4 OF 5 FOR LANDSCAPE PLAN.
3. POWER TRANSFORMER (RETAIN AND PROTECT).
4. INTERMOUNTAIN GAS REGULATOR STATION (RETAIN AND PROTECT).
5. EXISTING ASPHALT PARKING AREA (RETAIN AND PROTECT). RESEAL WITH ASPHALT SEALANT.
6. REMOVE EXISTING FENCE AND GATES.
7. INSTALL CONCRETE PAVING, SEE SHEET NO. 5 OF 5 FOR TYPICAL SECTION.
8. INSTALL ±80 L.F. 6' CHAIN LINK FENCE WITH SCREEN SLATS AND 3 STRANDS BARBED WIRE AND SWING GATE.
9. INSTALL ±133 L.F. 6' CHAIN LINK FENCE WITH SCREEN SLATS AND 3 STRANDS BARBED WIRE AND SWING GATE.
10. INSTALL 6'x24' CHAIN LINK ROLL GATE AND 3' WIDE PASSAGE GATE WITH SCREEN SLATS AND 3 STRANDS BARBED WIRE.
11. INSTALL ASPHALT PARKING AREA, SEE SHEET NO. 5 OF 5 FOR TYPICAL SECTION.
12. EXISTING FENCE (RETAIN AND PROTECT)
13. INSTALL A 5 HP AIR COMPRESSOR WITH A 80 GALLON AIR TANK INSIDE BUILDING. CONNECT COMPRESSOR TO AIR LINE TO CONTAINMENT POND PLUMBING SYSTEM.
14. REMOVAL AND INSTALLATION OF NEW CANOPY BY OTHERS.
15. RELOCATE EXISTING YARD LIGHT AND INSTALL A 110v ELECTRICAL OUTLET ON POLE. REMOVE EXISTING LIGHT STANDARD BASE.
16. INSTALL YARD LIGHT WITH 110v ELECTRICAL OUTLET ON POLE.
17. INSTALL ELECTRICAL SERVICE IN ELECTRICAL CONDUIT TO THE "RETURN AND FILL SHELTER", "LIQUID STORAGE SHELTER" AND THE "RELOCATED YARD LIGHT".
18. INSTALL ELECTRICAL SERVICE IN ELECTRICAL CONDUIT TO NEW YARD LIGHT.
19. INSTALL AIR LINE FROM COMPRESSOR TO CONTAINMENT POND PUMP IN 2" PVC CONDUIT.
20. NOT USED (C)
21. INSTALL A 110v ELECTRICAL OUTLET MOUNTED ON OUTSIDE OF BUILDING WALL AT EACH OF FIVE PARKING STALLS.
22. FUTURE FIRE DEPARTMENT CONNECTION, KNOX BOX LOCATION AND FIRE SPRINKLER SIGN. SEE SHEET NO. 5 OF 5 FOR SIGN DETAIL.
23. RELOCATED YARD LIGHT (SEE KEY NOTE NO. 15).
24. SEE SUMP DETAIL SAFETY-KLEEN DRAWING NO. 5.
25. THREE TANKFARM STORAGE FACILITY. SEE SAFETY-KLEEN DRAWING NO. 4.
26. 10'x30' THREE BAY RETURN AND FILL SHELTER. SEE DRAWING NO. B-2.
27. 15'x20' FLAMABLE LIQUID STORAGE SHELTER. SEE DRAWING NO. B-3.
28. EXISTING 1000 GALLON SEPTIC TANK, VERIFY LOCATION AND SIZE.
29. INSTALL 750 GALLON SEPTIC TANK FOR CLEAR LIQUID PUMPING CHAMBER. ASPHALT COATED INSIDE AND OUT.
30. INSTALL ±36 L.F. OF 4" PVC SEWER PIPE.
31. INSTALL ±116 L.F. OF 1 1/2" PVC PRESSURE SEWER PIPE.
32. CONNECT TO EXISTING 4" PVC PRESSURE SEWER LINE. A SEWER TAP PERMIT IS REQUIRED BY BOISE CITY PRIOR TO CONNECTION. THE 4" PRESSURE SEWER LINE CANNOT BE SHUT DOWN TO MAKE TAP.
33. RIPRAPED DRAINAGE CHANNEL. RIPRAP TO BE 4"-6" STONE.
34. TANKER HOOKUP CONNECTION PIPE.
35. INSTALL 4 GALVANIZED IRON PIPE BOLLARDS.
36. INSTALL AIR PRESSURE SHUT-OFF VALVE. SEE DETAIL SHEET NO. 5 OF 5.
37. MANHOLE WITH SUBMERSIBLE PUMP. SEE SHEET NO. 5 OF 5 FOR CROSS SECTION AND DETAILS.

SEPTIC SYSTEM NOTES

1. SEPTIC SYSTEM TO BE A DUAL TANK SYSTEM. THE FIRST TANK TO RETAIN ALL SOLIDS AND THE SECOND TANK FOR PUMPING CLEAR LIQUIDS INTO PRESSURE SEWER SYSTEM.
2. CONTRACTOR TO PROVIDE AND INSTALL ELECTRICAL PANEL WITH CIRCUIT BREAKER, ALARM LIGHT AND AUDIBLE ALARM.
3. CONTRACTOR TO PROVIDE AND INSTALL 750 GALLON SEPTIC TANK FOR CLEAR LIQUID PUMPING CHAMBER, SUBMERSIBLE EFFLUENT PUMP (PEABODY-BARNES STEP102 OR APPROVED EQUAL), ALL PIPING, CHECK VALVE, 1 1/2" BRASS GATE VALVE IN OUTLET PIPE AND MERCURY FLOAT SWITCHES FOR ON, OFF AND ALARM.
4. CONTRACTOR MAY REFER TO CTH ENGINEERING DRAWING OF "INDIVIDUAL PUMPING SYSTEMS", DATED JUNE 13, 1980, FOR TYPICAL PUMPING SYSTEM LAYOUT. THIS DOCUMENT IS INCLUDED IN THESE CONSTRUCTION PLANS AS SHEET NO. S-1.
5. A PLUMBING PERMIT IS REQUIRED FROM THE BOISE CITY BUILDING DEPARTMENT FOR ALL ONSITE SEWER WORK.

BENCH MARKS

T.B.M. NO. 1 - TOP OF N.W. BOLT ON LIGHT POLE
ASSUMED ELEV. 100.00

REVISIONS		
NO.	ITEM	DATE
1	KEY NOTE 31 & 32, SEPTIC SYSTEM NOTE NO. 5	3/19/92
2	KEY NOTE 7, 8 & 9, ADDITIONAL PVMT REMOVAL	5/29/92
3	ADD 2 COLLECTION INLETS TO EXIST BUILDING	6/24/92
4	DELETE 2 COLLECTION INLETS TO EXIST BLDG.	8/26/92
5	ASBUILT	3/03/93

PROJECT NO.	91032
DESIGNED	JF
DRAWN	JF/SC
CHECKED	LOL/HB
APPROVED	

TOOTHMAN-ORTON ENGINEERING COMPANY
CONSULTING ENGINEERS, SURVEYORS AND PLANNERS
1802 NORTH 33RD STREET
BOISE, IDAHO 83703
(208) 342-5511

SAFETY-KLEEN CORP.

LOTS 1 THRU 3, BLOCK 2
BOISE INDUSTRIAL FOUNDATION SUBDIVISION NO. 5

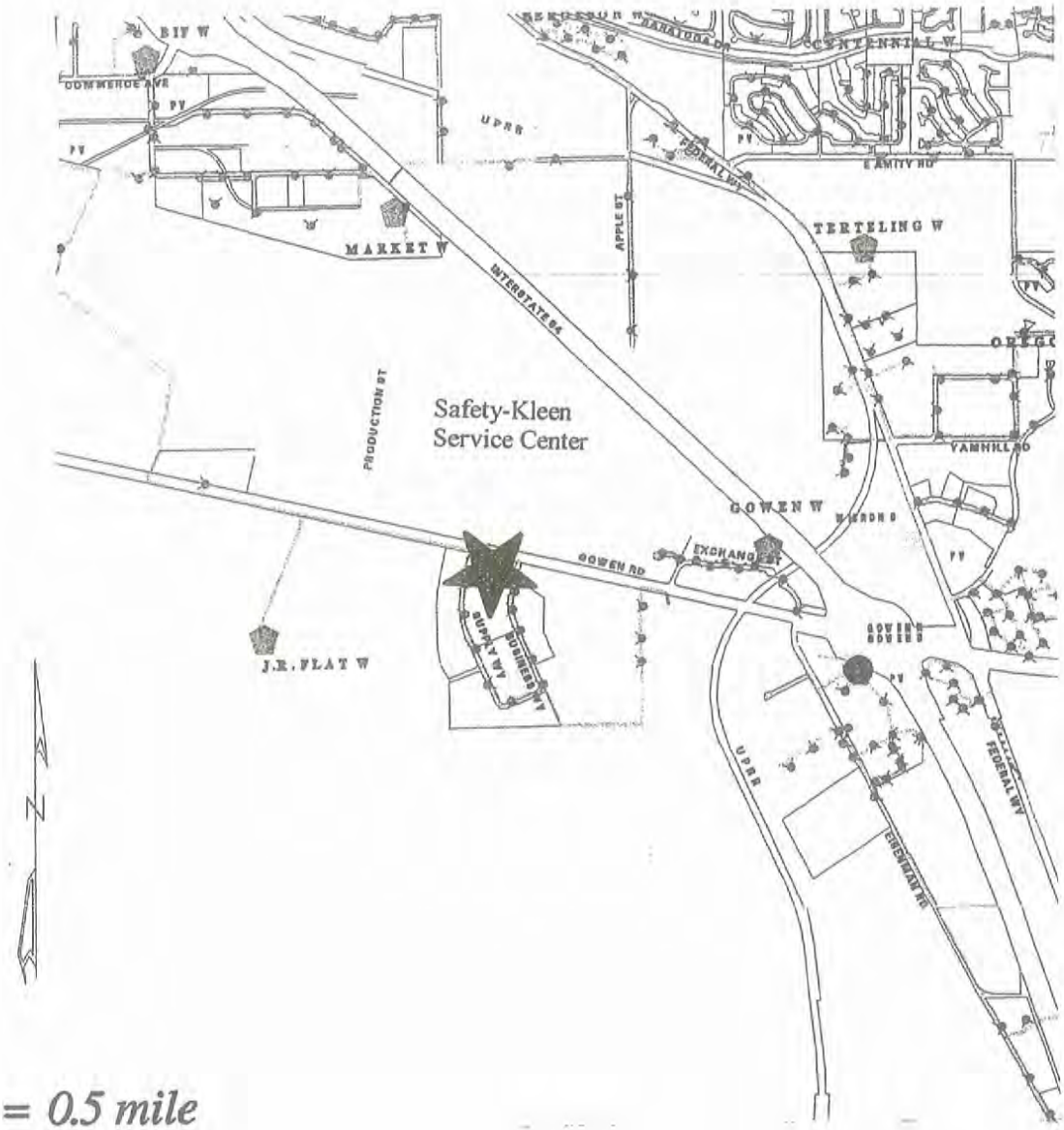
SITE LAYOUT AND UTILITY PLAN

DATE: JANUARY 16, 1992
DRAWING: 7114-SP00-006

SHEET 2 OF 5

EXHIBIT C-6

DRINKING WATER CONNECTION MAP



1 inch = 0.5 mile

WELLS

RESERVOIRS

BOOSTER STATIONS

PRV

CHECK VALVE

FIRE HYDRANT

DRINKING WATER CONNECTION MAP
SAFETY-KLEEN SYSTEMS
C-6

EXHIBIT C-8

FLOOD PLAIN MAP

0775 G

:0875 G

NATIONAL FLOOD INSURANCE PROGRAM

B08

FIRM

FLOOD INSURANCE RATE MAP

ADA COUNTY,
IDAHO AND
INCORPORATED AREAS

(SEE TABLE SHOWN ABOVE FOR LISTING OF COMMUNITIES)

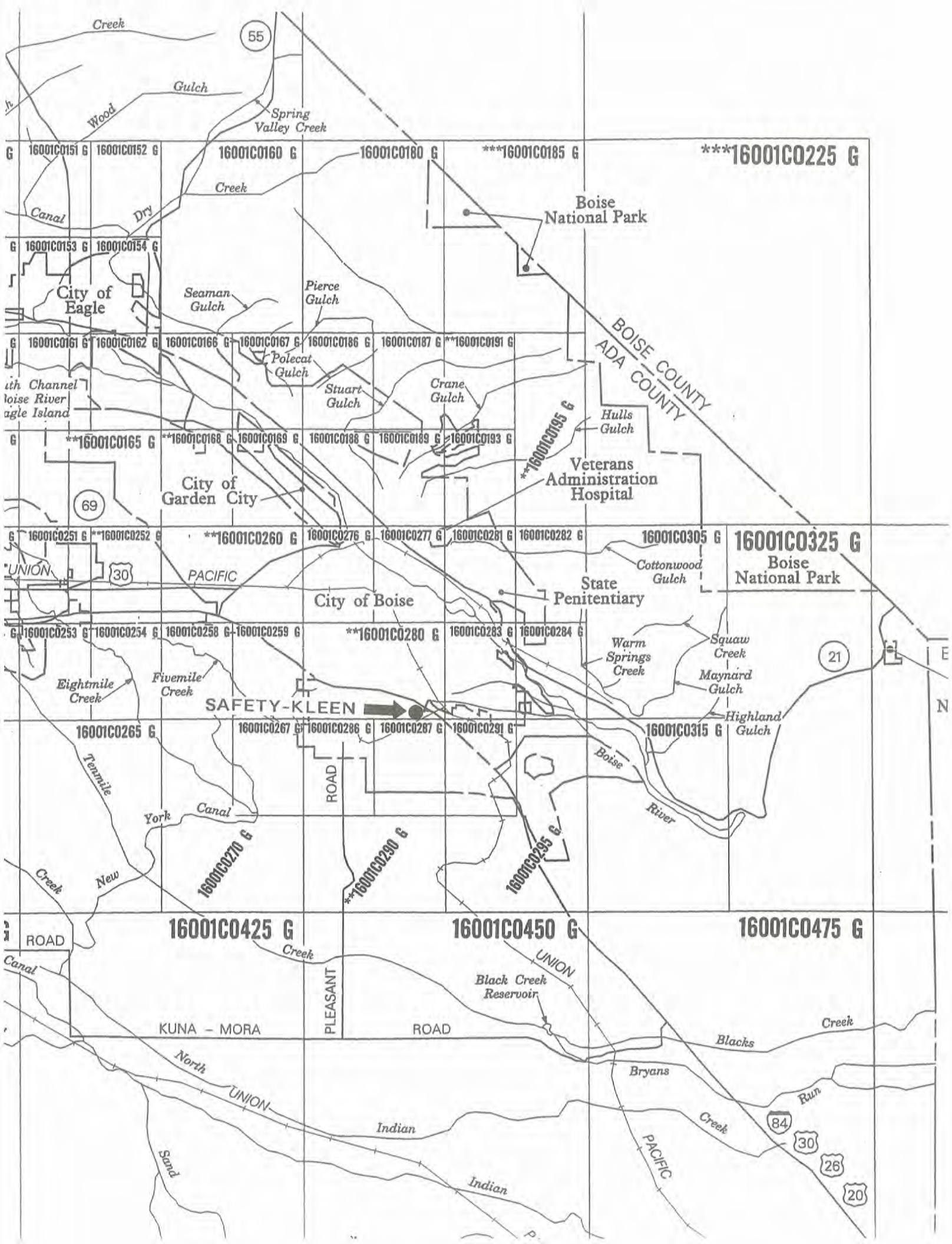
MAP INDEX

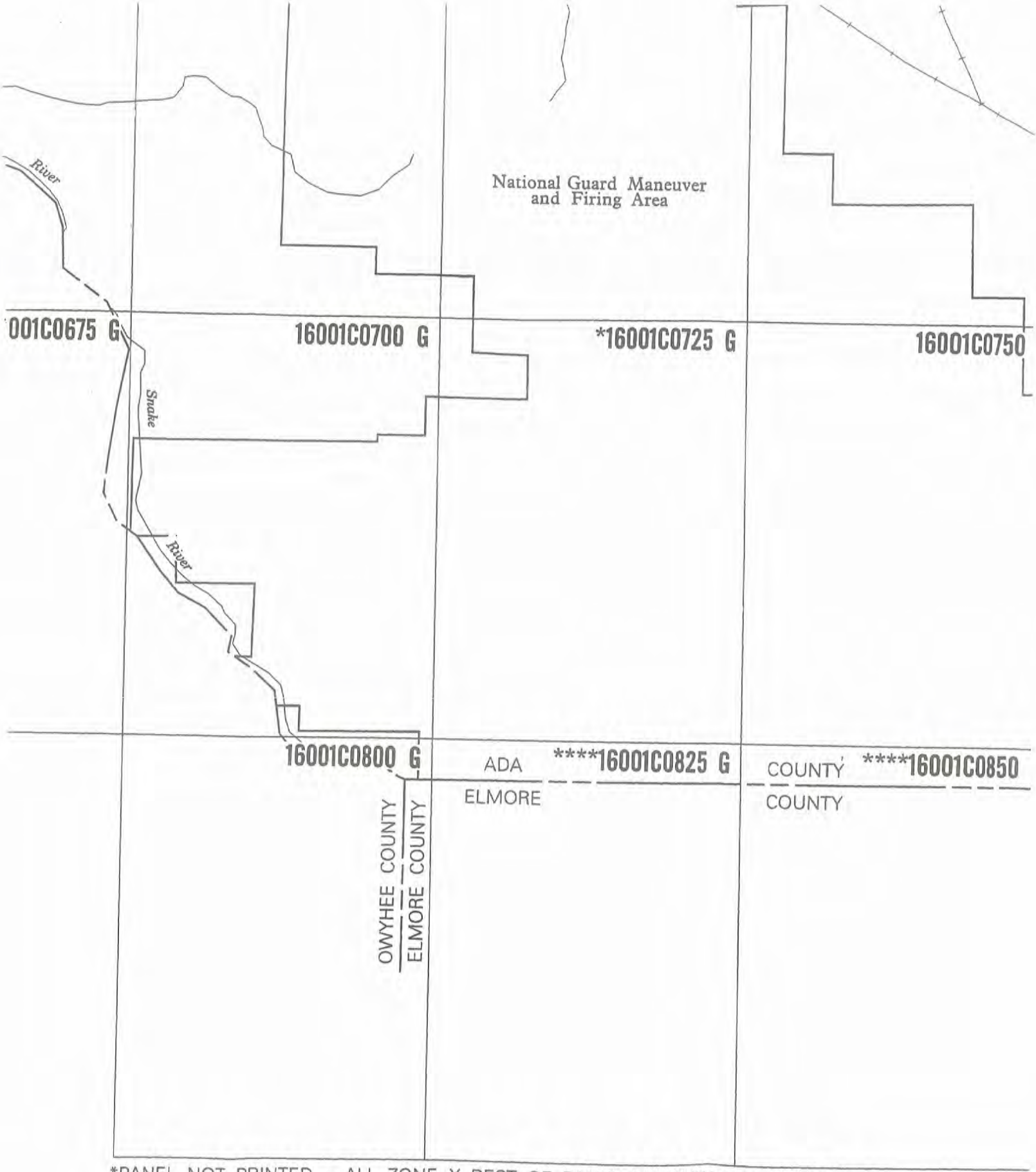
PANELS PRINTED:25,50,75,120,130,134,
135,139,140,141,142,143,144,151,152,153,
154,160,161,162,166,167,169,180,186,187,
188,189,193,231,232,234,250,251,253,254,
258,259,265,267,270,276,277,281,282,
283,284,286,287,291,295,305,315,325,
350,400,425,450,475,500,525,550,575,
600,625,650,675,700,750,775,800

MAP NUMBER
16001C0000

EFFECTIVE DATE:
SEPTEMBER 22, 1999

Federal Emergency Management Agency

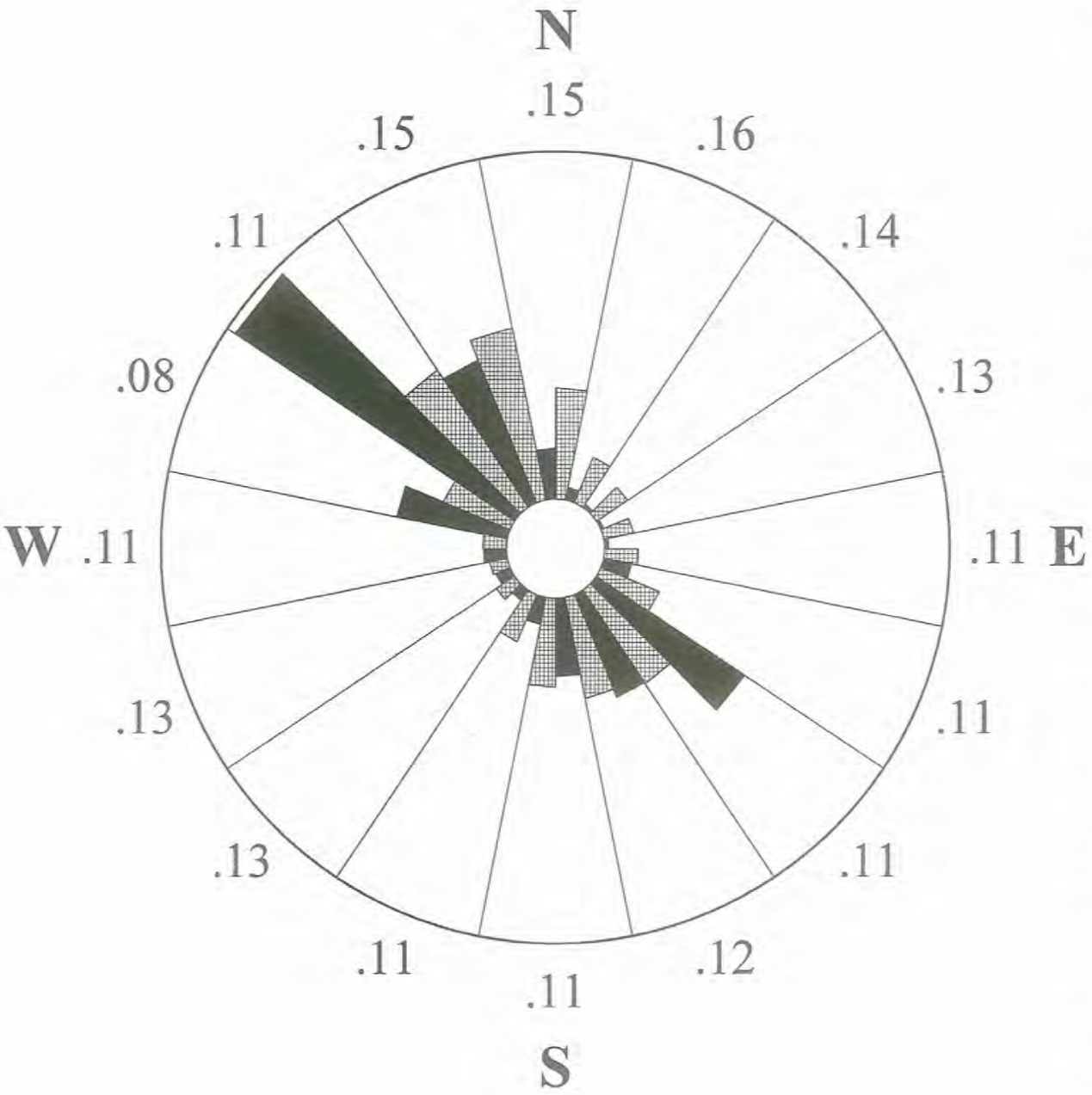

Creek
55
Gulch
Wood
Spring Valley Creek
16001C0151 G
16001C0152 G
16001C0160 G
16001C0180 G
***16001C0185 G
***16001C0225 G
Creek
Canal
Dry
Boise National Park
16001C0153 G
16001C0154 G
City of Eagle
Seaman Gulch
Pierce Gulch
16001C0161 G
16001C0162 G
16001C0166 G
16001C0167 G
16001C0186 G
16001C0187 G
**16001C0191 G
Polecat Gulch
Stuart Gulch
Crane Gulch
BOISE COUNTY
ADA COUNTY
Hulls Gulch
16001C0195 G
**16001C0165 G
**16001C0168 G
16001C0169 G
16001C0188 G
16001C0189 G
16001C0193 G
Veterans Administration Hospital
City of Garden City
69
16001C0251 G
**16001C0252 G
**16001C0260 G
16001C0276 G
16001C0277 G
16001C0281 G
16001C0282 G
16001C0305 G
16001C0325 G
Boise National Park
UNION
30
PACIFIC
Cottonwood Gulch
State Penitentiary
City of Boise
16001C0253 G
16001C0254 G
16001C0258 G
16001C0259 G
**16001C0280 G
16001C0283 G
16001C0284 G
Warm Springs Creek
Squaw Creek
Maynard Gulch
21
Eightmile Creek
Fivemile Creek
SAFETY-KLEEN
Highland Gulch
16001C0265 G
16001C0267 G
16001C0286 G
16001C0287 G
16001C0291 G
16001C0315 G
Boise
Tenmile
ROAD
York
Canal
River
16001C0270 G
**16001C0290 G
16001C0295 G
New
Creek
16001C0425 G
16001C0450 G
16001C0475 G
ROAD
Creek
UNION
Canal
Black Creek Reservoir
PLEASANT
KUNA - MORA
ROAD
Blacks
Creek
North
UNION
Bryans
Run
Indian
Creek
84
30
26
20
PACIFIC
Sand
Indian



*PANEL NOT PRINTED – ALL ZONE X, REST OF PANEL MILITARY RESERVATION
**PANEL NOT PRINTED – ALL ZONE X
***PANEL NOT PRINTED – ALL ZONE X, REST OF PANEL BOISE NATIONAL PARK
****PANEL NOT PRINTED – MILITARY RESERVATION

EXHIBIT C-9

WIND ROSE FOR BOISE IDAHO



1/15/2003 to 1/14/2004

Wind Rose Ch 1, 7

SITE 0208

City of Boise, Kuna site

Site Information:

Project: Idaho State Wind

Location: Kuna, ID, 83634

Elevation: 2800

Anemometer on channel 1:

NRG #40 Maximum Anem

Height: 66

Serial #: None

Vane on channel 7:

NRG #200P Wind Direc

Height: 66

Serial #: None

Outer Numbers are Average TIs for speeds greater than 10 mph

Inner Circle = 0%

Outer Circle = 30%

Percent of Total Wind Energy

Percent of Total Time

EXHIBIT C-10

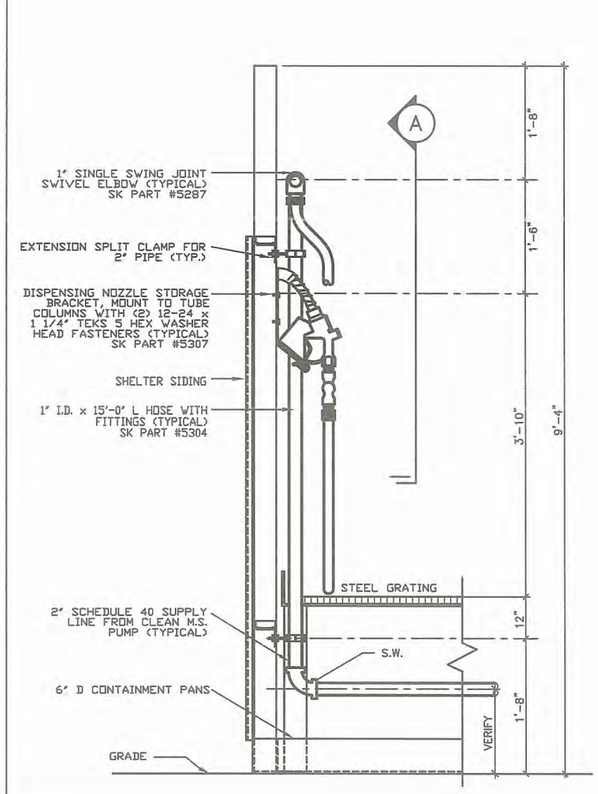
SITE PLAN AND PERMITTED AREAS

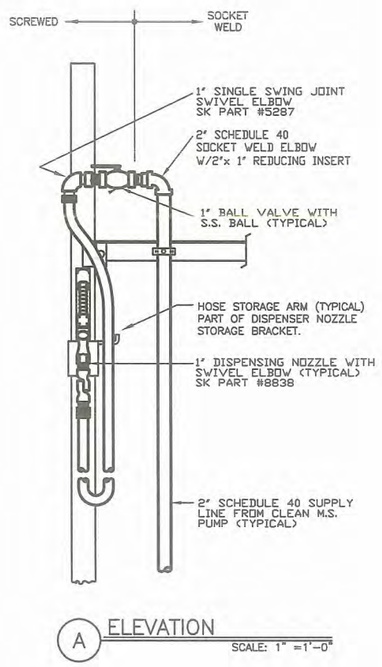
(See C-12)

EXHIBIT C-11

FLOOR PLAN FOR THE CONTAINER STORAGE AREAS AND RETURN/FILL STATION

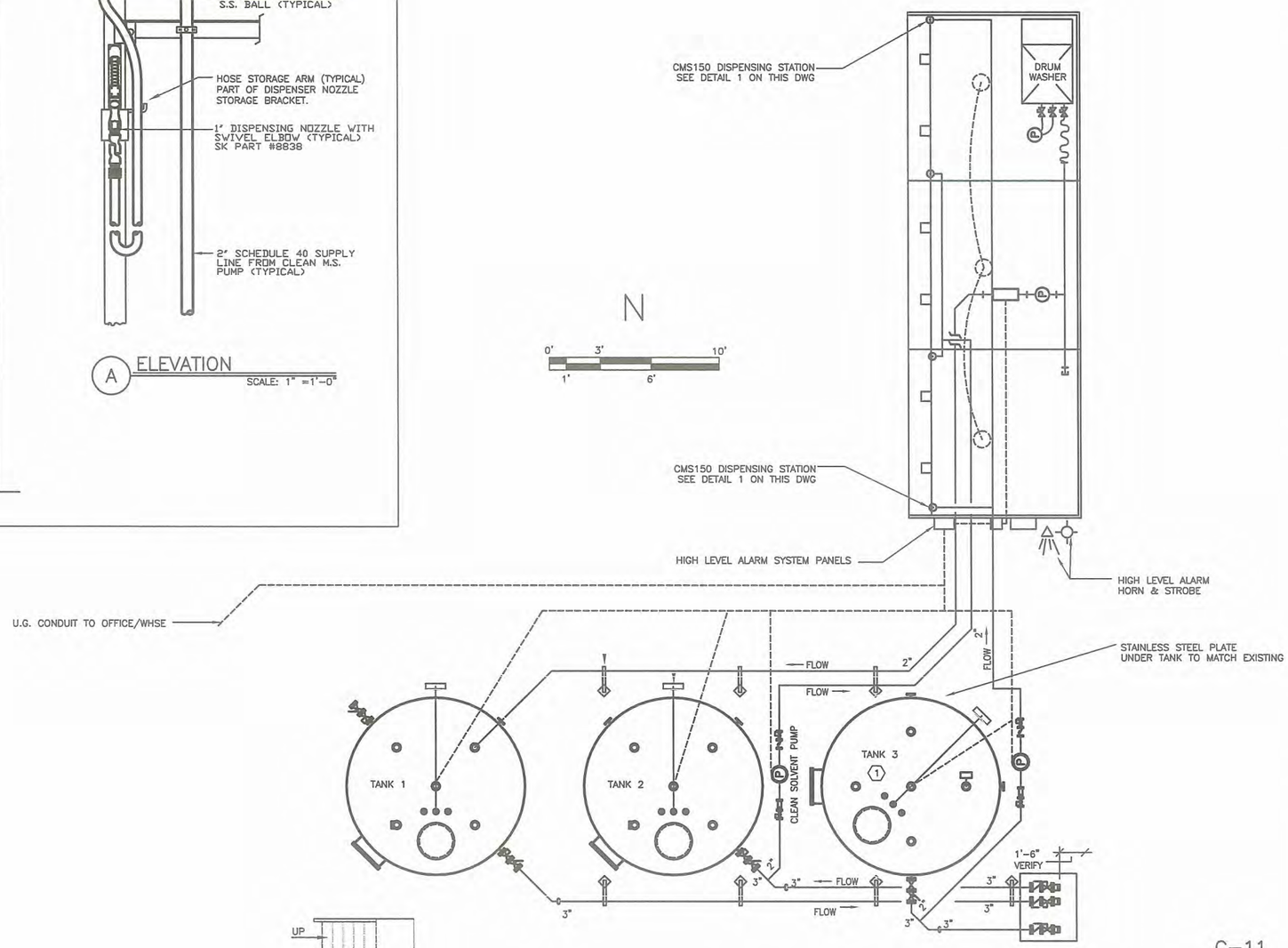
DISPENSING STATION DETAIL 1





A ELEVATION

SCALE: 1" =1'-0"



C-11

GENERAL NOTES

1.) RUN PROCESS PIPE LEVEL FROM TANK. CHANGE ELEVATION ONLY AS REQUIRED.
2.)
3.) PAINT ALL PIPE AND TANKS PER SK SPECS.
4.) ALL PIPING TO BE SUPPORTED EVERY 8'-0" MAXIMUM. CONTRACTOR TO SUPPLY ALL BRACKETS, CLAMPS, ECT. AS REQUIRED FOR SUPPORTING PIPE.
5.) PIPING TO BE PRESSURE TESTED PER SAFETY-KLEEN SPECIFICATIONS.
6.) ALL ITEMS SUPPLIED BY S-K TO BE INSTALLED BY CONTRACTOR.
7.) REFERENCE SITE PLAN DWG TD06001 FOR EQUIPMENT LOCATIONS
8.) ELECTRICALLY GROUND TANK AS REQ'D.

EQUIPMENT SCHEDULE

MARK	DESCRIPTION	QTY.	REMARKS
1	12K TANK	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
2	3" CAM LOCK	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
3	3" LOCKING BALL VALVE	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
4	3" CHECK VALVE	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
5	3" EXTERNAL EMERGENCY VALVE	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
6	3" GATE VALVE	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
7	2" BALL VALVE	2	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
8	2" "Y" STRAINER	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
9	CMS PUMP	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
10	BACK PRESSURE VALVE	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
11	ACCESS CONTAINER	1	EXISTING
12	3" PRESSURE VACUUM BREAKER	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
14	HLA SENSING ELEMENT	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR
15	TANK LEVEL GAUGE	1	SUPPLIED BY S-K INSTALLED BY CONTRACTOR

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	12,000 USG	USED MINERAL SPIRITS	10'-6" F&D BOTTOM TANK
2	12,000 USG	CLEAN 105° MINERAL SPIRITS	10'-6" F&D BOTTOM TANK
3	12,000 USG	CLEAN 150° MINERAL SPIRITS	PROPOSED TANK

PROPRIETARY STATEMENT

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Project Solutions Companies
2005 West Broadway • Suite 210 • Columbia • MO 65203
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

TITLE

TANK FARM AND RETURN/FILL PIPING PLAN

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	RELEASED TO WEY FOR REVIEW	MBH	KJM	WEY	053196
B	FOR PERMIT	JKM	GO	–	031301
C	REMOVE DUMPSTER AND FITTINGS	JEK	GO	–	110205
D	REMOVE C/U VAT AND FITTINGS REVISED FOR PERMIT	JEK	NC	NC	010913

SAFETY-KLEEN SYSTEMS, INC.
2600 N. CENT EXPRESSWAY STE 400 RICHARDSON, TX. 75080
PHONE 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1/4"=1'-0"	MBH				05-31-96

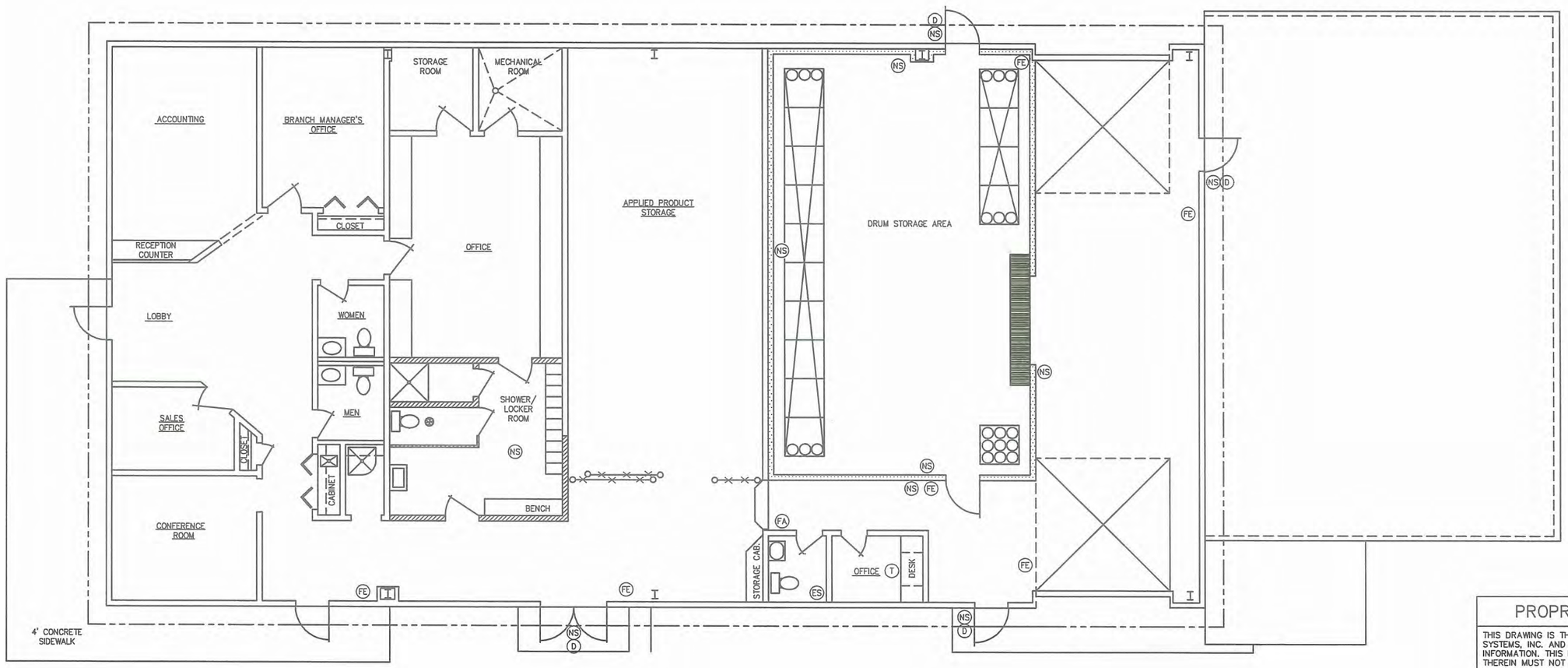
SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
BOISE, ID	7114-4100-301	D

03-13-01

N

0' 3' 10' 25'

6' 15'



LEGEND

- (T) TELEPHONE
- (EW) EYE WASH STATION
- (ES) EYE WASH & SHOWER
- (FE) FIRE EXTINGUISHER
- (FA) FIRST AID STATION
- (D) "DANGER" SIGN
- (NS) "NO SMOKING" SIGN

F-3

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	REVISED FOR PERMIT	JEK	NC	NC	012813
0	NEW ISSUE FOR REVIEW	JEK	DDP	DDP	072808

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Project Solutions Companies

2005 West Broadway • Suite 210 • Columbia • MO 65203
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

TITLE

OFFICE/WAREHOUSE EMERGENCY EQUIPMENT LOCATIONS

SAFETY-KLEEN SYSTEMS, INC.
2600 N. CENT., EXPRESSWAY STE. 400 RICHARDSON, TX. 75080
PHONE 800-669-7540

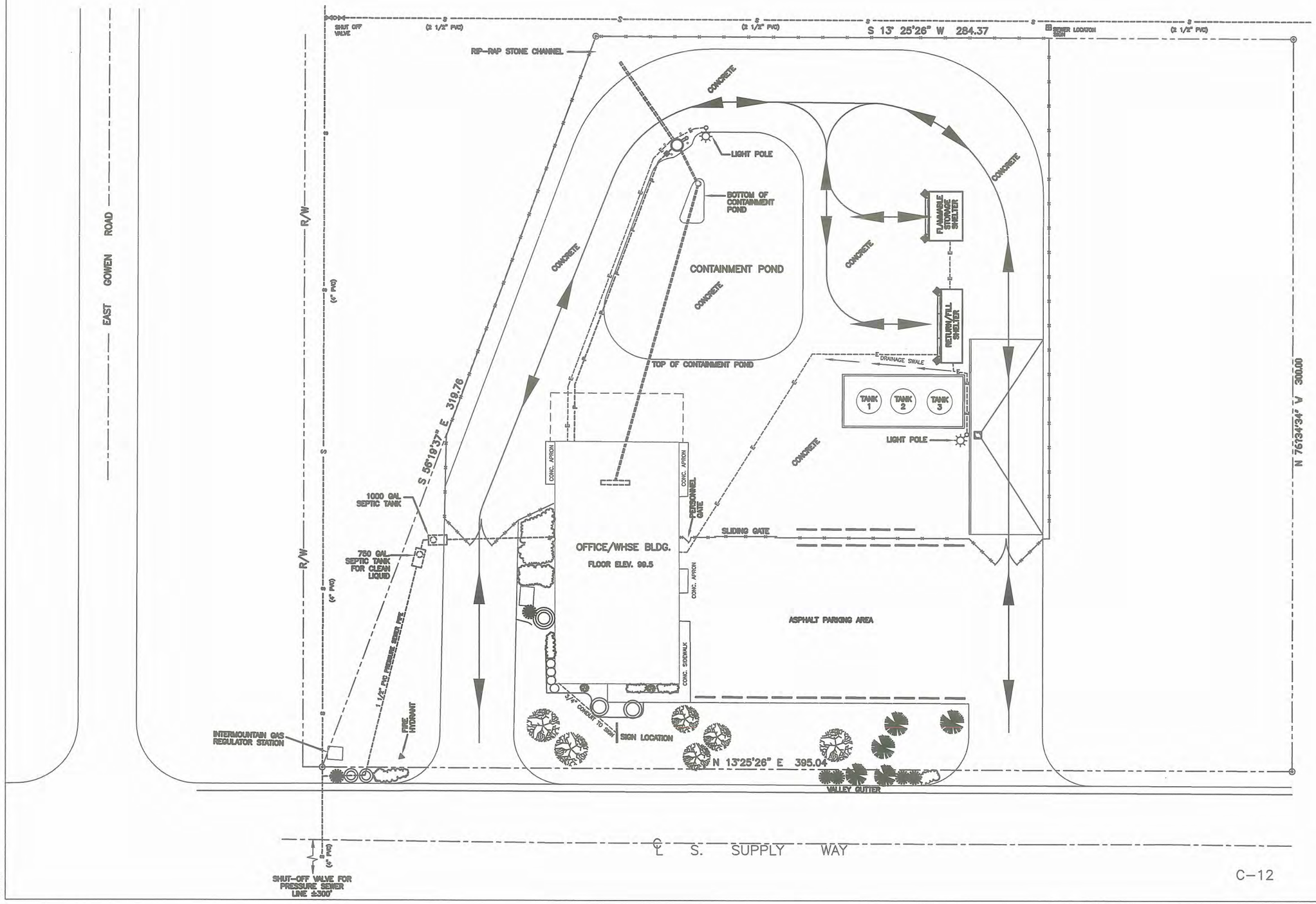
SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
3/16"=1'	JEK	NC	NC	NC	1/28/13

SERVICE CENTER LOCATION	SC-DWG. NO.	REV. NO.
BOISE, ID.	7114-0800-002	A

C.

EXHIBIT C-12

TRAFFIC FLOW PATTERN



120901

N

0' 15' 50'
5' 30' 75'

GENERAL NOTES

TANK LEGEND

TANK NO.	TANK VOLUME	TANK CONTENTS	REMARKS
1	12,000 USG	USED MINERAL SPIRITS	10'-6" F&D BOTTOM TANK
2	12,000 USG	CLEAN 105° MINERAL SPIRITS	10'-6" F&D BOTTOM TANK
3	12,000 USG	CLEAN 150° MINERAL SPIRITS	10'-6" F&D BOTTOM TANK

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	RELEASED TO WEY FOR REVIEW	MBH	KJM	WEY	053199
B	ADDED LANDSCAPPING	MBH	KJM	WEY	053199
C	REVISED FOR PERMIT	JEK	NC	NC	012813

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Project Solutions Companies
2005 West Broadway • Suite 210 • Columbia • MO 65203
• Phone: (573) 443-7100 • Fax: (573) 443-7181 •

TITLE

TRAFFIC FLOW PATTERNS

SAFETY-KLEEN SYSTEMS, INC.
2600 N. CENT. EXPRESSWAY STE. 400 RICHARDSON, TX. 75080
PHONE 800-669-5740

SCALE	BY	CHKD	APPROVED	OPERATIONS	DATE
1"=20'-0"	JKM				05-31-06

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
BOISE, ID	7114-SP00-004	C

3Di, LLC metadata

Job Reference #:	**00-97 (Urban)**				
Job Name:	Ada County				
Job Area/Location:	Ada County, Idaho				
3Di, LLC contact:	Brot Hazell – Project Manager / Steve Duncan – Production Manager				
Address:	3400 West 11th Ave., Eugene OR 97402				
Phone/Fax/E-mail:	(541) 343-8877	(541) 343-8879	bhazell@3dillc.com		
Client:	Community Planning Association of Southwest Idaho (COMPASS)				
Contact person:	Roni Gehring-Pratt				
Address:	Community Planning Association, 413 W. Idaho St., #100, Boise, Idaho, 83702				
Phone/Fax/E-mail:	208-345-5274	208-345-5279	rgpratt@planning.cog.id.us		
Client contract #:	2000-21 (Northern Ada County Digital Orthophoto Project)				
Date of award:	6 March, 2000				
Scope of Job:	Orthophotos with contours covering 351 sections				
Aerial mapping photos:	35 lines,	1311 exp.	6" camera	1" = 600'	B/W
Aerial ortho photos:	24 lines,	351 exp.	12" camera	1" = 840'	Color
Digital Mapping:	DTM capture for 1"=100', 2' contours including edge of roads & drainage				
Orthophotos:	351 scan(s)	1404 tile(s)	1/4 sec size tiles	.5' pixel	Color
GIS:	None				
Hard Copy:	None				
Other:	MrSID compressed orthos				
Scale of Job:	Horizontal:	1" = 100'	Contour Interval:	2'	
Photography source:	Bergman Photographic Service		Flown on:	4/30/00;5/01/00;6/01/00	
Camera info:	1"=600' photography				
camera/lens/F.L./calib	142818	144148	152.889	8-Jun-98	
Photography source:	Bergman Photographic Service		Flown on:	6/01/00;6/02/00	
Camera info:	1"=840' photography				
camera/lens/F.L./calib	144163	144177	305.051	5-Apr-98	
Survey source:	Orion GPS				
Contact name:	John Putnam,				
Address:	1724 23rd Ave, Forest Grove, OR 97116				
Phone/Fax/E-mail:	503-359-1688	503-357-3211			
Control sources:	27 new control points were established. Photography was controlled by airborne GPS with control network extended by aerial triangulation.				
Datum:	Horizontal:	NAD 83 (92)	Vertical:	NAVD 88	
Coordinate system:	State Plane Lambert, Idaho West zone, US Survey feet				
General Accuracy:	This map data has been photogrammetrically compiled to meet National Map Accuracy Standards at 1" = 100' scale with a 2' contour interval. Publication or use at any other scale will void any implied or stipulated accuracy standards.				
Horizontal Accuracy:	Not more than 10% of all well-defined planimetric features are in error by more than .02" at plot scale.				
Vertical Accuracy:	Not more than 10% of all vertical points are in error by more than ½ the contour interval. Dashed contours in areas covered by dense vegetation or shadows may be less than standard accuracy.				
Layer structure:	Layers used are	3DI's standard	layer scheme.		
Symbol set:	Symbols used are	3DI's standard	symbol set.		
Miscellaneous notes:	Certain portions of the job were reflown, thus the flight and exposure numbers represent the planned not the actual numbers. An additional 338 sections (primarily rural) was compiled at 1"=200'. See separate sheet for details.				