

**Keyword Summary:** 

### **eDocument Workflow Data Ingestion Form**

**DERR - Hazardous Waste Permitting** 

Note: All HW Permitting Documents fall under "Permit-Intermediate" doc type.

Secondary ID:	OHD 980 587 364	Stamped date on doc:	/17/2020
Facility Name:	Clean Harbors Recycling Services of	Ohio, LLC	
County:	Licking	CBI/Trade Secret Info (see prote	col below)
Program:	RCRA C – Hazardous Waste	Request contains CBI/TS claim?	No
Permit Type:	Permit to Install & Operate	Was a "public" copy included?	NA
Permit Subtype:	Application & Support	Financial Assurance Info (see pr	otocol
Permit Classification:	Permit Application	Request contains FA policy/account # info?	t No
Permit Purpose:	Class 2 Mod	Contingency Plan Info (see prot	ocol below)
Confidentiality Status:	Public Record for Publication	Request contains facility staff pers/home phone #'s?	No
eDoc system. However, any claims mu 3745-50-30. Permittees must comply v	st be made at the time of application sub	on (CBI) or "trade secret" <u>are not be ingested</u> into imission, as required by both OAC rule 3745-49-03 pove-cited rules, which include, among other thing	and OAC rule
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**Comments** 



Clean Harbors Recycling Services Of Ohio, LLC 581 Milliken Drive SE Hebron, OH 43025

740-929-3532 www.cleanharbors.com

Via Federal Express

April 14, 2020

Jeremy Carroll
Ohio EPA-DHWM
Regulatory and Information Services Section
Lazarus Government Center
50 West Town Street, Suite 700
Columbus, OH 43216-1049
(614) 644-3020

RE: Clean Harbors Recycling Services of Ohio, LLC
OHD 980 587 364
Part B Permit, Class 2 Modification
Additional Container Storage/Less Frequent Fire Extinguisher Inspection

Dear Mr. Carroll:

Clean Harbors Recycling Services of Ohio, LLC (hereinafter, Clean Harbors) is submitting this RCRA Class 2 Permit Modification to increase hazardous waste container storage by less than 25 percent and decrease fire extinguisher inspections from weekly to monthly. These modifications are necessary to provide operational flexibility to the facility and to reduce unnecessary work required by employees.

Also pursuant to OAC 3745-50-51, Appendix, Clean Harbors has determined these changes are a Class 2 Modification. Enclosed you will find the information required by rules <u>3745-50-43</u>, <u>3745-50-44</u>, and <u>3745-50-62</u> of the Administrative Code.

Clean Harbors is submitting notification of the proposed modification and publication as required in OAC 3745-50-51 (D)(2)(b) except that in place of a public meeting, a virtual meeting will be held.

Should you have any questions or comments regarding this matter, please contact me at (630) 854-2549, or at <a href="mailto:laubstedj@cleanharbors.com">laubstedj@cleanharbors.com</a>.

Sincerely,

James R Laubsted

Sr. Environmental Compliance Manager

Enclosures

cc: Melissa Storch, OEPA, CDO

Facility files



#### Part B Class 2 Permit Modification

The following explains and describes changes to be made to the original application and Part B Permit.

The Clean Harbors facility requests the following changes be made to facility description for maximum gallons allowed to be stored in containers and locations identified in Module C of the Part B Permit.

Currently, the maximum of 199,024 gallons of hazardous waste may be stored in the container storage areas identified in Module C:

The Permittee operates five (5) storage areas for the storage of hazardous waste in containers (S01). The maximum amount of container storage allowed in Container Storage Area No. 1 is 158,400 gallons. The maximum amount of container storage allowed in Container Storage Area No. 2B is 6,150 gallons. The maximum amount of container storage allowed in Container Storage Area No. 2E is 8,070 gallons. The maximum amount of container storage allowed in Truck Station No. 1 is 13,200 gallons and the maximum amount of container storage allowed in Truck Station No. 2 is 13,200 gallons.

Clean Harbors is requesting to increase the capacity of Container Storage Area 2B to 13,200 gallons and to allow hazardous waste in Container Storage Area 2D with a capacity of 19,360 gallons. This would increase the maximum of hazardous waste that may be stored in the container storage areas identified in Module C to 225,430 gallons:

The Permittee operates six (6) storage areas for the storage of hazardous waste in containers (S01). The maximum amount of container storage allowed in Container Storage Area No. 1 is 158,400 gallons. The maximum amount of container storage allowed in Container Storage Area No. 2B is 13,200 gallons. The maximum amount of container storage allowed in Container Storage Area No. 2D is 19,360 gallons. The maximum amount of container storage allowed in Container Storage Area No. 2E is 8,070 gallons. The maximum amount of container storage allowed in Truck Station No. 1 is 13,200 gallons and the maximum amount of container storage allowed in Truck Station No. 2 is 13,200 gallons.

In order to meet the containment capacity requirements for Container Storage Areas 2B and 2D, this would also result in changes to the following two current paragraphs:

Container Storage Area No. 2 is constructed of reinforced concrete and is divided into areas 2B, 2C, 2D and 2E. These areas are within an enclosed building, and there is a concrete berm to keep precipitation run-on away from the building. Areas 2C and 2D are to be used for container staging only, and are not permitted for hazardous waste storage. Containers may be staged in areas 2C and 2D for up to 24 hours before they must be moved to a permitted storage area. Area 2B has a secondary containment capacity of 705 gallons, while Area 2E has a secondary containment capacity of 808 gallons.

The waste codes listed in Permit Condition C.3(a) may be stored in containers. Ignitable waste is only permitted to be stored in Container Storage Areas No. 1, No. 2B, and No. 2E. The types and sizes of containers are described in Section 4 of the permit application.



An additional sump will be added to both Container Storage Area 2B and 2D resulting in the following changes:

Container Storage Area No. 2 is constructed of reinforced concrete and is divided into areas 2B, 2C, 2D and 2E. These areas are within an enclosed building, and there is a concrete berm to keep precipitation run-on away from the building. Area 2C is to be used for container staging only, and is not permitted for hazardous waste storage. Containers may be staged in area 2C for up to 24 hours before they must be moved to a permitted storage area. Area 2B has a secondary containment capacity of 1,426 gallons, Area 2D has a secondary containment capacity of 1,995 gallons and Area 2E has a secondary containment capacity of 808 gallons.

The waste codes listed in Permit Condition C.3(a) may be stored in containers. Ignitable waste is only permitted to be stored in Container Storage Areas No. 1, No. 2B, No. 2D, and No. 2E. The types and sizes of containers are described in Section 4 of the permit application.

Section C.1(a) lists the following Container Storage/Quantity Limitation:

The Permittee is authorized to store 199,020 gallons of hazardous waste at any given time in the Permitted Container Storage Areas No. 1, No. 2B, No. 2E, Truck Station No.1 and Truck Station No. 2.

With the above modifications, Clean Harbors requests this be modified to:

The Permittee is authorized to store 225,430 gallons of hazardous waste at any given time in the Permitted Container Storage Areas No. 1, No. 2B, No. 2D, No. 2E, Truck Station No. 1 and Truck Station No. 2.

Additionally, Clean Harbors is requesting to change the container arrangement in Container Storage Areas Nos. 1, 2B and 2E. There is no increase in volume stored for Container Storage Areas Nos. 1 and 2E. The requested container arrangements are shown in Exhibit 23C (Revision A) and Exhibit 24C (Revision 7).

Lastly, Clean Harbors is requesting to change the frequency of the fire extinguisher inspections from weekly to monthly. This modification would not result in any change to the Part B permit.

The following information is required by rules <u>3745-50-44</u>, and <u>3745-50-62</u> of the Administrative Code.

Part A: Section 1 Attachment 1-1 The Part A has been modified to reflect additional hazardous waste container storage increasing the volume from 199,024 gallons to 225,430 gallons. The modified Part A is included.

General Description: Section 2 This modification does not affect any changes to the facility general description.



Chemical and Physical Analyses: Section 3 This modification does not make any changes to the facility Waste Analysis Plan. No new wastes will be managed. no hazardous waste codes added and no changes in analysis requirements will be made with this modification.

Process Information: Section 4 This modification includes changes to the process information. This includes an increase in hazardous waste container storage capacity to 225,430 gallons by increasing the storage capacity in Container Storage Area No. 2B to 13,200 gallons and adding Container Storage Area No. 2D with a storage capacity of 19,360 gallons. Container Storage Area No. 2D will become a storage area from its current use as a staging area only. The additional storage capacity results in a need for increased containment capacity. This will be accomplished by the addition of a new sump in each of Container Storage Areas No. 2B and No. 2D. Additionally, container arrangements are being modified in Container Storage Areas No.1, No. 2B and No. 2E. The modification does not affect the hazardous waste container storage capacity in Container Storage Areas No.1 and No. 2E. The additional sumps for containment capacity and container arrangements are shown in Exhibit 23C (Revision A) and Exhibit 24C (Revision 7).

Table 4-1 has been modified for additional storage capacity for Container Storage Areas No. 2B and No. 2D. Table 4-3 has been modified for additional containment capacity for Container Storage Areas No. 2B and No. 2D.

There are no changes to stormwater management since the container storage is in existing buildings. Tanks and other units are not impacted by this modification.

Groundwater Monitoring: Section 5 This modification makes no changes to the existing groundwater monitoring requirements.

Procedures to Prevent Hazards: Section 6 This modification will decrease the fire extinguisher inspection from weekly to monthly. This change is shown in Table 6-2. This fire extinguisher inspection is required monthly by OSHA and fire codes. Clean Harbors has been doing the inspection weekly, but the inspection data does not indicate a need for weekly inspections. This results in substantial man hours for no increase in safety. Security procedures are not impacted by this modification. There are no changes in equipment used or unloading/loading procedures. Employee personal protective equipment requirements are not affected by this modification.

Contingency Plan: Section 7 This modification makes a minor change to the Contingency Plan by increasing the hazardous waste container storage capacity to 225,430 gallons. The increase in container storage is offset with additional containment capacity to prevent run-off, flooding or contamination of water supplies. Power outages or equipment failure will not be affected by increased container storage capacity. No new wastes will be handled due to this modification. Ignitable wastes are included with the additional hazardous waste storage capacity, but ignitable wastes can be in these areas already. No changes are required.

Training: Section 8 This modification will make minor changes to employee training involving container storage capacities and arrangements.



Closure Plan: Section 9 This modification increases the maximum amount of hazardous waste that can be stored in containers at the facility. Table 9-2 has been modified to show the increased maximum amounts of hazardous waste in containers that could be stored at the facility. This modification increases the closure funding requirement. Attachment 9-1A and Attachment 9-1 CCE Tables have been modified to increase the closure cost estimate.

Corrective Action for Solid Waste Management Units: Section 10 This modification makes no changes to the existing corrective action for solid waste management unit requirements.

Other State and Federal Laws: Section 11 This modification makes no changes to requirements for other State and Federal laws.

Certification: Section 12 A new certification is included with this submittal.

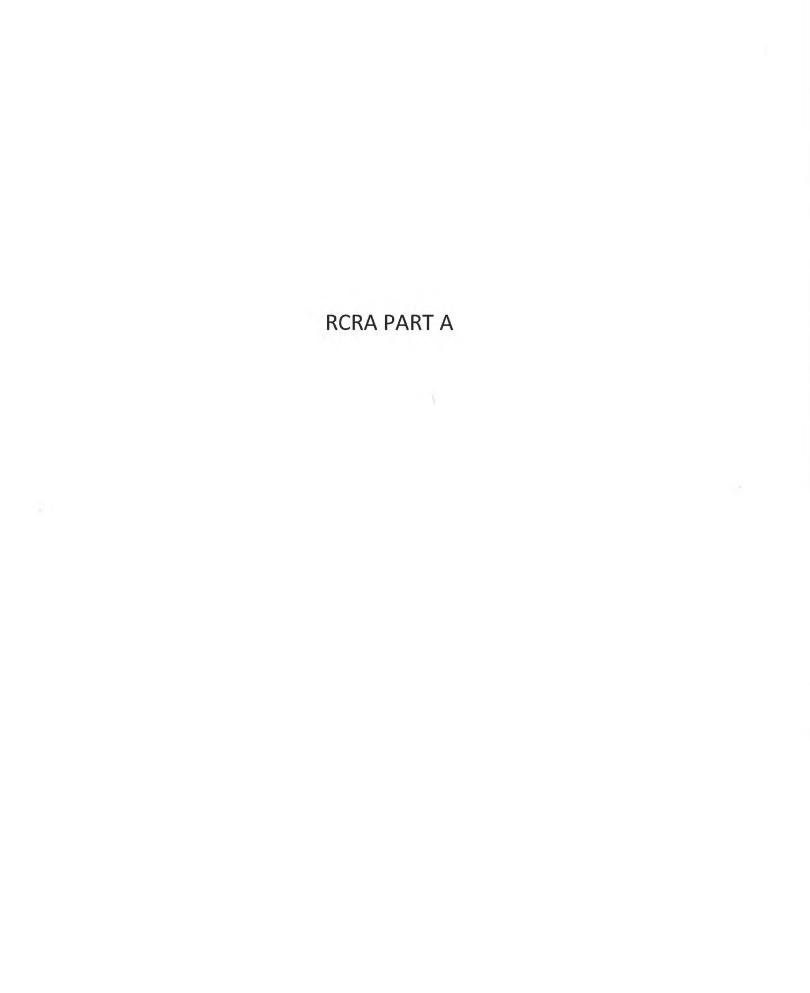
Organic Air Emissions from Process Vents: Section 13 This modification makes no changes to requirements for air emissions from process vents.

Air Emission Standards for Equipment Leaks: Section 14 This modification makes no changes to requirements for air emission standards for equipment leaks.

Air Emission Standards for Tanks, Surface Impoundments and Containers: Section 15 This modification makes no changes to requirements for air emission standards for tanks or surface impoundments. The additional containers proposed must meet the requirements for containers, but there are no changes to this section.

The only change to recordkeeping and recording from this modification is the change in frequency from weekly to monthly for the fire extinguisher inspection.

Clean Harbors believes this modification will present the same minimal level of potential exposure to humans and the environment as other operations at the facility since these activities are already handled at the facility and that the active portion of the facility remains continuously monitored and entry onto controlled.



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# United States Environmental Protection Agency HAZARDOUS WASTE PERMIT PART A FORM



#### 1. Facility Permit Contact

First Name	James	MI R	Last Name Laubsted
Title	Sr. Environmental	Compliance Mgr.	
Email	laubstedj@cleanha	rbors.com	
Phone	630-854-2549	Ext	Fax

#### 2. Facility Permit Contact Mailing Address

Street Address	581 Milliken Drive, SE		
City, Town, or Villa	ege <b>Hebron</b>		
State OH	Country USA	Zip Code <b>43025</b>	

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

3/21/2008	
0/21/2000	

#### 4. Other Environmental Permits

A. Permit Type					В.	Peri	nit l	luml	oer				C. Description
E	Р	0	0	8	3	7	3	7					Title V Air Operating Permit
Р	7	4	2	5	6								Emergency Fire Water Pump General Air
Р	7	4	2	5	7								Emergency Foam Generator General Air
E	D	s	Р		0	Н	-	1	5	0	1	2	Alcohol Distillers Permit - Dept of Treasu
N	2	0	1	6	0	3							POTW Discharge Permit - Village of Hebra
N	4	G	R	0	0	4	9	4	*	E	G		NPDES Stormwater Permit

#### 5. Nature of Business

Solvent recycling and fuel blending for off-site energy recovery. Storage of hazardous waste in tanks and containers in support of recycling/recovery/reclamation and waste transfer operations. Other recycling for non-RCRA wastes.

Lir	ne	A. P	rocess (	Code	B. Process Des	ign Capacity	C. Process Total	5.11.51		
Number					(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name		
0	1	s	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2		
0	2 S 0 2 1,237,500		G	75	TF1, TF2, TF4, TF6					
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6		

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

		A.	ЕРА Н	azard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	s
Line	e No. Waste No. Annual Qty of Waste			Qty of	Measure	Measure (1) Process Codes									(2) Process Description (if code is not entered in 7.D1))		
0	1	D	0	0	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	2	D	0	0	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	3	D	0	0	4	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	4	D	0	0	5	162,129	Т	S	0	1	s	0	2	Т	0	1	0
0	5	D	0	0	6	162,129	Т	s	0	1	S	0	2	Т	0	1	
0	6	D	0	0	7	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	7	D	0	0	8	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	8	D	0	0	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	9	D	0	1	0	162,129	Т	S	0	1	S	0	2	Т	0	1	
1	0	D	0	1	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
1	1	D	0	1	8	162,129	Т	S	0	1	S	0	2	Т	0	1	

#### 8. Map

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

#### 9. Facility Drawing

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

#### 10. Photographs

Comments			

Lir	ne A. Process Code			Code	B. Process Des	ign Capacity	C. Process Total	5.11.51.11		
Number					(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name		
0	1	s	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2		
0			1,237,500	G	75	TF1, TF2, TF4, TF6				
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6		

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

		A.	EPA H	lazard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	s
Line	No. Waste No. Annual Qty of Waste		Qty of	Measure	(1) Process Codes									(2) Process Description (if code is not entered in 7.D1))			
1	2	D	0	1	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
1	3	D	0	2	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
1	4	D	0	2	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
1	5	D	0	2	3	162,129	Т	s	0	1	S	0	2	Т	0	1	
1	6	D	0	2	4	162,129	Т	s	0	1	S	0	2	Т	0	1	
1	7	D	0	2	5	162,129	T	S	0	1	S	0	2	Т	0	1	
1	8	D	0	2	6	162,129	Т	S	0	1	S	0	2	Т	0	1	<b>1</b>
1	9	D	0	2	7	162,129	Т	S	0	1	S	0	2	Т	0	1	
2	0	D	0	2	8	162,129	Т	s	0	1	S	0	2	Т	0	1	4
2	1	D	0	2	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
2	2	D	0	3	0	162,129	Т	S	0	1	S	0	2	Т	0	1	

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Lir	ne	A. P	. Process Code B. Process Design		ign Capacity	C. Process Total	D. Unit Nama			
Num	ber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name		
0	1	S	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2		
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6		
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6		

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		A.	EPA H	lazard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	S
Line	No.		Waste No.			Annual Qty of Waste	Measure			(:	L) Pr	ocess	Code	es			(2) Process Description (if code is not entered in 7.D1))
2	3	D	0	3	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
2	4	D	0	3	3	162,129	Т	S	0	1	S	0	2	Т	0	1	
2	5	D	0	3	4	162,129	Т	S	0	1	S	0	2	Т	0	1	
2	6	D	0	3	5	162,129	Т	S	0	1	S	0	2	Т	0	1	
2	7	D	0	3	6	162,129	Т	S	0	1	S	0	2	Т	0	1	
2	8	D	0	3	7	162,129	T	S	0	1	S	0	2	Т	0	1	
2	9	D	0	3	8	162,129	Т	S	0	1	S	0	2	Т	0	1	
3	0	D	0	3	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
3	1	D	0	4	0	162,129	Т	S	0	1	S	0	2	Т	0	1	
3	2	D	0	4	1	162,129	Т	S	0	1	S	0	2	T	0	1	
3	3	D	0	4	2	162,129	T	S	0	1	S	0	2	Т	0	1	

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Lir	ne	A. Process C		Code	B. Process Des	ign Capacity	C. Process Total	D. Unit Name		
Num	nber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name		
0	1	s	0	1	225,430	G	6	1, 2B, 2D, 2E, T\$1, T\$2		
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6		
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6		

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

		A.	ЕРА Н	azard	ous	B. Estimated	C. Unit of							D.	Pro	cesse	S
Line	No.		Waste No.			Annual Qty of Waste	Measure			(1	L) Pro	ocess	Code	es			(2) Process Description (if code is not entered in 7.D1))
3	4	D	0	4	3	162,129	Т	S	0	1	S	0	2	Т	0	1	
3	5	F	0	0	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
3	6	F	0	0	2	162,129	T	s	0	1	S	0	2	Т	0	1	
3	7	F	0	0	3	162,129	Т	S	0	1	S	0	2	Т	0	1	
3	8	F	0	0	4	162,129	Т	s	0	1	S	0	2	Т	0	1	
3	9	F	0	0	5	162,129	Т	S	0	1	S	0	2	Т	0	1	
4	0	F	0	0	6	162,129	Т	S	0	1	S	0	2	Т	0	1	
4	1	K	0	0	6	162,129	T	S	0	1	S	0	2	Т	0	1	
4	2	K	0	1	6	162,129	T	S	0	1	S	0	2	Т	0	1	
4	3	K	0	2	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
4	4	K	0	3	0	162,129	Т	S	0	1	S	0	2	Т	0	1	

#### 8. Map

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

#### 9. Facility Drawing

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

#### 10. Photographs

Lir			rocess (	Code	B. Process Des	ign Capacity	C. Process Total	D. Unit Name		
Num	ber	202		(1) Amount (2) Unit of Measure		Number of Units	D. Unit Name			
0	1	s	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2		
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6		
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6		

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

		A.	EPA H	lazard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	s
Line	No.		Waste No.			Annual Qty of Waste	Measure	(1) Process Codes									(2) Process Description (if code is not entered in 7.D1))
4	5	K	0	4	8	162,129	Т	S	0	1	S	0	2	T	0	1	
4	6	K	0	4	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
4	7	K	0	5	0	162,129	Т	S	0	1	S	0	2	Т	0	1	
4	8	K	0	5	1	162,129	Т	s	0	1	S	0	2	Т	0	1	
4	9	K	0	5	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
5	0	K	0	6	0	162,129	Т	s	0	1	s	0	2	Т	0	1	
5	1	K	0	8	5	162,129	Т	S	0	1	S	0	2	Т	0	1	
5	2	K	0	8	6	162,129	Т	S	0	1	S	0	2	Т	0	1	
5	3	K	0	8	7	162,129	Т	S	0	1	S	0	2	Т	0	1	
5	4	K	0	9	5	162,129	Т	S	0	1	S	0	2	Т	0	1	
5	5	K	0	9	6	162,129	Т	S	0	1	S	0	2	Т	0	1	

#### 8. Map

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#### 10. Photographs

Lir	ne	A. P	rocess (	Code	B. Process Des	ign Capacity	C. Process Total	D. Unit Name		
Num	nber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name		
0	1	S	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2		
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6		
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6		

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

		A.	EPA H	lazard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	2
Line	No.		Waste No.			Annual Qty of Waste	Measure			(1	l) Pro	ocess	Code	es	-		(2) Process Description (if code is not entered in 7.D1))
5	6	K	1	0	5	162,129	Т	S	0	1	S	0	2	Т	0	1	
5	7	K	1	4	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
5	8	K	1	4	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
5	9	K	1	4	3	162,129	Т	S	0	1	S	0	2	Т	0	1	
6	0	K	1	4	4	162,129	Т	S	0	1	S	0	2	Т	0	1	
6	1	K	1	4	5	162,129	Т	S	0	1	S	0	2	Т	0	1	
6	2	K	1	4	7	162,129	Т	S	0	1	S	0	2	Т	0	1	
6	3	K	1	4	8	162,129	T	S	0	1	S	0	2	Т	0	1	
6	4	U	0	0	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
6	5	U	0	0	3	162,129	Т	S	0	1	S	0	2	Т	0	1	
6	6	U	0	1	9	162,129	T	S	0	1	S	0	2	Т	0	1	

#### 8. Map

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#### 9. Facility Drawing

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#### 10. Photographs

Lir	ne	A. P	rocess (	Code	B. Process Des	ign Capacity	C. Process Total	2 11 2 11
Num	nber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name
0	1	S	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6

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

		A.	EPA H	lazard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	S
Line	No.		Wast	e No.		Annual Qty of Waste	Measure		11	(:	l) Pro	ocess	Code	25			(2) Process Description (if code is not entered in 7.D1))
6	7	U	0	3	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
6	8	U	0	3	7	162,129	Т	S	0	1	S	0	2	Т	0	1	
6	9	U	0	4	4	162,129	Т	S	0	1	S	0	2	Т	0	1	
7	0	U	0	5	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
7	1	U	0	5	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
7	2	U	0	5	5	162,129	Т	S	0	1	S	0	2	Т	0	1	
7	3	U	0	5	6	162,129	Т	S	0	1	S	0	2	Т	0	1	
7	4	U	0	5	7	162,129	Т	S	0	1	S	0	2	Т	0	1	
7	5	U	0	6	8	162,129	Т	S	0	1	S	0	2	Т	0	1	
7	6	U	0	6	9	162,129	Т	s	0	1	S	0	2	Т	0	1	
7	7	U	0	7	0	162,129	Т	S	0	1	S	0	2	Т	0	1	

#### 8. Map

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#### 9. Facility Drawing

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

#### 10. Photographs

0	Н	D	9	8	0	5	8	7	3	6	4
		-									

Lir	ne	A. P	rocess (	Code	B. Process Des	ign Capacity	C. Process Total	2000
Num	nber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name
0	1	s	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6

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

		A.	EPA H	lazard	lous	B. Estimated	C. Unit of							D	. Pro	cesse	S
Line	e No.		Wast	e No.		Annual Measure Qty of (1) Process Codes Waste						(2) Process Description (if code is not entered in 7.D1))					
7	8	U	0	7	1	162,129	T	S	0	1	S	0	2	Т	0	1	
7	9	U	0	7	2	162,129	T	S	0	1	S	0	2	Т	0	1	
8	0	U	0	7	5	162,129	Т	S	0	1	S	0	2	Т	0	1	
8	1	U	0	7	7	162,129	Т	S	0	1	S	0	2	Т	0	1	
8	2	U	0	7	8	162,129	Т	S	0	1	S	0	2	Т	0	1	
8	3	υ	0	7	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
8	4	U	0	8	0	162,129	Т	S	0	1	S	0	2	Т	0	1	
8	5	U	0	8	3	162,129	Т	S	0	1	S	0	2	Т	0	1	
8	6	U	0	8	4	162,129	Т	S	0	1	S	0	2	Т	0	1	
8	7	U	1	0	8	162,129	Т	S	0	1	S	0	2	Т	0	1	
8	8	U	1	1	0	162,129	Т	S	0	1	S	0	2	Τ	0	1	

#### 8. Map

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

#### 9. Facility Drawing

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#### 10. Photographs

omments		

Lir	ne	A. P	rocess (	Code	B. Process Des	ign Capacity	C. Process Total	2
Num	nber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name
0	1	S	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6

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

		A.	EPA H	lazard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	s
Line	No.		Wast	e No.		Annual Qty of Waste	Measure			(:	1) Pr	ocess	Cod	es			(2) Process Description (if code is not entered in 7.D1))
8	9	U	1	1	3	162,129	Т	S	0	1	s	0	2	T	0	1	
9	0	U	1	1	7	162,129	T	S	0	1	s	0	2	Т	0	1	
9	1	U	1	1	8	162,129	Т	S	0	1	S	0	2	Т	0	1	
9	2	U	1	2	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
9	3	U	1	2	4	162,129	Т	S	0	1	S	0	2	Т	0	1	
9	4	U	1	4	0	162,129	Т	S	0	1	s	0	2	Т	0	1	
9	5	U	1	5	4	162,129	T	S	0	1	S	0	2	Т	0	1	
9	6	U	1	5	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
9	7	U	1	6	1	162,129	Т	S	0	1	S	0	2	Т	0	1	
9	8	U	1	6	2	162,129	Т	S	0	1	S	0	2	Т	0	1	
9	9	U	1	6	5	162,129	Т	S	0	1	S	0	2	Т	0	1	

#### 8. Map

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#### 9. Facility Drawing

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#### 10. Photographs

11. Comments		
1.4		
6.74		

Lìr	ne	A. P	rocess (	Code	B. Process Des	ign Capacity	C. Process Total	2
Num	nber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name
0	1	S	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6

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

		A.	EPA H	lazard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	S
Line	No.		Wast	e No.		Annual Qty of Waste	of (1) Process Codes							(2) Process Description (if code is not entered in 7.D1))			
0	0	U	1	6	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	1	U	1	7	1	162,129	Т	S	0	1	s	0	2	Т	0	1	
0	2	U	1	8	8	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	3	U	1	9	1	162,129	Т	s	0	1	s	0	2	Т	0	1	
0	4	U	1	9	6	162,129	Т	s	0	1	S	0	2	Т	0	1	
0	5	U	2	1	0	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	6	U	2	1	1	162,129	Т	S	0	1	S	0	2	Т	0	1	•
0	7	U	2	1	3	162,129	T	S	0	1	S	0	2	Т	0	1	
0	8	U	2	2	0	162,129	Т	S	0	1	S	0	2	Т	0	1	
0	9	U	2	2	6	162,129	Т	S	0	1	S	0	2	Т	0	1	
1	0	U	2	2	7	162,129	Т	S	0	1	S	0	2	Т	0	1	

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Lir	ne	A. P	rocess (	Code	B. Process Des	ign Capacity	C. Process Total	
Num	nber				(1) Amount	(2) Unit of Measure	Number of Units	D. Unit Name
0	1	S	0	1	225,430	G	6	1, 2B, 2D, 2E, TS1, TS2
0	2	S	0	2	1,237,500	G	75	TF1, TF2, TF4, TF6
0	3	Т	0	1	220,000	U	14	TF1, TF2, TF4, TF6

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

		A.	EPA H	lazard	ous	B. Estimated	C. Unit of							D	. Pro	cesse	S
Line	No.		Wast	e No.		Annual Qty of Waste	Measure	(1) Process Codes								(2) Process Description (if code is not entered in 7.D1)	
1	1	U	2	2	8	162,129	Т	S	0	1	S	0	2	Т	0	1	
1	2	U	2	3	9	162,129	Т	S	0	1	S	0	2	Т	0	1	
											-						

#### 8. Map

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#### 9. Facility Drawing

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#### 10. Photographs

# United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM



						g an E ictivit		uml	ber fo	r an or	n-goi	ng regi	lated	act	ivity that	will c	ontinu	ue for a	peri	od of
	] !	Subm	itting	as a	comp	onent	of the	Haz	ardo	us Was	te Re	port 1	or		(R	eporti	ng Yea	ar)		
			ha	azard	ous w	aste,	or > 10	0 kg	g of a		zard	ous wa			acute haz leanup i					
	1	Notify	ing th	nat re	gulat	ed ac	tivity is	no	longe	r occur	ring	at this	Site							
		Obtai	ning c	or upo	dating	an E	PA ID n	uml	oer fo	r condi	uctin	g Elect	ronic	Ma	nifest Bro	oker a	ctivitie	es		
<b>√</b>	9	Subm	itting	a nev	v or r	evise	Part A	Fo	rm											
lame															- 1					
Clea	an H	arbo	rs Re	ecycl	ling S	Servi	ces of	Oh	io, L	LC										
ocati	on A	ddres	S																	
		ddres dress		5	581 N	lillike	n Driv	/e, \$	SE											
Stree	et Ad				581 M Hebro		en Driv	/e, \$	SE						Count	y Li	icking	g		
Stree	et Ad Tow	dress				on	en Driv								Count Zip Co			g		
Stree	Tow	dress n, or '	Villag			on											3025		ocatio	on Addr
Stree City, State	Tow O  A  O  A  A  A  A	dress n, or ' H	Villag			on											3025		ocatio	on Addr
Stree City, State	Tow  O  Addet Addet Addet	dress n, or ' H dress dress	Villag	e <b> </b> -		on											3025		catio	on Addr
Stree City, State Mailin	Tow P O ng Ad et Ado	dress n, or ' H dress dress	Villag	e <b> </b> -		Cou										de <b>4</b> 3	3025		ocatio	on Addr
Stree City, State Mailin Stree City, State	Tow Pe O ng Ad et Add	dress n, or ' H dress dress	Villag	e <b> </b> -		Cou	untry (								Zip Co	de <b>4</b> 3	3025		ocatio	on Addr
Stree City, State Mailin Stree City, State and T	Town Add Town Town Town	dress n, or '  H  dress dress n, or \	Villag	e <b> -</b>	Hebro	Cou	ntry (			ederal		Trik	al		Zip Co	de <b>43</b>	3025	ne as Lo	ocatio	
Stree City, State Mailin Stree City, State and T	Tow Pe O ng Ad et Add	dress n, or '  H  dress dress n, or \	Villag	e <b> </b> -	Hebro	Cou	untry (			ederal		Trib	al		Zip Co	de <b>43</b>	3025		ocatio	on Addr
Stree City, State Mailin Stree City, State and T	Town Add Town Town Town Town	dress n, or \ H dress dress dress	Villag	e J	/	Cou	ntry (	JSA	\ Fe		[			east	Zip Co	de 43	3025	ne as Lo	catio	
Stree City, State Mailin Stree City, State and T	Town Add Town Town Town Town Town Town Town Town	dress n, or \ H dress dress n, or \	Villag	e J	/ /	Cou	ntry (	JSA	\ Fe		for tl			east	Zip Coo	de 43	3025	ne as Lo	ocatio	

Contact Information		Same as Location Addr
First Name James	MI R	Last Name Laubsted
Title Sr. Envir	ronmental Compliance Mgr.	
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email laubstedj@cleanharbo	rs.com	
Phone <b>630-854-2549</b>	Ext	Fax
A. Name of Site's Legal Owner  Full Name  Clean Harbors Recycling Serv	vices of Ohio, LLC	Date Became Owner (mm/dd/yyyy) 3/21/2008
	istrict Federal Tribal	Municipal State Other
City, Town, or Village Norwell		
Chaha BAA	1	75- 6- 4- 00004
State MA	Country USA	Zip Code <b>02061</b>
Email	Country USA	Zip Code 02061
Email Phone 781-792-5000	Ext	Zip Code   02061
Email		Fax
Email Phone 781-792-5000 Comments	Ext	Fax  Same as Location Add
Email  Phone 781-792-5000  Comments  B. Name of Site's Legal Operator  Full Name  Clean Harbors Recycling Serv  Operator Type  Private County D	Ext	Fax  Same as Location Add  Date Became Operator (mm/dd/yyy 3/21/2008
Email  Phone 781-792-5000  Comments  B. Name of Site's Legal Operator  Full Name  Clean Harbors Recycling Serv  Operator Type  Private County D  Street Address	Ext	Fax  Same as Location Add  Date Became Operator (mm/dd/yyy 3/21/2008
Email  Phone 781-792-5000  Comments  B. Name of Site's Legal Operator  Full Name  Clean Harbors Recycling Serv  Operator Type  Private County D	vices of Chicago, LLC	Fax  Same as Location Add  Date Became Operator (mm/dd/yyy 3/21/2008  Municipal State Other
Email  Phone 781-792-5000  Comments  B. Name of Site's Legal Operator  Full Name Clean Harbors Recycling Serv Operator Type Private County D  Street Address  City, Town, or Village  State	Ext	Fax  Same as Location Add  Date Became Operator (mm/dd/yyy 3/21/2008
Email  Phone 781-792-5000  Comments  B. Name of Site's Legal Operator  Full Name  Clean Harbors Recycling Serv  Operator Type  Private County D  Street Address  City, Town, or Village	vices of Chicago, LLC	Fax  Same as Location Add  Date Became Operator (mm/dd/yyy 3/21/2008  Municipal State Other

EPA ID Number	0	Н	D	9	8	0	5	8	7	3	6	4

OMB# 2050-0024; Expires 05/31/2020

#### 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

V	Пи	1. Ger	nerator of H	lazardous Waste—If "Yes", mark only one of the following—a, b, c
		<b>V</b>	a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
			b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
			c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
□\r	N	proces	ses). If "Ye	nerator (generates from a short-term or one-time event and not from on-going s", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate nerator of Hazardous Waste in Item 10.A.1 above.</i>
V	N	3. Trea	ater, Storer se activitie:	or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required s.
V	N	4. Rece	eives Hazar	dous Waste from Off-site
VY	N	5 Recy	cler of Haza	ardous Waste
		<b>V</b>	a. Recycle	r who stores prior to recycling
			b. Recycle	r who does not store prior to recycling
П	√N	6. Exer	npt Boiler a	nd/or Industrial Furnace—If "Yes", mark all that apply.
			a. Small Q	uantity On-site Burner Exemption
			b. Smeltin	g, Melting, and Refining Furnace Exemption

D001	D002	D004	D005	D006	D007	D008
D009	D010	D011	D018	D019	D021	D022
D023	D024	D025	D026	D027	D028	D029
D030	D032	D033	D034	D035	D036	D037
D038	D039	D040	D041	D042	D043	F001

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes. Please list the waste codes of the State hazardou	ıs
wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more	9
spaces are needed.	

#### 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

N IV	1. Ger	nerator of H	Hazardous Waste—If "Yes", mark only one of the following—a, b, c				
		a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.				
		b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.				
		c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.				
□Y VN	proces	ses). If "Ye	enerator (generates from a short-term or one-time event and not from on-going es", provide an explanation in the Comments section. Note: If "Yes", you MUST indicate nerator of Hazardous Waste in Item 10.A.1 above.				
VY N	3. Trea	ater, Storer se activitie	or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required s.				
VY UN	4. Rece	eives Hazar	dous Waste from Off-site				
VY DN	5 Recy	cler of Haza	ardous Waste				
	<b>V</b>	a. Recycle	er who stores prior to recycling				
		b. Recycle	er who does not store prior to recycling				
Y VN	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.						
		a. Small C	Quantity On-site Burner Exemption				
	П	b. Smeltin	ng, Melting, and Refining Furnace Exemption				

F002	F003	F004	F005	F006	K006	K016
K022	K030	K048	K049	K050	K051	K052
K060	K085	K086	K087	K095	K096	K105
K141	K142	K143	K144	K145	K147	K148
U002	U003	U019	U031	U037	U044	U051

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

#### 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

VY N	1. Ger	erator of F	lazardous Waste—If "Yes", mark only one of the following—a, b, c
	<b>V</b>	a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
		b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
		c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
□y Vn	proces	ses). If "Ye	enerator (generates from a short-term or one-time event and not from on-going es", provide an explanation in the Comments section. Note: If "Yes", you MUST indicate nerator of Hazardous Waste in Item 10.A.1 above.
VY □N		ater, Storer se activitie	or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required s.
VY UN	4. Rece	ives Hazar	dous Waste from Off-site
VY N	5 Recy	cler of Haza	ardous Waste
		a. Recycle	er who stores prior to recycling
	Ī	b. Recycle	er who does not store prior to recycling
Y VN	6. Exer	npt Boiler a	and/or Industrial Furnace—If "Yes", mark all that apply.
		a. Small C	Quantity On-site Burner Exemption
	Ħ	b. Smeltin	ng, Melting, and Refining Furnace Exemption

U052	U055	U056	U057	U068	U069	U070
U071	U072	U075	U077	U078	U079	U080
U083	U084	U108	U110	U113	U117	U118
U121	U124	U140	U154	U159	U161	U162
U165	U169	U171	U188	U191	U196	U210

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

#### 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

V	□N	1. Ger	nerator of H	lazardous Waste—If "Yes", mark only one of the following—a, b, c
		<b>V</b>	a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
			b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
			c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
۳	✓N	proces	ses). If "Ye	enerator (generates from a short-term or one-time event and not from on-going ss", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate nerator of Hazardous Waste in Item 10.A.1 above.</i>
V	N	3. Trea	ater, Storer se activitie	or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required s.
V	N	4. Rece	eives Hazar	dous Waste from Off-site
√Y	N	5 Recy	cler of Haza	ardous Waste
		<b>V</b>	a. Recycle	er who stores prior to recycling
			b. Recycle	er who does not store prior to recycling
Υ	N	6. Exer	npt Boiler a	and/or Industrial Furnace—If "Yes", mark all that apply.
			a. Small C	Quantity On-site Burner Exemption
			b. Smeltin	ng, Melting, and Refining Furnace Exemption

U211	U213	U220	U226	U227	U228	U239

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

YVN	1. Tra	ansporter of Hazardous Waste—If "Yes", mark all that apply.
		a. Transporter
		b. Transfer Facility (at your site)
Y V N	2. U	nderground Injection Control
VY UN	3. U	nited States Importer of Hazardous Waste
□Y ☑N	4. Re	ecognized Trader—If "Yes", mark all that apply.
		a. Importer
		b. Exporter
□ Y ☑ N	5. In that	nporter/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If "Yes", mapply.
		a. Importer
		b. Exporter
		ge Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If "Yes" mark all the Note: Refer to your State regulations to determine what is regulated.  a. Batteries
		b. Pesticides
	A	or restricted
		c. Mercury containing equipment
	V	
	✓ ✓	c. Mercury containing equipment
	✓ ✓	c. Mercury containing equipment d. Lamps
	✓ ✓ □	c. Mercury containing equipment d. Lamps e. Other (specify)
		c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for this
	2. De activity	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for this.
C. Used Oil A	2. De activitie	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for thing.
	2. De activitie	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for thing.  s d Oil Transporter—If "Yes", mark all that apply.
C. Used Oil A	2. De activitie	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for this.  s d Oil Transporter—If "Yes", mark all that apply. a. Transporter
C. Used Oil A	2. De activitie	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for thing.  s d Oil Transporter—If "Yes", mark all that apply. a. Transporter b. Transfer Facility (at your site)
C. Used Oil A	2. De activitie	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for thiny.  s d Oil Transporter—If "Yes", mark all that apply. a. Transporter
C. Used Oil A	2. De activitie	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for thing.  s d Oil Transporter—If "Yes", mark all that apply. a. Transporter b. Transfer Facility (at your site)
C. Used Oil A	2. De activitie	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for thing.  s d Oil Transporter—If "Yes", mark all that apply. a. Transporter b. Transfer Facility (at your site) d Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
C. Used Oil A	2. De activitie 1. Use	c. Mercury containing equipment d. Lamps e. Other (specify) f. Other (specify) g. Other (specify) estination Facility for Universal Waste Note: A hazardous waste permit may be required for thiny.  s d Oil Transporter—If "Yes", mark all that apply.  a. Transporter b. Transfer Facility (at your site) d Oil Processor and/or Re-refiner—If "Yes", mark all that apply.  a. Processor

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OMB# 2050-0024; Expires 05/31/2020

	ν	"Yes"	', ma	ark o		ie. N						ageme tructio								
			a.	Heal	thcar	e Fac	lity													
			b.	Reve	rse D	istrib	utor													
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<b>igible A</b> c							ries—	-Notifi	cation	for op	oting i	nto or '	with	draw	ing fr	om m	anagi	ing lab	orato	ry haza
Y [	N	wast	pting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous tes in laboratories— If "Yes", mark all that apply. Note: See the item-by-item instructions for definis of types of eligible academic entities.																	
			1.	Colle	ge or	Univ	ersity													
			2.	Teac	hing I	Hospi	tal tha	at is ov	vned b	y or h	as a f	ormal v	writ	en a	ffiliati	on wit	th a c	ollege	or uni	versity
			3.	Non-	profit	Insti	tute t	hat is	owned	l by or	has a	forma	l wr	itten	affilia	tion v	vith a	colle	ge or u	niversi
TY F	√ N	B. W	thd	rawin	g froi	n 40	CFR 2	62 Sub	part K	for th	ne ma	nagem	ent	of ha	zardo	us wa	stes i	n labo	ratori	es.
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□Y □	tion of	LQG S	Site Gite (	Closu	ure for	o <b>r a C</b> o a Cer mulat	entral atral A	l <b>Accur</b>	nulation	on Area	ea (CA (CAA)	AA) (op or Ent				re Fa	cility	(requi	ired)	

Notification	T	
∏Y ØN	Are you notifying under 40 CFR 260.42 that you will be hazardous secondary material under 40 CFR 260.30, a must fill out the Addendum to the Site Identification	40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you
lectronic Ma	anifest Broker	
	Are you notifying as a person, as defined in 40 CFR 26 tem to obtain, complete, and transmit an electronic rardous waste generator?	0.10, electing to use the EPA electronic manifest s nanifest under a contractual relationship with a ha
Comments (	nclude item number for each comment)	
	Landformula and the flow that this degree on and	all attachments were prepared under my direction
vision in acco	I certify under penalty of law that this document and independent of the person or persons who managed to assure that qualified	personnel properly gather and evaluate the inform
vision in acco mitted. Based of the Inform	rdance with a system designed to assure that qualified don my inquiry of the person or persons who manage t ation, the information submitted is, to the best of my k	personnel properly gather and evaluate the inforn the system, or those persons directly responsible for nowledge and belief, true, accurate, and complete
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rision in accomitted. Based g the Informate that there wing violatio 270.10(b) and the control of the control o	ordance with a system designed to assure that qualified don my inquiry of the person or persons who manage to ation, the information submitted is, to the best of my ker er are significant penalties for submitting false informations. Note: For the RCRA Hazardous Waste Part A perm	personnel properly gather and evaluate the inforn the system, or those persons directly responsible for nowledge and belief, true, accurate, and complete on, including the possibility of fines and imprisonm
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RCRA PART B Application
Section 4 Modified Pages

#### **SECTION 4**

#### PROCESS INFORMATION

The information provided in this section is submitted in accordance with the requirements of OAC 3745-66-70 through 992. This section contains information about storage in tanks and in container storage areas, truck station areas, and processing. Process units used for waste recycling and reclamation operations at the Hebron Recycle Center are not subject to RCRA regulation, in accordance with OAC 3745-51-06.

## 4.1 GENERAL DESCRIPTION OF STORAGE AREAS AND ON-SITE OPERATIONS

#### 4.1.1 Storage Areas and Truck Stations

Storage and processing operations at the Hebron facility take place in container storage areas and tank farms. Loading and unloading operations are performed at the truck stations. Exhibit 2 shows the location of the different units at the facility. This exhibit demonstrates the 50 foot set back requirements for these units. The following is a general description of those units.

#### **Container Storage Areas**

The Hebron facility has capacity to store 225,430 gallons of containerized hazardous wastes in Container Storage Areas No. 1, 2B, 2D and 2E and Truck Stations 1 and 2. The capacity of Container Storage Area No. 1 is 158,400 gallons of hazardous wastes. Container Storage Area No. 2 has a total storage capacity of 40,630 gallons of hazardous wastes. Truck Stations Nos. 1 and 2 have alternate use as container storage areas with a storage capacity of 13,200 gallons of hazardous wastes each. The truck stations will still be used as truck stations, but sections can be segregated with booms or other devices for container storage. Table 4-1 in Attachment 4-6 summarizes the storage capacities for the different container storage areas.

#### **Tank Farms**

There are five tank farms at the Hebron facility, four of which (Tank Farms Nos. 1, 2, 4 and 6) are used for storage of hazardous wastes. The total capacity for storage of hazardous wastes is 1,237,500 gallons in 74 tanks and Solids Storage Bin #2. The tank schedule is presented in Tables 4-2 in Attachment 4-7.

Tank Farm No. 1, typically used for NFPA flammable waste solvents, has a storage capacity of 595,000 gallons of hazardous wastes in 30 tanks. Tank Farm No. 2, typically used for chlorinated waste solvents (NFPA combustible waste solvents), has a storage capacity of 525,000 gallons of hazardous wastes in 37 tanks. Tank Farm No. 3, typically used for chlorinated product storage, does not contain any permitted hazardous waste storage tanks and is not used for storage of hazardous wastes. Tank Farm No. 4, used for NFPA Combustible waste storage, has a storage capacity of 60,000 gallons in 4 tanks. Finally, Tank Farm No. 6, used to store still bottoms oil and waste solvents (NFPA flammable and combustible) for fuels blending, has a storage capacity of 57,500 gallons of hazardous wastes in 3 tanks and Solids Storage Bin #2. See Exhibits 26 through 35 and 57 for construction plans and details

used for industrial solvent waste materials are 55-gallon containers. All waste is compatible with the containers in which it is stored.

All containers used for storage of hazardous wastes at the Clean Harbors Hebron facility meet DOT regulations in accordance with 49 CFR 178 and RCRA regulations for marking and labeling. All containers used to store hazardous waste at the facility, including any containers that are reused for on-site generated materials, will be inspected to ensure that they are in good condition (e.g., no severe rusting or apparent structural defects). If any container is not in good condition or begins to leak, the contents will be transferred to a container that is in good condition in accordance with OAC 3745-55-71.

#### 4.2.2 Container Management Practices [OAC 3745-55-70 to 74 and 3745-54-35]

Container management generally falls into one of three categories: unloading, storage, and emptying. When a shipment of containers is received at the facility, it is unloaded from the truck trailer using a lift truck fitted with drum handling or pallet handling attachments. Containers are spread out in the drum staging area, areas 2D and 2C as shown on Exhibit 24C, so that individual drums are accessible for inspection and sampling. Containers are counted to ensure agreement with the manifest or shipping papers and inspected to ensure that the containers are structurally sound and are labeled in compliance with RCRA and other applicable regulations. The containers will be sampled and/or inspected using the procedures outlined in the Waste Analysis Plan (Appendix 3-1 of Section 3 of this permit application), to confirm that the wastes are suited for storage and processing at the Hebron Recycle Center. Containers may be staged in area 2C for up to 24 hours before they must be moved to a permitted storage area. Area 2C is ONLY used as a staging area.

After the waste analyses have been completed, containers are moved to a permitted container storage area designated by the facility management. Containers of waste are stored to await subsequent emptying to the process units or to a storage or blending tank. Containers are transported within the facility by trained personnel using lift trucks with drum handling or pallet handling attachments.

Containers in storage are kept closed with all head bungs secure, preventing evaporation of volatile materials from the containers (the solvents received at the facility are valuable product, and therefore, Clean Harbors minimizes opportunities for loss). Containers are stored upright, generally on pallets, but may be stored directly on the concrete pad, depending upon how they are received. Exhibits 23C, 24C, 40C, and 41D present arrangements of drums in Container Storage Areas No. 1 and 2 and in Truck Stations No. 1 and 2, respectively.

Containers in Storage Area 1 currently are stored on pallets and are stacked up to 12'0". In order to ensure compliance with this standard, a mark has been placed on building columns or walls in Storage Area 1 at the 12'0" elevation. Containers in storage areas 2B, 2D and 2E are stored on pallets and are stacked up to a maximum height of two 55-gallon drums. The minimum aisle space between rows of drums in the container storage areas is typically two feet. Containers are stored at least three feet from the edge of any dike not protected by a side wall. Additionally, clearance of at least three feet is maintained around all columns in the container storage areas. This arrangement allows unobstructed movement of personnel to ensure that all drums can be visually inspected. Two feet of aisle space will be maintained from the wall to the first pallet. The aisle space maintained ensures unobstructed movement of personnel for fire fighting purposes. The types of materials stored in each row are identified in the operations log maintained at the facility. Labels on the containers identify the contents, the accumulation date, and the contained wastes, associated hazards. Ignitable wastes may be stored in container storage areas 1, 2B, 2D and 2E ONLY. Smoking is prohibited in the facility, which is posted with "No

Previous knowledge of the waste streams indicates that the core waste streams are compatible. However, certain proposed industrial waste streams waste codes may be deemed incompatible according to USEPA guidance (A Method for Determining the Compatibility of Hazardous Wastes, EPA-600 2-80-076, April 1980). Therefore, based on discussions with Ohio EPA, Clean Harbors will assume that the following waste codes are incompatible with other waste streams unless there is knowledge which demonstrates otherwise. Demonstrated knowledge will include: determination by the above mentioned guidance document, or receipt of the waste which is already commingled, or testing the waste stream. Testing of the waste stream will be conducted and documented, for each material profile evaluation statement (refer to example in Attachment 3 in Appendix 3-1), for each waste stream which can be stored without segregation.

Segregation of these waste streams will include, but is not limited to:

1. Separation, dike, berm,

2. Isolation of the waste with portable dike, berm. Isolation will follow the guidelines in section 6 for two foot aisle space, etc.

Container Storage Area No. 1 (see Exhibits 23A through 23C) is constructed of a reinforced concrete pad with twelve inch high curbs at the east and west ends, and variable height curbs along the north and south ends (six inch minimum in the middle and increasing as the elevation of the pad decreases). The concrete pad is reinforced with 6 x 6 No. 4 rods with a one sixteenth-inch per foot slope to direct the flow of any leakage or spillage to sumps located at the east and west ends of Container Storage Area No. 1. Each sump is twenty-four inches in diameter by two feet deep and has a capacity of 47 gallons.

Container Storage Area No. 2 (see Exhibits 24A through 24C) is constructed of reinforced concrete. Secondary containment capacity calculation for Storage Areas 2B and 2D was determined by flooding the areas with water. Clean Harbors temporarily removed all containers and non-fixed equipment from Container Storage Areas No. 2B and 2D. The containment area was flooded with water using a hose connected to a meter. Water was added until it overflowed the containment area. Clean Harbors decided to use this procedure to determine the secondary containment capacity for Storage Areas 2B and 2D because the floor surface in that area is irregular and calculations based on concrete details from the drawings are difficult.

The concrete floor in Container Storage Area 2E slopes to four floor sumps located throughout the storage area. The floor sumps are constructed of stainless steel with dimensions of 3'0" square by 3'0" deep. Therefore, each has a total capacity of 202 gallons, or a total capacity in storage area 2E of 808 gallons. Table 4-3 in Attachment 4-8 lists the storage capacity for Container Storage Area No. 2. Exhibit 9 shows the drainage and sewer systems at the facility and indicates the material of construction of the pipes in the system.

Truck Station 1 and 2 (see exhibits  $40\,\mathrm{A}$  through  $41\,\mathrm{D}$ ) are constructed of reinforced concrete with an average curb height of  $4\frac{1}{2}$  inches. They are covered buildings. the floor slopes to a 43 cubic foot catch basin located in the center of the building. A 16 foot by 1 foot trench runs across each bay to the sump. The average depth of the trench is 4 inches.

The concrete pads are maintained in good condition, free of any gaps, holes or cracks. The structural integrity of the concrete pads will be maintained through daily inspections, and any necessary corrective action. Since the material used to fill cracks found in secondary containment areas can not be applied in cold weather, any cracks found when the weather is not conducive to repair will be filled once the weather is deemed acceptable (this will be noted on

the daily inspection sheets). Design details and materials of construction are presented in Exhibits 23A, 23B, 24A, and 24B as well as in the report included in Attachment 4-11. The concrete is compatible with the wastes stored on it.

#### 4.2.4 Control of Run-on [OAC 3745-50-44(C)(1) and 3745-55-75(B)(4)]

Run-on is prevented from entering the Container Storage Area No. 1 by the presence of a concrete dike wall at the perimeter of the storage area, as shown on Exhibit 23 A. This dike is higher than the surrounding grade, which slopes away from the dike to encourage drainage away from the area. Additionally, the floor elevation in Container Storage Area No. 1 is higher than the surrounding Grade. The area is covered by a roof.

Run-on into Container Storage Areas Nos. 2B, 2D and 2E is not probable since there is a concrete berm to keep the run-on away from the building, as shown on Exhibit 24A, Section A-A. These areas are within an enclosed building.

Run-on into truck station 1 and 2 is not probable since the driveway into and out of the buildings slopes upward to keep the run-on away from the building. These areas are within an enclosed building.

The loading bays have roof overhangs to keep the rainwater out of the warehouses.

## **4.2.5** Removal of Liquids from Containment System [OAC 3745-55-75(B)(5) and 3745-50-44(C)(1)]

Detection of liquids in the containment system is visual. A daily inspection is made of the containment systems and any accumulated liquids are noted. If any accumulation of solvent or waste liquids is detected, the liquids will be pumped into containers, within 24 hours when possible, using equipment such as a portable pump for eventual recycling or disposal.

A visual determination of the nature of the spilled liquid (e.g., oily sheen or two-phase layering which would indicate solvents) will initially be made. Spilled liquid of uncertain nature will be chemically analyzed prior to recycling or disposal. Methods described in Appendix 3-1 will be used for the analysis.

#### 4.2.6 Test for Free Liquids [OAC 3745-50-44(C)(1)(b)(i)]

A paint filter test is performed, if necessary, to establish if free liquids are present. The test method used is EPA Method 9095, as indicated in Appendix 3-1.

#### 4.3 TANK SYSTEMS

The storage tanks at the Hebron Recycle Center are used for a variety of purposes, including product storage, fuel blending, in-process materials storage and hazardous waste storage. Of these uses, the storage of hazardous wastes and fuel blending are the only uses that are regulated under RCRA.

The facility has capacity to store 1,237,500 gallons of hazardous wastes in 74 tanks and Solids Storage Bin #2. Management of bulk wastes generally involves storage of wastes as well as transfers to and from the truck stations and container storage areas. When a tanker loaded with waste is accepted at the facility, the manifest or shipping papers are examined to ensure that the waste matches the pre-shipment documentation and the contents are sampled, using the procedures discussed in the Waste Analysis Plan (Appendix 3-1 of this permit application), to confirm that the wastes are suited for storage and processing at the Hebron Recycle Center. Bulk

#### **ATTACHMENT 4-4**

(TABLE 4-1)

CAPACITY OF CONTAINER STORAGE AREAS

FOR THE CLEAN HARBORS HEBRON, OHIO FACILITY

TABLE 4-1
CAPACITY OF CONTAINER STORAGE AREAS

STORAGE AREA	STORAGE CAPACITY						
	GALLONS	INDIVIDUAL UNIT CAPACITY (EQUIVALENT 55-GALLON DRUMS)					
No. 1	158,400	2,880					
No. 2 Total	40,630	738					
В	13,200	240					
D	19,360	352					
Е	8,070	146					
Truck Station No. 1	13,200	240					
Truck Station No. 2	13,200	240					
TOTAL	225,430	4,098					

NOTE: Secondary containment calculations are presented in Attachment 4-8

# ATTACHMENT 4-8 SECONDARY CONTAINMENT CAPACITIES AT THE CLEAN HARBORS HEBRON, OHIO FACILITY (TABLE 4-3 AND CALCULATIONS)

TABLE 4-3
SUMMARY OF SECONDARY CONTAINMENT CAPACITY CALCULATIONS

UNIT/AREA	SECONDARY CONTAINMENT NET CAPACITY (GALLONS)*	FOR CALCULATIONS SEE EXHIBIT NO.
Container Storage Area No. 1	33,690	23C
Container Storage Area No. 2B	1,426	24D
Container Storage Area No. 2D	1,972	24D
Container Storage Area No. 2E	808	24D
Truck Station No. 1	5,382	40C
Truck Station No. 2	5,382	41D
Tank Farm No. 1E	62,588	**
Tank Farm No. 1W	73,958	**
Tank Farm No. 2	133,067	**
Tank Farm No. 3	121,768	**
Tank Farm No. 4	31,335	**
Tank Farm No. 6	23,952	**

All secondary containment net capacities are based upon containers being stored directly on the floor instead of on pallets since this results in a more conservative net volume. Area 2C is a processing area and not used for storage of hazardous wastes.

<sup>\*</sup> Net Capacity = Total Capacity - Displacements

<sup>\*\*</sup> The secondary containment calculations for the Tank Farms are presented in pages 4-8-2 through 4-8-8.

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Clean Harbors conducts regular inspections of the facility for equipment malfunctions, structural deterioration, operator errors and discharges that could cause or lead to the release of hazardous waste constituents and adversely affect the environment or threaten human health.

Plant personnel are responsible for conducting the inspections of all hazardous waste management areas. Clean Harbors will conduct inspections to detect the following problems:

- Structural deterioration;
- Damaged or missing parts on safety, emergency and monitoring equipment;
- Defects of security devices; and
- Any release of hazardous wastes.

Table 6-2 lists the various inspections and the frequency they are conducted:

Table 6-2		
Inspection	Frequency	
Container Storage Areas	Daily	
Tank Farms	Daily	
Facility (Security, Lighting, Warnings)	Daily	
Spill Boxes	Weekly	
Emergency Generator	Weekly	
Fire Equipment (Fire Pump, Hydrants/Valves, Sprinklers)	Weekly	
Communications	Weekly	
Monitoring Equipment (LEL Monitors)	Weekly	
Emergency Eyewash/Shower	Weekly	
Emergency Respiratory Equipment (Oxygen Bottles)	Weekly	
Fire Extinguishers	Monthly	
Emergency Exit Signs/Lights	Monthly	
Facility Doors	Monthly	
Facility Firewater Sprinkler System	Monthly	
Tank High Level Alarms	Monthly	
SCBA's	Monthly	

All daily, weekly, and monthly results of inspections are entered on inspection forms. Any irregularities are forwarded to the Operations Manager for action on the day of the detection. Remedial actions will be taken according to the following:

- Remedy any deterioration or malfunction of equipment or structure which the inspection reveals; and
- Carry out the remedial action on schedule which insures that the problem does not lead to an environmental or human health hazard.

Inspections and any actions taken are logged on the appropriate form and are kept for at least three years.

#### 6.2.2 Container Inspection [OAC 3745-55-74]

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Spent solvents consisting of primarily chlorinated solvents are received in 55-gallon containers from industrial users for storage and recycling at this facility. Spent solvent wastes from industries such as the chemical or pharmaceutical process industries received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-waste codes), and commercial chemical products, manufacturing intermediates, or off-specification commercial chemical products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste.

The Hebron Recycle Center uses gravity separation, distillation, fractionation, and blending to recover or recycle organic solvents and similar materials. Solids, such as still bottoms and sludges received from customers or other Clean Harbors facilities will be blended for use in the industrial fuel program. Certain components separated by processing, residuals from recycling, and some wastes received at the facility for storage that are not amenable to processing at the facility are sent off-site for additional processing, reuse, burning for energy recovery, incineration, or disposal.

Clean Harbors stores hazardous waste prior to processing in the following areas: tank farm and container storage areas. The wastes received from the customers are stored in the facility with a total capacity as follows:

- Clean Harbors is permitted to store 1,237,500 gallons of hazardous wastes in 74 tanks and Solids Bin #2.
- The facility's maximum existing container storage capacity for hazardous wastes is 225,430 gallons.

The facility's public address system can be heard at any location throughout the plant, including process areas, container storage areas, truck stations, the locker room, and the lunch room. Therefore, all plant employees would be notified in the event of an emergency.

A site plan layout, Exhibit 5, is provided as Attachment 7-5.

# 7.2 EMERGENCY COORDINATORS [OAC 3745-54-52(D) and 3745-54-55]

If an emergency situation develops at the facility, the discoverer will contact an Emergency Coordinator as listed in Attachment 7-1, OAC 3745-54-52(D) and 3745-54-55. The emergency coordinators should be called in the order they are listed. The site Compliance Manager will be contacted regardless of whether or not he or she needs to act as an emergency coordinator, to offer and address specific potential environmental concerns resulting from the incident. All persons listed as Emergency Coordinators have authority to commit resources of the company to deal with emergencies for the hazardous waste management activities of the facility.

In the event that none of the listed emergency coordinators can be reached, the most senior employee of the facility should be contacted. Although he or she does not have authority to commit company resources, he or she will serve as interim Emergency Coordinator until such time as he or she can locate the proper listed coordinator and be relieved.

The job descriptions for the primary Emergency Coordinator, the General Manager, as well as the Alternate Emergency Coordinator, the *Facility Operations Supervisor and Plant Engineer and Facility Maintenance Supervisor*, are provided in Section 8, Attachment 8-1.

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TABLE 9-2 CONTAINER STORAGE AREAS TO BE CLOSED

STORAGE AREA	MAXIMUM STORAGE CAPACITY	
	GALLONS	INDIVIDUAL UNIT CAPACITY (EQUIVALENT 55-GALLON DRUMS)
No. 1	158,400	2,880
No. 2 Total	40,630	738
В	13,200	240
D	19,360	352
Е	8,070	146
Truck Station No. 1	13,200	240
Truck Station No. 2	13,200	240
TOTAL	225,430	4,098

NOTE: All container storage areas are concrete, design information can be found in Section 4

# Attachment 9-1A Closure Cost Estimate

#### **CLOSURE COST ESTIMATE**

This attachment contains the Closure Cost Estimate for closure of the existing Clean Harbors Hebron Recycle Center as required by OAC 3745-50-44(A)(15). All estimates are based upon the cost to a third party to perform the closure activities described in the associated Closure Plan presented in Section 9 of this permit application. The unit costs used to derive cost estimates are presented as a side note to each individual calculation.

OAC 3745-55-42(A)(12) requires the owner or operator of hazardous waste management units to base closure and post-closure cost estimates on "third party" costs. Third party has been defined in the regulations as a party other than the parent or the subsidiary of the owner or operator. In this Closure Cost Estimate, Clean Harbors has used third party costs in determining the total closure costs, assuming that a third-party will process or dispose of all inventory and residuals off-site and decontaminate all permitted units at the time of closure.

Third party costs are used in this Closure Cost Estimate for the purpose of generating a worst-case estimate for Financial Assurance. Actual closure activities will probably involve use of Clean Harbor's personnel, on-site recycling and reclamation as well as fuel blending, and subsequent sale of the products generated. However, this Closure Cost Estimate does not incorporate salvage values or any other credit that will exist if closure activities are performed by Clean Harbors.

The estimated closure cost corresponds to the complete final closure of the facility as it currently exists, accounting for all existing regulated units and the existing maximum hazardous waste inventory. As indicated in the associated Closure Plan, closure of the facility will involve off-site processing of the waste. All other on-site processed materials will be shipped off-site for use as fuels. The closure cost estimate assumes that normal decontamination procedures will yield clean closure.

Clean Harbors currently utilizes closure insurance as the financial assurance mechanism which includes the costs for performing closure of all hazardous waste management units.

This Closure Cost Estimate incorporates administrative costs, which accurately represent administrative expenses, including supervision, project management, and other direct costs, that will be required during the closure period.<sup>1</sup>

The Closure Cost Estimate shall be adjusted annually for inflation and revised whenever a change in the Closure Plan increases or decreases the cost of closure. The Closure Cost Estimate will be revised as new units are brought into operation, and will be submitted no later than 30 days after the Ohio EPA has approved the revised Closure Plan. Financial assurance will also be revised at least 60 days prior to starting hazardous waste operations in the new units. Copies of the original Closure Cost Estimate, proposed Cost Estimate, any revisions, and the latest adjusted estimate shall be kept at the facility during the facility's operating life.

#### **Facility Closure Cost**

As summarized in Table 6, the estimated cost for closing the facility is \$1,877,651. The calculations performed to arrive at this total are found in Tables 1 through 5 of this Closure Cost Estimate (the unit costs and assumptions have been included).

### **INVENTORY REMOVAL AND OFF-SITE PROCESSING**

	Item and Assumption	Cost
1	Removal and Processing of Container Inventory	
	a. Transport of containerized wastes inventory (4,417 drums, 80 drums/truck @ \$5.00/loaded mile, 150 miles)	41,409
	b. Off-site processing of containerized wastes (4,417 drums \$66/drum)	291,522
2	Removal and Processing of Tank Inventory	
	a. Bulk transportation of tank inventory (1,237,500 gal. @ 7,000 gal/truck, \$645/truck, 120 miles)	114,165
	<ul><li>b. Off-site disposal tank inventory (1,237,500 gal @ \$0.50/gal)</li></ul>	\$618,750
	TOTAL INVENTORY REMOVAL AND OFF- SITE PROCESSING COST	\$1,065,846

# **DECONTAMINATION OF SECONDARY CONTAINMENT AREAS**

	Item and Assumption	Cost
1	Rental/Purchase of Decontamination Equipment	
	a. Vacuum truck (Included in Table 2 cost summary)	
	b. High pressure/low volume cleaner (20 areas @ 1day/area, \$120/day)	\$2,400
2	Labor for Decontamination (68,209 ft <sup>2</sup> ; 2 person-hours/1,000 ft <sup>2</sup> , @ \$38/hour)	\$5,184
3	Handling of Decontamination Wash/Rinsewaters	
	<ul> <li>a. Transport of miscellaneous residues (68,209 ft<sup>2</sup> @ 1 drum/5,000 ft<sup>2</sup>, 80 drums/load, \$5.00/loaded mile/truck, 125 miles.)</li> </ul>	\$625
	b. Off-site treatment/disposal of miscellaneous residues (16 drums, @ \$ 98/drum)	\$1,568
	c. Off-site processing of rinseates from all secondary containment areas* (68,209 gal. @ \$0.47/gal)	\$32,058
	d. Bulk transportation of rinseate (68,209 gallons @ 7,000 gallons/truck, \$640/truckload)	\$6,420
4	Decontamination Sampling and Analysis (68,209 ft <sup>2</sup> @ 1 sample/2,500 ft <sup>2</sup> , \$359/sample)	\$9,795
	TOTAL SECONDARY CONTAINMENT AREAS DECONTAMINATION	\$58,050

<sup>\*</sup> The secondary containment areas include the tank farms, container storage and handling areas, and truck stations.

**Facility:** Tank Farms: 16,699 ft<sup>2</sup>; Container Storage Areas (including truck stations 1, 2, and 7) 38,337 ft<sup>2</sup>; and Truck Stations (excluding No. 1, 2, and 7) 13,173 ft<sup>2</sup>

### **MISCELLANEOUS FACILITY CLOSURE COSTS**

	Item and Assumption	Cost
1	Treatment of Contaminated Stormwater from Uncovered Secondary Containment Areas*	
	a. Off-site treatment of contaminated stormwater (22,057 gal. @ \$.47/gal)	\$10,367
	<ul> <li>b. Bulk transportation of stormwater (22,057 gallons</li> <li>@ 7,000 gallons/truck, \$642/truckload)</li> </ul>	\$2,022
2	Utilities (180 days @ \$158/day)	\$28,440
3	Personal Protective Equipment Cost	
	a. Tyvek suits, gloves, boots, etc (723 person-hours; /8 hours/day, @ \$44/day)	\$3,977
	b. Respiratory protective equipment (Lump sum)	\$3,059
	TOTAL MISCELLANEOUS FACILITY CLOSURE COST	\$47,865

<sup>\*</sup> Assuming that rainfall over 180 day closure period will be approximately 15 inches (half of mean annual rainfall), and that 10% of this rainfall/stormwater, that is 1.5 inches, becomes contaminated.

# TABLE 5 CLOSURE ADMINISTRATION AND CERTIFICATION

	Item and Assumption	Cost
1	Administration (including project management, supervision)	\$57,950
2	Closure Certification	
	a. Certification by Independent Professional Engineer (2 4-hour visits/week, 26 weeks @ \$168.50/hour)	\$35,772
	TOTAL CLOSURE ADMINISTRATION COSTS	\$93,722

### **TOTAL CLOSURE COSTS**

	Item and Assumption	Cost
1	Inventory Processing and Removal	1,065,846
2	Decontamination of Tanks and Associated Equipment	\$199,939
3	Secondary Containment Areas Decontamination	\$58,050
4	Miscellaneous Facility Closure Costs	\$47,865
5	Administration and Certification	\$93,722
	SUBTOTAL CLOSURE COST	\$1,465,422
	15% Contingency	\$219,813
	TOTAL CLOSURE COST	\$1,685,235
	Inflation Cost 2013 1.017	\$1,713,884
	Inflation Cost 2014 1.015 Inflation Cost 2015 1.014	\$1,739,592 \$1,763,946
	Inflation Cost 2016 1.010	\$1,783,546 \$1,781,586
	Inflation Cost 2017 1.013	\$1,804,746
	Inflation Cost 2018 1.018	\$1,837,232
	Inflation Cost 2019 1.022	<b>\$1,877,651</b>
	Inflation Cost 2020 1.017	\$1,909,571
	TOTAL CLOSURE COST	\$1,909,571.00

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#### **SECTION 12**

#### CERTIFICATION

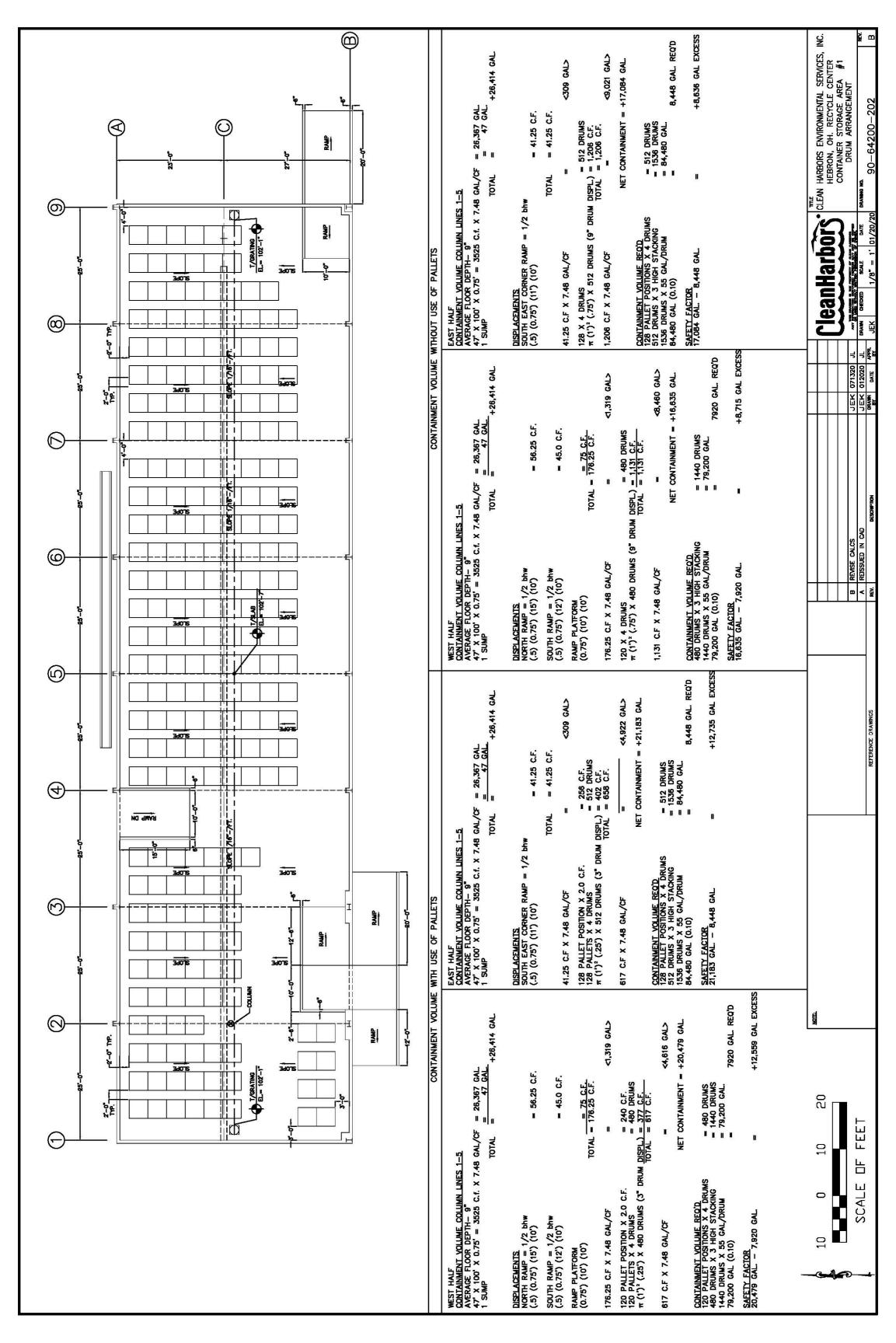
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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 fine and imprisonment for knowing violations.

James Childress

Nice President Environmental Compliance - East

Clean Harbors Environmental Services, Inc.

# RCRA PART B Application Exhibit 23C Revision A



# RCRA PART B Application Exhibit 24C Revision 7

