ADVANCED CHEMICAL TREATMENT, LLC.

ALBUQUERQUE SERVICE CENTER

PERMIT

ATTACHMENTS

February 9, 2026

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PERMIT ATTACHMENT A FACILITY DESCRIPTION

A.1 INTRODUCTION

Advanced Chemical Treatment LLC. (ACT, the Facility, the Permittee) is a U.S. service-oriented company that accepts, treats, stores, and manages hazardous wastes from offsite generators and customers. The generators from which ACT accepts hazardous wastes include, but are not limited to, pharmaceutical, manufacturing, research, high tech, government, and other types of industries and businesses. The Facility also conducts several activities that involve the accumulation, storage, and transfer of hazardous waste, including household hazardous wastes. These wastes are transported from ACT to independent permitted disposal facilities.

The Facility was originally owned and operated by Rinchem Company, Inc., solely as a hazardous waste container storage and transfer Facility. However, on October 7, 2011, NMED approved a permit modification for transfer of ownership to ACT Property Acquisition Partners V, LLC and the operation of the Facility to Advanced Chemical Treatment LLC (ACT).

The Facility is allowed to receive, manage, store, and treat hazardous wastes in either bulk loads (e.g., tanker trucks, roll-off boxes) or containers (e.g., 55-gallon drums, totes, etc.). The wastes are transported to the Facility by properly licensed transporters. Wastes received at the Facility will be sampled and analyzed to evaluate the chemical and physical properties of each waste stream, and the conformity of the waste with the original waste profile Forms or Safety Data Sheets.

ACT also consolidates/blends hazardous and solid wastes in containers such as drums, cubic yard boxes, totes, tanker trucks, and roll-off bins. ACT is a large quantity generator and transporter of hazardous waste, including used oil. The Facility manages and transfers universal waste, mercury bearing lamps and aerosols. It also serves as an accumulation point for various hazardous wastes generated by ACT customers. These wastes include used lithium, lead-acid, nickel, cadmium, alkaline, and nickel metal hydride batteries.

A.2 LOCATION OF THE FACILITY

The Advanced Chemical Treatment (ACT) hazardous waste Container storage and treatment Facility is located at 6137 Edith Boulevard N.E. in the City of Albuquerque, Bernalillo County, New Mexico. The Facility lies on latitude 35° 08’ 37” N, and longitude 106° 37’ 34” W and occupies 1.75 Acres of land. Figure 1 in Permit Attachment M (Figures) is a map showing the general location of the Facility in the City of Albuquerque.

A.2.1 Climate at the Facility

The climate in this part of the City of Albuquerque where the Facility is located is an arid, continental climate. Rainfall varies, but in the vicinity of the Facility, the average annual precipitation ranges from 7 to 10 inches. The average annual snowfall is about 10 inches. The average temperature in winter is approximately 38 degrees F and 74 degrees F in summer. Winds blow from the north in winter and from the south in summer. The average annual wind speed is 9

miles per hour. A wind rose showing the prevailing wind speed and direction is presented in Figure 2, Permit Attachment M (Figures).

Albuquerque is located in the Rio Grande Valley and is bordered on both sides by mesas rising to about 5,000 feet above mean sea level. The elevation at the Facility/Service center is approximately 5,100 feet.

A.2.2 Geologic and Hydrologic Characteristics of the Facility

Advanced Chemical Treatment LLC lies within a developed industrial area with little to no habitat for ecological receptors and no appreciable vegetated areas. It is in the northeast portion of the greater Albuquerque metropolitan area on the valley floor between the modern channel of the Rio Grande, which is located 2.5 miles to the west, and the Sandia Mountains located 8 miles to the east. The Facility is built on several feet of artificial fill material placed on the site to raise the base elevation of the Facility above the adjacent Rio Grande floodplain. Beneath the artificial fill are Holocene-aged floodplain deposits of unconsolidated pebbly to gravelly coarse sand with lenses of fine sands, silts, and clays. These deposits are underlain by a sequence of Pleistocene and successively older sedimentary units derived from adjacent highland erosion slope wash (alluvial fan deposits) interbedded with flood deposits from the ancestral Rio Grande.

The nearest surface water features are dry unnamed storm water drainage channels, which lie 0.3 miles to the east and west that ultimately discharge into the Rio Grande (2.5 miles west of the Facility). In addition, there are two approximately 1-acre storm water infiltration basins (approximately 200 feet north and adjacent to the south) which collect/infiltrate urban runoff from the surrounding urban area (but not the Facility). The nearest residence is located approximately 0.1 miles southeast of the Facility, and there are approximately 6,555 residents within a one-mile radius.

A.2.3 Seismic Standard

The City of Albuquerque, where the Facility is situated, is located in the central portion of the Rio Grande Rift that trends north-south through the entire state and is locally bordered by the Sandia Mountains to the east and the lower gentler sloping mesas of the Llano de Albuquerque to the west. The U.S. Geological Survey map of the Albuquerque Quadrangle shows an inferred trace of a buried fault approximately 2.5 miles east of the Facility; however, Holocene-aged displacement of this fault is not evident. Figure 3 is a topographic Map of the City of Albuquerque showing the location of the Facility. An examination of publicly available aerial photographs of the Facility and surrounding area within 3,000 feet of the Facility also shows no surface indications of faulting, such as lineaments (lineation). Thus, the Facility location meets the standards at 40 CFR § 270.14(b)(11)(ii)(B).

A.2.4 Flood Plain Information

The Facility lies at an elevation of approximately 4,990 feet above mean sea level and is relatively flat, with a gentle slope from the east to west. Surface storm water runoff on the Facility is towards two onsite rainwater and runoff storm water containment ponds located on the western edge of the

property. The Facility lies partially within the 100-year flood plain, which covers almost the eastern half of the Facility. Being built approximately five feet above the surrounding area, the Facility is less prone to flooding during moderate to severe storms. A Federal Emergency Management Agency (FEMA) Map shows the flood plain in Figure 4, Permit Attachment M (Figures).

A.2.5 TRAFFIC PATTERNS, VEHICLES, AND FACILITY ROADS

There is only one street approach for vehicles to access the ACT Facility, which is located 600 feet west of Edith Boulevard, a major city paved road. Vehicles turn west from Edith Boulevard onto a private road to access the Facility. The access road is constructed of three inches of asphaltic pavement placed over a six-inch gravel base and is designed to carry heavy loads typically hauled by tractor-trailer trucks (e.g., 18 wheelers). The access road leads directly to a parking area outside and to the north of the entrance gate that leads to the loading/unloading dock. The Facility office is located immediately north of the entrance gate, and west of the parking lot. The office is marked with a sign.

Various commercial vehicles are used to transport wastes on and off the Facility. These vehicles can be tanks, flat or van trailers, or box vans. The maximum axle weight for any of these vehicles is about 16,250 pounds, with a maximum gross weight of about 80,000 pounds. Typical loads delivered or leaving the Facility fall within a range of 35,000 to 42,000 pounds. A security gate (normally kept closed, except when opened for deliveries or shipments) separates the parking lot from the Facility loading dock area and yard, thus preventing unauthorized entry by the public. Trucks will generally back-up directly to the paved, loading dock area, and then pull forward through the gate to leave the Facility after loading or offloading activities are completed.

The general public parks in the lot that is located next to the Facility office. Vehicles utilized by the public include family cars and light-duty trucks.

A.2.5.1 Estimated Traffic Volume

In-bound and out-bound vehicle traffic at the Facility operations has minimal impact on traffic in the industrial area adjacent to the Facility. Total traffic volume at the Facility varies daily depending on shipment and delivery schedules.

In general, there are 2 commercial truck deliveries or shipments per day. Approximately 24 commercial vehicles enter and leave the Facility per month. In- bound and out-bound loads are scheduled to minimize congestion at the Facility.

A.2.5.2 Traffic Controls at the Facility

Two stop signs are located at the entrance gate to the loading/unloading dock. One of the stop signs informs the drivers that they must report to the office before proceeding further. For commercial loads, after receiving permission from the office, the gate is opened, and the driver escorted to the dock. After leaving the Facility by way of the access road, vehicles must stop at a stop sign that is located at the intersection of the access road and Edith Blvd before turning onto Edith Boulevard.

A.2.6 Surrounding Land Use

The Facility conducts its operations on 1.75 acres of land owned by ACT Property Acquisition Partners V, LLC. The entire site is zoned M-1 and is situated in an urban area containing nearby commercial/light manufacturing facilities which are then bordered by mainly residential areas. The immediate adjacent properties include Koch Mechanical (North), MGP Mechanical (Southeast), Keith's Creations (Southeast), Riccobene (Southeast), ACNM (East), Rinchem East (East), and We Care Agency (East). Figure 5, Permit Attachment M shows the land use around the Facility.

A.2.7 Facility Design

The ACT treatment and storage facility consists of six hazardous waste storage areas, namely warehouses A-F, a loading/unloading dock, and truck loading areas. A household waste accepting area is in front and east of the Facility, and two rainwater and runoff containment ponds are located on the west side of the Facility. The seventh warehouse/room houses administrative offices and RCRA specified warehousing used by used by personnel operating the treatment and storage Facility. One Hazardous Waste Consolidation area is located on the West Operations Dock. Figure 6, Permit Attachment M (Figures) shows the Facility layout and hazardous waste management areas.

A.3 DESCRIPTION OF BUSINESS ACTIVITY

The following sections contain a description of the hazardous waste management activities conducted by Advanced Chemical Treatment LLC. (ACT), including a description of the six hazardous waste management areas/warehouses.

A.4 TREATMENT BY FUEL BLENDING

ACT conducts treatment by fuel blending for the purpose of energy recovery. Blending of fuel wastes destined for energy recovery will take place in the area with a grounding system as shown in Figure 6, specifically at the Loading Dock Parking Area . Fuel blending may be conducted in one or more of the various containers described below in accordance with the regulatory requirements of 40 CFR § 270.23 (a)(1), specifically, the maximum volume of wastes to be blended varies depending on the waste type and waste inventory.

The following are the acceptable waste codes for fuel blending: D001, D004 through D011, D018, D019, D021-D030, D032-D042, F, K, and U wastes.

The maximum quantities of waste to be blended in one or more of the following containers are as follows:

Liquid wastes in smaller single or combination packaging may be blended into larger containers for off-site energy recovery based on economic advantage to the Facility and compatibility of the waste being consolidated. Blending can utilize any size combination or single packaging

container, including bulk containers. Blending of wastes destined for energy recovery will take place in areas with grounding systems, referred to as Fuel and Waste Consolidation.

The maximum quantity of wastes to be blended in a tanker truck (5,500 gallons per day) or any combination of the other containers listed below shall not exceed 5,500 gallons per day, in compliance with the quantities in Permit Attachment B (Authorized Wastes), Part A, Section 6, Line Number 7):

- Bulk liquids (tanker) – 5,500 gallons per day (Weekly).
- Bulk liquids (non-tanker) – 330 gallons per day (Weekly).
- Bulk tote container - 275 gallons per day (Weekly)
- 55-gallon drums at 275 Gallons per day (Weekly)

ACT will transfer drums and totes, of like compatible materials, directly into a vacuum tanker trailer on a weekly basis which ensures that the Facility is under the permitted storage limits.

The fuel and waste consolidation areas are built upon a concrete base and contain a sloped loading dock and a series of connected containment sumps in each bay, providing approximately 1,400 gallons of secondary containment.

A.5 LIQUID FUEL AND WASTE CONSOLIDATION

ACT conducts consolidation of liquid fuels and non-fuel liquids in lab packs and non-lab packs containers.

All hazardous waste containers are stored with compatible materials and consolidated into the following categories for shipment out of the facility to a permitted facility for final disposition determination by thermal treatment, incineration, or landfill disposal. These include non-lab pack consolidated liquids and solids, loose packs, and universal wastes that will be recycled for energy.

A.5.1 Non-Lab Packs and Lab Packs

The following are Lab Pack Acceptable RCRA Waste Codes: D001-D043, F, K, P, and U Wastes. The following are examples of non-Lab Packs:

a. Non-Lab Packs

- Liquid Consolidation
  1. Thermal Treatment -fuel blending, incineration, Thermal Desorption treatment.
  2. Landfill (Stabilization).
  3. Oil-Incineration or recycling
- Solid Consolidation
  1. Debris-fuels blending, waste to energy, or landfill.
  2. Solid compatible materials- fuels blending, waste to energy, or landfill.
- Loose Packs (consolidation)
  1. Chemical Sharps-incineration or recycle.
  2. Vials-incineration.

3. Aerosols-incineration.

- Universal waste (recycling, waste to energy).

Lab-Packs

- Unacceptable Lab-Packs - Excluded Hazard Classes from all Lab-Packs: 1 - Explosive; 2 - Compressed Gases; 3 - Infectious; 4 - Radioactive. Also Unacceptable for Lab-Packs are: TSCA Regulated Wastes; any shock-sensitive and/or DOT temperature control materials that have not been de-activated for safe storage at Standard Temperature and Pressure (STP) and transport via roadways and any wastes having RCRA Waste Codes the facility may not receive.

- Non-Reactive Lab-Packs - Incineration Fuels / Energy Recovery, RORGS, CMBST, etc. if High BTU and/or Class 3; - each on case by case
  i. Additionally, excluded from fuel blending are all: RCRA D003, D009 Coded Wastes

- Reactive Lab-Packs -All other, non-excluded hazard classes singly expressed or within combination, D003 Coded Waste. Deactivate and/or incinerate.

- 6.1 - Toxic, PGI Lab-Packs - Must not be combined with others but rather packed solely with the same hazardous-chemical named substances. Incinerate.

- Elemental Mercury Lab-Packs- Bulked/Consolidated - Elemental Mercury in Containers, RCRA Waste Code D009. Recycle, Retort.

- Elemental Mercury in Manufactured Articles - Elemental Mercury in Manufactured Articles, RCRA Waste Code D009. Recycle, Retort.

- Mercury Compounds Inorganic - May be all other, non-excluded hazard classes singly expressed or within combination, RCRA Waste Code D009 containing and/or Household Hazardous Waste (RCRA Excluded). Retort, Incineration, Treatment, Landfill. Lab Pack Acceptable RCRA Waste Codes D001, D002, D003,D004,D005,D006,D007,D008,D009,D010,D011,D012,D009,

A.5.1.1 Lab-Packs Management and Outbound Shipment Procedures

Once received at the facility documentation will be reviewed and verified.

Lab-Pack Containers to be stored in the warehouse shall be manually segregated by a Lab-Pack Chemist for Consolidation in accordance with DOT, EPA/NMED regulations and Chemical Properties. The following are the 6 types of segregations:

1. **Drum-In-Drum-Out** (DI/DO) containers that are not consolidated but rather sent as-is to the Facility for off-site disposal.
2. **Non-Reactive wastes**.
3. **Reactive Lab Packs.** These are further segregated into: i) Non-Lithium Materials and ii) Lithium Materials.

4. **Mercury Items** – Mercury Items are further segregated into the following: i) Elemental Mercury, ii) Mercury in Manufactured Articles, iii) Mercury Debris, and iv) Inorganic Mercury Compounds.
5. **Poison Inhalation Hazard** (PIH) **Materials**. Poison Inhalation Hazard Materials are physically consolidated only if it can be verified from its original packaging configuration as keeping its inner packaging intact. Otherwise, PIH Materials are a DI/DO Material sent out as-is for offsite disposal.
6. **Organic Mercury Compounds** (may need to be exported by the Final Non-ACT TSDF / Outbound TSDF to Canada due to EPA requirements for mandated treatment standards for Mercury disposal options).

The Consolidation and Drum-In-Drum-Out containers are then profiled for disposal to their EPA/State Agency Permitted Outbound TSDF(s) based on DOT (shipment requirements), EPA/NMED and Outbound TSDF requirements.

After Manifest Package approval, the material may be shipped to the TSDF and is shipped according to all applicable DOT shipment requirements, EPA and Outbound TSDF requirements within the regulated timeframe to ensure proper waste storage and shipping requirements of the Permit are fulfilled.

Manifest Packages shall be maintained in accordance with record keeping requirements of this Permit. All materials entering the facility will be subject to the following phases to simplify the overall stock control process and to ensure that product codes are matched to the product codes slated for final disposition.

A.5.2 Consolidation of Liquid Fuels

Once liquid fuels are received at the facility, documentation will be reviewed and verified and the following measures taken:

1. Physical inspection and QA/QC verification shall be performed on containers. Sampling shall be conducted based on a cubed root rule to verify analytical results, product and process codes shall be verified and final disposition of waste determined.
2. If analytical results indicate a high percentage of water, then every container manifested on that line item will have samples taken and analytical testing conducted.
3. Waste segregated and stored in facility.
4. Based on waste composition, analytical results, and process knowledge, liquid fuels will be given a BTU rated value of less than 2000 BTUs, between 2000 and 5000 BTUs, greater than 5000 BTUs.
5. Based on the determined BTU value of the fuels, materials shall be consolidated/bulked and shipped to off-site permitted facilities based on the following information.

    a. Fuels with a BTU value between >2000 and $\geq$5000 BTUs are consolidated and transported for incineration or fuels blending.
    b. Fuels with a BTU value < 2000 BTUs will be consolidated and transported for incineration, offsite fuel blending or lean water incineration.

c. RCRA waters (lean waters) are processed as drum in drum out (DI/DO) or consolidated and transported for offsite treatment.

A.5.3 Consolidation of Non-Fuel Liquids (Oils, Lean Water, Deep Well Water)

1. Once non-fuel liquid wastes are received at the facility Advanced Chemical Treatment LLC. will review and verify documentation.
2. This will be followed by physical inspection and QA/QC verification of the containers.
3. Sampling will be conducted to verify analytical results, product and process codes will be verified and final disposition of waste is determined.
4. Physical inspection and QA/QC verification are performed on containers. If analytical results determine a greater than (>) 5% of water the product and process code will be updated within the waste manifest sheet (WMS) and materials.
5. Waste will be segregated according to process requirements (i.e. consolidation, fuel blending, Lab pack DI/DO) and stored in the facility.
6. Oils are scheduled for vendor consolidation at least every 35 days, as part of the vendor's procedures the oil containers will be checked for halogens. Those that test positive for halogens will be identified within the WMS, product and process codes updated, and the waste shipped out for incineration.
7. The remainder of the waste will be vendor bulked into a tanker and sent for recycling or disposal.

A.5.4 Consolidation of Solids and Loose Pack Materials

This includes solid consolidation of debris, solid compatible materials, loose packs (consolidation), chemical sharps, vials, and aerosols.

1. Once received at the facility documentation will be reviewed and verified.
2. Waste shall be segregated and stored in facility.
3. Materials are consolidated and shipped as the following:

a. Debris and solid compatible materials are shipped for fuels blending, waste to energy, or landfill.
b. Chemical Sharps shall be shipped for fuels blending or incineration.
c. Vials are shipped for waste to energy or incineration.
d. Aerosols are shipped for recycling.

Once accepted, containerized waste can be placed in one of the six storage areas/rooms A-F designed for storage of containers with proper segregation for subsequent consolidation and transfer offsite to a permitted facility.

Wastes will be stored in designated areas based on their compatibility to minimize the possibility of incompatible wastes commingling and reacting in the event of an accidental spill or release.

Containers are placed in labeled storage positions on a three-tier metal rack system or on the epoxy coated floor with a maximum of two containers high. Wastes within the facility shall be placed

along the interior walls or in the center of the room. Container storage positions are marked with paint on the floor and marked with overhead signs and/or bar codes.

Empty containers may be stored along the south side of storage room/Area F or in other areas depending on space availability. Empty drums may be staged in the parking lot in preparation for distribution to off-site clients for re-use.

A.6 STORAGE OF HAZARDOUS WASTE IN CONTAINERS

ACT only stores hazardous waste in rooms A, B, C, D, E, and F. A floor plan of the Facility showing the location of the storage areas is included in Figure 6, Permit Attachment M (Figures).

The following are the Acceptable Waste Codes that ACT, the Permittee is allowed to accept and manage in storage rooms A through F:

Storage Room A: D001-D016, D018-D036, D039-D040, D042, F006-F009, and P001-P063.

Storage Room B: D001, D004-D016, D018-D025, D028-D036, D038-D042, F001-F005, F024-F025, F034-F035, F037-F039, K001, K009-K010, K014-K016, K018-K019,K022-K026,K028-K032, K034-K037, K039-K041, K048-K052, K060, K073, K083-K087, K093-K097, and K101-K103, K11-K115, K25-K126, K132, K136, K141-K145, K147-K151, U001-U002, U004-U005, U010-U016, U018-U019, U021-U022, U024-U028, U030-U031, U034-U035, U037-U039, U041-U042, U044, U046-U048, U050-U052, U055-U059, U063-U064, U066, U068-U078-U088, U090-U095, U097-U099, U101-U102, U105-U107, U109-U114, U116-U118, U119, U12, U126-U128, U130-U132, U136-U138, U140-U141, U143-U144, U146, U148-U150, U153,U155-U159, U161-U167, U170-U174, U177-U181, U183-U188, U190-U194, U196-U197, U200-U201, U203, U206-U211, U215, U218-U222, U225-U228, U235-U237, U239, U243-U244, U248, U359 .

Storage Rooms C and D: D001, D004-D025, D028-D036, D038-D040, D042, F001-F005, F0240F025, F034-F035, F037-F039, K001, K009-K010, K014-K016, K018-K019, K022-K026, K028-K032, K034-K037, K39-K041, K048-K052, K060, K073, K083-K087, K093-K097, and K101-K103, K113-K115, K125-K126, K132, K136, K141-K145, K147-K151, U001-U002, U004-U005, U010-U012, U014-U016, U018-U019, U0210U022, U04-U028, U030-U031, U034-U035, U037-U039, U041-U042, U044, U046-U048, U050-U052, U055-U059, U063-U064, U066, U068-U078U080-U088, U090-U095, U097-U099, U101-U102, and U105-U107, U109-U114, U116-U118, U119, U12, U126-U128, U130-U132, U136-U138, U140-U141, U143-U144, U146, U148-U150, U153,U155-U159, U161-U167, U170-U174, U177-U181, U183-U188, U190-U194, U196-U197, U200-U201, U203, U206-U211, U215, U218-U222, U225-U228, U235-U237, U239, U243-U244, U248, U359.

Storage Rooms E and F: D001-D016, D018-D025, D028-D036, D038-D040, D042, F0060F009, and P001-P057, and P059-P063.

Table A.1 below shows the size and capacity of each storage warehouse/Room (A through F).

TABLE A.1: Size and Capacity of each Storage Area.

Storage Warehouse/Room	Length (Feet)	Width (Feet)	Area (Square Feet)	Maximum Storage Capacity (Gallons)
A	35.25	24	846	11,000
B	35.25	24	846	11,000
C	94.5	48	4536	59,400
D	95.9	47	4507	55,550
E	106	47	4982	71,500
F	106	47	4982	70,950
Maximum Permitted Capacity for all Warehouses			**20,699**	**125,000**

The following is a detailed description of the hazardous waste Container Storage Rooms A through F:

Rooms A and B Storage Areas:

Room A is designed to warehouse hazardous waste for distribution and waste that are sensitive to temperature change. However, Room A is currently used as a tech/office room and is not used for hazardous waste storage.

Room B is an active storage unit specifically designed to warehouse hazardous waste for distribution and waste that are sensitive to temperature changes. Rooms A and B are located within a steel structure and have a four-hour fire wall on the south end and a two-hour fire wall on the west end separating them from the other storage areas.

The floor of rooms A and B is recessed at least four inches below the stem wall. The expansion joints in the floor are caulked and the floor is sealed with epoxy to prevent possible contamination of the soil should a spill occur.

Warehouse ID	Length (ft)	Width (ft)	Ceiling height (ft)	Floor slope
A	35.25	24	14.5-16.5	0%
B	35.25	24	14.5-16.5	0%

Rooms C and D Storage Areas:

These active storage units are designed to warehouse hazardous wastes for subsequent transfer to off-site facilities. Rooms C and D are located within a steel structure and are approximately 100 feet x 50 feet each. All the room walls running north and south are four-hour fire walls and all east-west walls are two-hour fire walls. The floor is at least recessed four inches below the stem wall. Further, the floor has an epoxy seal on it to prevent contamination of the soil should a spill occur. The floors in the warehouse are recessed four inches below the stem wall and expansion joints are caulked. Shelving consists of steel racks.

Warehouse ID	Length (ft)	Width (ft)	Ceiling height (ft)	Floor slope
C	94.5	48	15-18	1%
D	95.5	47	15-18	1.5%

Rooms E and F Storage Areas

These areas are located within a metal structure located at the south end of the Facility and are approximately 106 feet x 47 feet in size . The walls of the building are four-hour fire walls. The floor slopes approximately 1-2% toward sumps in the northern or southern portion of each of the warehouses and has an epoxy seal on it to prevent contamination of the soil should a spill occur. Shelving consists of steel racks. The floors in the warehouse are recessed four inches below the stem wall and expansion joints are caulked.

Warehouse ID	Length (ft)	Width (ft)	Ceiling height (ft)	Floor Slope
E	106	47	15-18	1-2% toward catch basin
F	106	47	15-18	1-2% toward catch basin

Rack Information and Use of Storage Area

Shelving within each area consists of steel racks. Dimensions of the racks within the storage area, along with the intended use of each area, are presented below in Table A.2:

A.6.1 Drum Storage

ACT services diverse clientele and industries including pharmaceutical, manufacturing, research, high tech government and public entities, and many other types of businesses. Wastes are stored in the appropriate container storage areas based on RCRA waste codes, waste characteristics, and compatibility. Wastes shall not be held for more than 1 year and then sent to an appropriate disposal facility for further processing.

A.6.2 Condition of Containers

The Facility will ensure that all containers shipped to ACT by hazardous waste generators are: 1) in good condition with no severe rusting, structural defects, or damage, 2) compatible with the hazardous waste that is placed in them.

The Facility will also ensure that containers are properly closed to prevent spills and leaks. This includes checking tightness on bungs or ring bolts, verifying that lever locks are in correct orientation, and ensuring that locking mechanisms are in place, and that cubic yard boxes are correctly sealed and have pallet straps.

If a container of hazardous waste is damaged, leaking or found to be incompatible with the waste in the container, it will either be placed in a compatible over packed, or the waste transferred to another compatible container in good condition.

A.6.3 Inspection of Containers

Containers holding hazardous waste at the Facility shall be inspected on a minimum of a weekly basis as required at 40 CFR §264.174. Inspections will include looking for leaks, deterioration and bulging of containers. Containers shall be stored on the floor or on storage racks in a stable configuration.

TABLE A.1: Rack Information and Material Stored in Each Storage Area or Room

Location	Rack Height	Rack Width	Rack Depth	No. of Racks	Stacking	Waste Stored
Area A	NA	NA	NA	0	NA	Lab Packs
Area B	NA	NA	NA	0	NA	Lab Packs
C1	10’ 9”	9’ 4”	4’	9	Double	Flammable Solids
C2	12’	8’ 6”	3’ 6”	6	Quad	Flammable Solids
C3	12’	8’ 6”	3’ 6”	6	Quad	Household hazardous waste, Flammable toxins, Toxic solids, Vials, Sharps
C7	9’ 11”	9’ 4”	3’ 6”	9	Triple	Supplies
D1	10’	8’ 6”	3’ 6”	11	Triple	Flammable Solids and Liquids
D2	NA	NA	NA	0	Double	Flammable Solids and Liquids
D6	11’ 10”	8’ 6”	4’	1	Triple	Mercury
D7	11’ 10”	8’ 6”	4’	7	Triple	Aerosols, Flammable Solids and Liquids
E1	10’ 9”	9’ 4”	4’	10	Triple	Oils Acids, Bases
E2*	12’	8’ 6”	3’ 6”	10	Triple	Mixed Acids Bases, Mercury
E3*	12’	8’ 6”	3’ 6”	10	Triple	Household Hazardous wastes and Universal Wastes
E7*	NA	NA	NA	0	Double	PDL
F1	11’ 10”	9’ 4”	4’	11	Triple	Non-Regulated solids and Liquids
F2	12’	9’ 6”	4’	10	Triple	Non-Regulated solids and Liquids
F3	NA	NA	NA	0	Double	Lab Packs
F7	11’ 10”	9’ 4”	4’	11	Triple	Lab Packs

Note: Additional storage space is utilized at the end of the racks and/or along the wall separating each warehouse (i.e., the wall between Warehouses C and D).

ACT will conduct weekly inspection of areas where wastes are stored at the Facility with secondary containment. These inspections will include checking impervious coating and looking for cracks, gaps, leaks, spills, and accumulated precipitation in the secondary containment system.

Pursuant to 40 CFR § 264.35 inspections shall include checking for adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. Additional information regarding inspection, along with inspection forms, is included in Permit Attachment E (Inspection Plan).

A.6.4 Management of Hazardous Waste Containers

Facility personnel shall use material handling equipment such as powered industrial trucks, pallet jacks, drum dollies to move hazardous waste containers in the Facility. Containers of hazardous waste shall be kept closed during storage, except when it is necessary to add or remove waste, in order to minimize air emissions. Furthermore, containers shall not be opened, handled, or stored in a manner that may rupture a container or cause it to leak.

A.6.5 Non-Bulk Containers

Non-bulk packaging means packaging that meets the following:

- It has a maximum capacity of 119 gallons (450 L) or less as a receptacle for a liquid.
- It has a maximum net mass of 882 pounds (400 kg) or less and a maximum capacity of 119 gallons (450 L) or less as a receptacle for a solid.
- A water capacity of 1000 pounds (454 kg/125 gallons) or less as a receptacle for a gas as defined in 49 CFR §173.115; or
- Has a maximum net mass of 400 kg (882 pounds/110 gallons) or less for a bag or a box conforming to the applicable requirements for specification packaging, including the maximum net mass limitations provided in 40 CFR Part 178, Subpart L.

A.6.6 Intermediate Bulk Containers

Intermediate bulk container (IBC) means rigid or flexible portable packaging, other than a cylinder or portable tank, which is designed for mechanical handling. Standards for IBCs manufactured in the United States are set forth in 49 CFR Part 178, Subparts N and O.

A.6.7 Large Packaging

Large packaging is defined as a packaging that:

- Consists of an outer packaging that contains articles or inner packaging.
- Is designated for mechanical handling.
- Exceeds 400 kg net mass or 450 liters (118.9 gallons) capacity.
- Has a volume of not more than 3 cubic meters; and
- Conforms to the requirements for the construction, testing and marking of large packaging as specified in 49 CFR Part 178, Subparts P and Q.

A.6.8 Bulk Containers

Bulk packaging means packaging, other than a vessel or a barge, including a transport vehicle or freight container, in which hazardous materials are loaded with no intermediate form of

containment. A large Packaging in which hazardous materials are loaded with an intermediate form of containment, such as one or more articles or inner packaging, is also a bulk packaging. Additionally, a bulk packaging has:

- A maximum capacity greater than 450 L (119 gallons) as a receptacle for a liquid.
- A maximum net mass greater than 400 kg (882 pounds) and a maximum capacity greater than 450 L (119 gallons) as a receptacle for a solid; or
- A water capacity greater than 454 kg (1000 pounds) as a receptacle for a gas as defined in 49 CFR §173.115.

A.6.9 Universal Waste Lamp Boxes

Universal Waste lamps shall always be managed in strong outer packaging. Strong outer packaging means the outermost enclosure that provides protection against the unintentional release of its contents. The strong outer packaging is a packaging that is sturdy, durable, and constructed so that it will retain its contents under normal conditions of transportation. In addition, a strong outer packaging must meet the general packaging requirements of 49 CFR Part 173. Universal Waste lamps may also be shipped in the original commercial packaging.

A.7 SECONDARY CONTAINMENT AND DETECTION OF RELEASES

A.7.1 Secondary Containment

All floors in storage areas A, B, C and D are recessed four inches below the concrete stem wall and storage areas E and F are recessed six inches below the stem wall. The concrete is sealed, and the expansion joints are caulked to prevent possible contamination of the soil should a spill occur. The capacity of the secondary containment system is at least 10% of the volume of the containers stored there.

In storage areas A, B, C, E and F, the floors are sloped away from the storage bays towards the aisles. Storage Area D is divided into six bays which are each sloped to drains situated in the center of the bay. The drains lead to a 500-gallon cement tank behind the building under the dock. This tank is housed in another cement watertight tank which has a volume of 3,790 gallons. Both tanks have removable vented lids to allow for visual inspection and removal of any spilled or leaked waste.

As required by 40 CFR § 264.175(b), the base containment system is sealed with an epoxy coating, is free of cracks or gaps, and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed. The base of the containment system is sloped and is designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation. The containment system has enough capacity to contain 10% of the volume of containers. No run-on enters into the containment system as it is entirely covered and is indoors. Spilled or leaked waste will be removed from the sump or collection area as soon as possible to prevent overflow of the collection system.

Adequate secondary containment is provided for all the storage areas, and the entire facility is concreted with berms to prevent runoff from the facility. Figure 7, Permit Attachment M (Figures) shows the secondary containment system and berms at the Facility.

A.8 PREVENTIVE MEASURES

The Facility is operated using a variety of procedures and equipment that minimize the potential for various hazards. The number one priority at ACT hazardous waste management center is the protection of the employees and the environment.

A.8.1 Prevention of Hazards During Unloading

Unloading hazards are reduced through procedures, structural features and equipment used at the ACT facility. Containerized wastes are unloaded and loaded only at the truck dock which is equipped with mechanical dock levelers. All wastes that enter or leave the Facility are handled over the sloped and drained concrete of the loading dock. Small trucks drive over the berm onto the dock from the east. Longer trucks back up to the dock, parking on the sloped and bermed concrete apron to the south. Both areas can contain a 1,000-gallon spill.

ACT maintains hand trucks and safety-rated forklifts specifically designed for carrying hazardous waste containers. Containers need not be lifted more than a few inches above the bed of a trailer before the forklift can back away and lower the containers to a few inches above the floor of the loading dock. In this way, if a container were to be dropped, the distance of the fall would be minimized so that the structural integrity of the container would not be threatened.

A.8.2 Prevention of Flooding (Run-On) and Run-Off from Waste Handling Areas

Flooding of the hazardous waste storage building is prevented by the land under the building being elevated five feet above the surrounding land. This allows any rain that might land near the building to flow away from, instead of towards, the building. Also, the building's roof is sloped and is equipped with a gutter system which allows the rainwater to flow from the facility in a southwesterly direction into the catchment ponds.

Prevention of run-off from the waste handling areas is accomplished in several ways. The storage area for the hazardous waste is situated inside the building over sealed concrete floors that are sloped and bermed, so that in the event of a spill or other release the material is contained inside the building. Floors in storage area/building D of the building are sloped and drained to a waste containment tank located under the dock. All other waste handling areas such as the docks are paved with concrete and built with swales which provide secondary containment.

A.8.3 Prevention of Water Supply Contamination

All the measures discussed in the section above help to decrease the chance of contamination of the water supply. All waste handling is performed over concrete and any spills or leaks that do occur are cleaned up immediately. Also, the road around the building slopes to the west so that

rainwater flows into the drainage ponds behind the building. This prevents the mixing of rainwater and any potential contamination from trucks at the dock.

A.8.4 Mitigation of Effects of Equipment Failures and/or Power Outage

Power outages and equipment failures do not create problems in the Facility for the following reasons:

- The storage section of the ACT facility is lighted only by skylights. The docks are equipped with explosion-proof electrical lighting. The forklifts are equipped with floodlights which allow for their safe use in the dark.

- In an emergency, pull stations would be operable since the electronic alarm system is battery powered. Shouting would be the most effective means of warning employees to evacuate since the intercom will not work during a power outage.

- Emergency exit signs are self-illuminating and visible without electric power.

However, should power outage occur, all operations at the facility will cease until power is restored.

A.8.5 Prevention of Undue Exposure of Personnel to Hazardous Waste

Training is the key to the prevention of employee exposure. All personnel at the ACT facility are trained in procedures for properly performing facility operations including handling hazardous wastes and responding to emergency situations. Included in the training is instruction in the use and care of personal protective equipment and the location and use of safety showers and eyewash units which are located at strategic points throughout the hazardous waste management Facility.

All employees are provided with protective equipment which includes, but is not limited to, hard hats, eye protection, steeled-toed boots, respirators, protective overalls, and chemically resistant aprons. Employees and all visitors are required to wear eye protection in the warehouse, on the docks and in the yard at all times. Hardhats are required to be worn in the warehouse. When transferring wastes or cleaning up hazardous waste spills, the worker(s) must wear the appropriate personal protective equipment.

A.8.6 Prevention of Releases to the Atmosphere

In addition to the precautions taken at the facility to prevent releases, procedures are implemented before the waste is transported to the facility. Before loading the containers of waste at a generator's facility, the containers are checked for soundness, proper closure and labeling, and compliance with DOT standards. Any damaged containers that might leak or burst during transportation or unloading are not accepted for transportation.

In the event of a leak or spill in the combustible storage area D, the waste would be drained from the warehouse through cast-iron pipe that leads to a watertight concrete-lined tank. This 500-

gallon concrete tank is housed in a larger watertight concrete tank. Drainage into the tank allows very few vapors to be emitted into the atmosphere.

A.8.7 Prevention of Accidental Ignition or Reaction of Ignitable, Reactive or Incompatible Wastes

The ACT treatment and storage facility has a combination of building design and procedural measures to prevent the accidental ignition or reaction of ignitable, reactive or incompatible wastes. The first precaution taken is to ensure that the hazardous waste received is what is described on the generator's profile and the manifest accompanying the waste so that it can be stored properly. The procedures to accomplish this are described in Permit Attachment C (Waste Analysis Plan).

A.8.7.1 Segregation of Incompatible Wastes

In order to decrease hazards caused by storing incompatible wastes, the building is designed to allow physical separation and secondary containment of incompatible materials. Additionally, the storage portion of the Facility is separated into six rooms by stem walls and cinderblock walls. Each area has sloped floors to contain any material within that area should a spill or leak occur. There are ramps in the entryways to the storage areas built into the curbs that keep any spilled or leaked waste within the storage areas.

Segregation of chemically incompatible waste is determined by the chemical composition and physical properties of the waste as described in Permit Attachment C, Waste Analysis Plan (WAP)) and in the manifest accompanying the waste. Profile information is verified when waste is received at the facility and the waste is placed into storage based on the RCRA waste code.

Routine inspections of containers and container storage areas are conducted to detect a spill or leak and to identify potential problems before they occur. In addition:

- All wastes are stored in containers made of or lined with materials that are compatible with the wastes in accordance with 40 CFR §264.172.

- Pursuant to 40 CFR §264.177(b), hazardous wastes will not be placed in an unwashed container that previously held an incompatible waste or material.

- While in storage, containers holding hazardous waste that are incompatible with any wastes or accumulated or stored nearby in other containers, will be separated from the other materials or protected from them by means of a dike, berm, wall, or other devices.

A.8.7.2 Segregation of Ignitable and Reactive Wastes

In order to decrease hazards caused by storing ignitable and reactive wastes, the building is designed to allow physical separation and secondary containment of ignitable and reactive wastes. The storage portion of the Facility is separated into six rooms by stem walls and cinderblock walls that contain any waste within that area, should a spill or leak occur. There are ramps in the

entryways to the storage areas built into the curbs that keep any spilled or leaked waste within the storage areas.

Ignitable or reactive wastes are segregated to protect them from sources of ignition or reaction such as open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (e.g., static, electrical, mechanical), spontaneous ignition, and radiant heat. ACT will eliminate sources of ignition by the following means:

- Containers of ignitable wastes are stored in designated areas, away from electrical equipment.

- Electrical outlets are not located in the areas where these wastes are stored. The rooms are lit by sunlight coming through skylights in the roof, Warehouses A & B are temperature controlled, otherwise there are no heating systems in the warehouse areas.

- All wiring and electrical equipment used around the waste storage areas (such as in the temperature control rooms and, on the docks,) is explosion proof. Forklifts are designed and rated to prevent ignition of flammable vapors.
- Pursuant to 40 CFR §264.17(a), smoking, and use of matches or lighters are not permitted anywhere in the Facility. "NO SMOKING" signs are posted at all entrances to the waste storage and handling areas, on Facility perimeter fencing and other prominent places throughout the Facility.

- Welding, cutting and other high temperature operations are not allowed near the vicinity of the waste storage and handling areas unless proper precautions and planning are done to ensure that ignitable wastes are not present at the work location, and the work is approved in advance by Facility Compliance personnel.

- Personnel use only non-sparking tools when managing open containers of hazardous waste that contain ignitable or reactive wastes, and when opening or closing such containers.

- When flammable or reactive liquids are transferred from one container to another (for conductive containers), grounding procedures or equivalent methods shall be used to minimize or dissipate static electric charge.

Containers holding ignitable or reactive wastes are located at least 15 meters (50 feet) from the Facility property boundary in accordance with 40 CFR §264.176. The Facility storage warehouses are marked on the floors indicating the 50-foot boundary. No reactive or ignitable wastes are stored beyond these marks indicating the 50-foot boundary.

- These requirements are applicable to the roll-off bin, which is a container. Once consolidation of a load is complete, the roll-off container will be transported within 24 hours for disposal or will be moved to one of the loading dock slots for storage.

- All loading dock slots are at least 50 feet from the property line.

ACT will take precautions during the treatment (via consolidation) or storage of ignitable or reactive waste, the mixing of incompatible waste, or the mixing of incompatible wastes and other materials to prevent reactions that could lead to or cause the following:

1. Generation of extreme heat, pressure, fire, explosions, or violent reactions.
2. Production of uncontrolled toxic mist, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment.
3. Production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions.
4. Damage to the structural integrity of a container or Facility.

5. Threat to human health or the environment through other like means.

Water-reactive wastes will be stored in combination packaging with water resistant outer packaging such as polyethylene or metal drums. Exemption boxes (i.e., SP-11248) may also be used to store water reactive material providing the requirements of the special provision are met. Water reactive material will only be consolidated into combination packages so the material will always be within an inner container with a water-resistant outer container. When water reactive materials are consolidated, the outer containers will remain closed until the inner containers are to be consolidated to minimize possible exposure.

Containerized hazardous waste is stored only in closed DOT approved containers. These containers are not opened unless sampling or repackaging is necessary. Opening of containers is strictly prohibited in the storage areas. Sampling and transfer operations are prohibited inside the warehouse building unless there is positive local ventilation to the outside. Generally, these operations shall be conducted on the docks.

The storage areas for the containers are inside the building in rooms A, B, C, D, E, and F. This allows protection of the waste from extreme heat, cold, and sunlight.

A.9 SECURITY MEASURES

A.9.1 24-Hour Surveillance System and/or Artificial or Natural Barriers

The ACT facility employs several measures to prevent and minimize the unknowing and unauthorized entry of persons or livestock onto the Facility.

The Facility has a security alarm system that is connected to the front facility windows, motion detections in the hallways, and door of the warehouse rooms, the fire sprinkler system, and the pull stations. This monitoring system is manned 24 hours a day by an outside security company. A list of Facility employee names and their contact phone numbers is kept at this monitoring company in the event that an emergency or unauthorized intrusion occurs.

Additionally, a fence, maintained in good repair, encompasses the entire Facility. The fence is constructed of 6-foot-high, chain link fence. The fence, with locking gates and security alarm system provide controlled access to prevent entry of unauthorized persons or livestock.

All gates are maintained in a closed and locked condition during non-working hours. All critical locks and the alarm codes are changed when a Facility employee leaves the company or when a key is lost. During working hours, all gates are kept closed or, when open, are monitored by Facility personnel. Access through the loading/unloading gate is blocked by a barrier with a sign informing waste transporters to check in with the office before entering. Facility personnel inside the office will confirm identification of all visitors and the purpose of their visit. Visitors are not allowed in the warehouse without a Facility employee accompanying them. All visitors are required to sign a visitor's log prior to their movement in or around the Facility. The Facility escort is responsible for ensuring that all visitors comply with these requirements.

A.9.2 Warning Signs

Warning signs are posted at the Facility gates and at other fence locations around the warehouse in such a manner as to be visible from all angles of approach. The warning signs are posted typically every 50 feet along the perimeter fence of the Facility. The signs are legible from a distance of at least 25 feet and read: "DANGER - UNAUTHORIZED PERSONS KEEP OUT". Warning signs in Spanish are also posted next to the warning signs in English language and read: "PELIGRO - PERSONAS SIN AUTORIZACION NO ENTRADA."

A.9.3 Building Access

The office/warehouse buildings are secured with locks on all doors and warning signs are posted at entrances to work and waste storage areas. The waste management storage units are accessible only to ACT employees.

A.10 RCRA SUBPART CC AIR EMISSIONS COMPLIANCE PLAN

The 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, and the requirements of Permit Part 3, Section 3.8 (Air Emissions).

The following sections contain a description of the Facility's waste determination procedures, tank and container design/management practices, organic emission controls, inspection, monitoring, recordkeeping and reporting, pursuant to requirements/standards promulgated under RCRA Subpart CC.

A.10.1 Waste Determination Procedures

For purposes of waste determination, this facility utilizes knowledge developed in the Waste Characterization described in Permit Attachment C (Waste Analysis Plan). For 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 Permittee 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_w 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.

A.10.2 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 Facility.

The drum washing unit at this facility is ancillary equipment to the tank. This unit is kept closed except when adding or removing wastes, sampling, or performing routine maintenance that requires the lid to be open.

A.10.3 Description of Containers

Containers managing hazardous wastes generally fall into three categories.

1. Those hazardous waste containers that are less than 26 gallons in capacity are exempt from consideration under Subpart CC. ACT manages waste with vapor pressures greater than 0.3 kPa at 20°C both in containers less than 0.1 m^3 (about 26 gallons) and in containers greater than 0.46 m^3 (or about 122 gallons). Containers of hazardous 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 gallons and 122 gallons are all Level 1 containers and generally meet the Level 1 standards as covered containers designed with no gaps, holes, cracks, or other open spaces into the container. In addition, all ACT containers used to manage hazardous waste must meet applicable U.S. DOT regulations on packaging hazardous materials for transportation.

3. Containers of capacity greater than 122 gallons that manage hazardous wastes at this facility are not in light service (i.e., containers greater than 122 gallons are not used to manage wastes with vapor pressures greater than 0.3 kPa at 20°C). Containers greater than 122 gallons are Level 1 covered containers designed and operated with no gaps, holes, cracks, or other open spaces into the container and comply with applicable U.S. DOT regulations on packaging hazardous wastes for transportation.

A hazardous waste is a "light material" if it (1) contains at least one organic constituent with a vapor pressure above 0.3 (kPa) at 20°C, and (2) has a total concentration of such constituents of 20% or greater by weight. This definition will generally apply to all hazardous waste received at the facility in non-bulk containers.

A.10.4 Level 1 Containers

The Table below is a summary of the criteria applicable for a container to be identified and managed as a Level 1 container at the ACT Facility.

LEVEL	VOLUME	USAGE	REQUIREMENTS
Level 1	> 26 gallons but ≤ 119 gallons OR >119 gallons	Any hazardous waste Not "in light material service"	- Meet DOT specs or is a lab pack - Keep closed except when adding or removing waste - Safety relief devices - Minimize exposure of waste when transferring, - Remediate defective containers within 5 days, initiate within 24 hours

Level 1 containers that are received and managed by this Facility include, but are not limited to, 5-gallon, 15-gallon, 30-gallon, 55-gallon, or 275-gallon containers. These containers meet applicable DOT specifications and/or authorizations. Therefore, these containers are acceptable for use in accordance with Level 1 controls. Containers greater than 26 gallons managing site generated hazardous waste will be visually inspected upon their initial filling and within one year if the container is not completely emptied of its contents.

A.10.5 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 presented in Permit Attachment E (Inspection Plan). Visual tank inspections shall be conducted on an annual basis and per inspection schedule contained in Permit Attachment E (Inspection Plan).

A.10.6 Recordkeeping

Documentation of waste determination: For purposes of waste determination, this facility utilizes process knowledge of the wastes described in Permit Attachment C (Waste Analysis Plan). For those hazardous wastes which are managed on a transfer basis, the Subpart CC regulations do not apply. However, the owner/operator of this Facility may use knowledge of the waste based on information included in manifests, publications, 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_w at the point of waste origination. Therefore, hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

PERMIT ATTACHMENT B AUTHORIZED WASTES

B.1 INTRODUCTION

This Permit Attachment authorizes the types and quantities of waste that the Permittee is allowed to accept, manage, treat, and store at the Facility.

B.2 AUTHORIZED WASTES FOR STORAGE IN CONTAINERS AND TANKS AT THE FACILITY

Item 7 in the EPA's Hazardous Waste Permit Part A Form below contains a list of the waste that the Permittee is authorized to manage, treat, and store in containers and tanks at the facility. Additional requirements are presented in Permit Part 3 (Storage of Hazardous Waste in Containers) and Permit Part 4 (Treatment of Hazardous Waste in Containers).

The Part A Permit Application below contains the list and descriptions of the types of hazardous waste the Permittee may manage, treat, and store at the Container Treatment and Storage Facility.

Docusign Envelope ID: 477E653A-04FD-4499-80E5-6DD1C4BD10B5

EPA ID Number	N	M	D	0	0	2	2	0	8	6	2	7

OMB# 2050-0024; Expires 08/31/2028

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	REBECCA	MI	M	Last Name	HOGABOAM
Title	AREA ENVIRONMENTAL COMPLIANCE MANAGER				
Email	RHOGABOAM@REPUBLICSERVICES.COM				
Phone	(208) 598-9992	Ext	N/A	Fax	N/A

2. Facility Permit Contact Mailing Address

Street Address	101 S CAPITOL BLVD, STE 1000	
City, Town, or Village	BOISE	
State ID	Country U.S.A.	Zip Code 83702

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

1/1/1987

4. Other Environmental Permits

A. Permit Type	B. Permit Number													C. Description
E	N	M	0	0	0	0	2	3	8	5				SOURCE REGISTRATION - FACILITY ID: F

5. Nature of Business

Advanced Chemical Treatment LLC (ACT Treatment) utilizes the facility to accept, manage, store, consolidate, and treat hazardous wastes under RCRA's regulations.

Docusign Envelope ID: 477E653A-04FD-4499-80E5-6DD1C4BD10B5

EPA ID Number | N | M | D | 0 | 0 | 2 | 2 | 0 | 8 | 6 | 2 | 7 | OMB# 2050-0024; Expires 08/31/2028

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity (1) Amount	B. Process Design Capacity (2) Unit of Measure	C. Process Total Number of Units	D. Unit Name
0	1	S	0	1	11,000	G	1	WAREHOUSE A
0	2	S	0	1	11,000	G	1	WAREHOUSE B
0	3	S	0	1	59,400	G	1	WAREHOUSE C
0	4	S	0	1	55,550	G	1	WAREHOUSE D
								See continuation pgs

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

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

8. Map

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

9. Facility Drawing

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

10. Photographs

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

11. Comments

SEE ATTACHED

Reproduction of Form Approved OMB No. 2050-0024

EPA ID NUMBER NMD002208627

6. PROCESS CODES AND DESIGN CAPACITIES (CONTINUED)

LINE NUMBER	A. PROCESS CODE	B. PROCESS DESIGN CAPACITY (1) AMOUNT	B. PROCESS DESIGN CAPACITY (2) UNIT OF MEASURE	C. PROCESS TOTAL NUMBER OF UNITS	D. UNIT NAME
05	S01	71,500.00	G	1	WAREHOUSE E
06	S01	70,950.00	G	1	WAREHOUSE F
07	T04	5,500.00	U	1	FUEL AND WASTE CONSOLIDATION AREA

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)

LINE NO.	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 7.D(1))
1	D001	22,094,600	G	S01	
2	D002	8,300,000	G	S01	
3	D003	8,300,000	G	S01	
4	D004	415,000	G	S01	
5	D005	415,000	G	S01	
6	D006	415,000	G	S01	
7	D007	415,000	G	S01	
8	D008	415,000	G	S01	
9	D009	415,000	G	S01	
10	D010	415,000	G	S01	
11	D011	415,000	G	S01	
12	D012	415,000	G	S01	
13	D013	415,000	G	S01	
14	D014	415,000	G	S01	
15	D015	415,000	G	S01	
16	D016	415,000	G	S01	
17	D017	415,000	G	S01	
18	D018	415,000	G	S01	
19	D019	415,000	G	S01	
20	D020	415,000	G	S01	
21	D021	2,788,800	G	S01	
22	D022	564,400	G	S01	
23	D023	415,000	G	S01	
24	D024	415,000	G	S01	
25	D025	415,000	G	S01	
26	D026	415,000	G	S01	
27	D027	415,000	G	S01	
28	D028	6,125,400	G	S01	
29	D029	415,000	G	S01	
30	D030	415,000	G	S01	
31	D031	415,000	G	S01	
32	D032	415,000	G	S01	
33	D033	415,000	G	S01	
34	D034	415,000	G	S01	
35	D035	415,000	G	S01	
36	D036	415,000	G	S01	
37	D037	415,000	G	S01	
38	D038	415,000	G	S01	
39	D039	415,000	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
40	D040	415,000	G	S01	
41	D041	415,000	G	S01	
42	D042	415,000	G	S01	
43	D043	415,000	G	S01	
44	F001	18,260,000	G	S01	
45	F002	18,260,000	G	S01	
46	F003	18,260,000	G	S01	
47	F004	8,300,000	G	S01	
48	F005	9,545,000	G	S01	
49	F006	415,000	G	S01	
50	F007	415,000	G	S01	
51	F008	415,000	G	S01	
52	F009	415,000	G	S01	
53	F010	415,000	G	S01	
54	F011	415,000	G	S01	
55	F012	415,000	G	S01	
56	F019	415,000	G	S01	
57	F020	33,200	G	S01	
58	F021	33,200	G	S01	
59	F022	33,200	G	S01	
60	F023	33,200	G	S01	
61	F024	415,000	G	S01	
62	F025	415,000	G	S01	
63	F026	33,200	G	S01	
64	F027	33,200	G	S01	
65	F028	33,200	G	S01	
66	F032	415,000	G	S01	
67	F034	415,000	G	S01	
68	F035	415,000	G	S01	
69	F037	647,400	G	S01	
70	F038	415,000	G	S01	
71	F039	415,000	G	S01	
72	K001	415,000	G	S01	
73	K002	415,000	G	S01	
74	K003	415,000	G	S01	
75	K004	415,000	G	S01	
76	K005	415,000	G	S01	
77	K006	415,000	G	S01	
78	K007	415,000	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)

LINE NO.	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 7.D(1))
79	K008	415,000	G	S01	
80	K009	415,000	G	S01	
81	K010	415,000	G	S01	
82	K011	415,000	G	S01	
83	K013	415,000	G	S01	
84	K014	415,000	G	S01	
85	K015	415,000	G	S01	
86	K016	415,000	G	S01	
87	K017	415,000	G	S01	
88	K018	415,000	G	S01	
89	K019	415,000	G	S01	
90	K020	415,000	G	S01	
91	K021	415,000	G	S01	
92	K022	415,000	G	S01	
93	K023	415,000	G	S01	
94	K024	415,000	G	S01	
95	K025	415,000	G	S01	
96	K026	415,000	G	S01	
97	K027	415,000	G	S01	
98	K028	415,000	G	S01	
99	K029	415,000	G	S01	
100	K030	415,000	G	S01	
101	K031	415,000	G	S01	
102	K032	415,000	G	S01	
103	K033	415,000	G	S01	
104	K034	415,000	G	S01	
105	K035	415,000	G	S01	
106	K036	415,000	G	S01	
107	K037	415,000	G	S01	
108	K038	415,000	G	S01	
109	K039	415,000	G	S01	
110	K040	415,000	G	S01	
111	K041	415,000	G	S01	
112	K042	415,000	G	S01	
113	K043	415,000	G	S01	
114	K044	415,000	G	S01	
115	K045	415,000	G	S01	
116	K046	415,000	G	S01	
117	K047	415,000	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)

LINE NO.	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 7.D(1))
118	K048	415,000	G	S01	
119	K049	415,000	G	S01	
120	K050	415,000	G	S01	
121	K051	415,000	G	S01	
122	K052	415,000	G	S01	
123	K060	415,000	G	S01	
124	K061	415,000	G	S01	
125	K062	415,000	G	S01	
126	K069	415,000	G	S01	
127	K071	415,000	G	S01	
128	K073	415,000	G	S01	
129	K083	415,000	G	S01	
130	K084	415,000	G	S01	
131	K085	415,000	G	S01	
132	K086	415,000	G	S01	
133	K087	415,000	G	S01	
134	K088	415,000	G	S01	
135	K093	415,000	G	S01	
136	K094	415,000	G	S01	
137	K095	415,000	G	S01	
138	K096	415,000	G	S01	
139	K097	415,000	G	S01	
140	K098	415,000	G	S01	
141	K099	415,000	G	S01	
142	K100	415,000	G	S01	
143	K101	415,000	G	S01	
144	K102	415,000	G	S01	
145	K103	415,000	G	S01	
146	K104	415,000	G	S01	
147	K105	415,000	G	S01	
148	K106	415,000	G	S01	
149	K107	415,000	G	S01	
150	K108	415,000	G	S01	
151	K109	415,000	G	S01	
152	K110	415,000	G	S01	
153	K111	415,000	G	S01	
154	K112	415,000	G	S01	
155	K113	415,000	G	S01	
156	K114	415,000	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)

LINE NO.	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 7.D(1))
157	K115	415,000	G	S01	
158	K116	415,000	G	S01	
159	K117	415,000	G	S01	
160	K118	415,000	G	S01	
161	K123	415,000	G	S01	
162	K124	415,000	G	S01	
163	K125	415,000	G	S01	
164	K126	415,000	G	S01	
165	K131	415,000	G	S01	
166	K132	415,000	G	S01	
167	K136	415,000	G	S01	
168	K141	415,000	G	S01	
169	K142	415,000	G	S01	
170	K143	415,000	G	S01	
171	K144	415,000	G	S01	
172	K145	415,000	G	S01	
173	K147	415,000	G	S01	
174	K148	415,000	G	S01	
175	K149	415,000	G	S01	
176	K150	415,000	G	S01	
177	K151	415,000	G	S01	
178	K156	415,000	G	S01	
179	K157	415,000	G	S01	
180	K158	415,000	G	S01	
181	K159	415,000	G	S01	
182	K161	415,000	G	S01	
183	K171	415,000	G	S01	
184	K172	415,000	G	S01	
185	K174	415,000	G	S01	
186	K176	415,000	G	S01	
187	K177	415,000	G	S01	
188	K178	415,000	G	S01	
189	P001	33,200	G	S01	
190	P002	33,200	G	S01	
191	P003	33,200	G	S01	
192	P004	33,200	G	S01	
193	P005	33,200	G	S01	
194	P006	33,200	G	S01	
195	P007	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
196	P008	33,200	G	S01	
197	P009	33,200	G	S01	
198	P010	33,200	G	S01	
199	P011	33,200	G	S01	
200	P012	33,200	G	S01	
201	P013	33,200	G	S01	
202	P014	33,200	G	S01	
203	P015	33,200	G	S01	
204	P016	33,200	G	S01	
205	P017	33,200	G	S01	
206	P018	33,200	G	S01	
207	P020	33,200	G	S01	
208	P021	33,200	G	S01	
209	P022	33,200	G	S01	
210	P023	33,200	G	S01	
211	P024	33,200	G	S01	
212	P026	33,200	G	S01	
213	P027	33,200	G	S01	
214	P028	33,200	G	S01	
215	P029	33,200	G	S01	
216	P030	33,200	G	S01	
217	P031	33,200	G	S01	
218	P033	33,200	G	S01	
219	P034	33,200	G	S01	
220	P036	33,200	G	S01	
221	P037	33,200	G	S01	
222	P038	33,200	G	S01	
223	P039	33,200	G	S01	
224	P040	33,200	G	S01	
225	P041	33,200	G	S01	
226	P042	33,200	G	S01	
227	P043	33,200	G	S01	
228	P044	33,200	G	S01	
229	P045	33,200	G	S01	
230	P046	33,200	G	S01	
231	P047	33,200	G	S01	
232	P048	33,200	G	S01	
233	P049	33,200	G	S01	
234	P050	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
235	P051	33,200	G	S01	
236	P054	33,200	G	S01	
237	P056	33,200	G	S01	
238	P057	33,200	G	S01	
239	P058	33,200	G	S01	
240	P059	33,200	G	S01	
241	P060	33,200	G	S01	
242	P062	33,200	G	S01	
243	P063	33,200	G	S01	
244	P064	33,200	G	S01	
245	P065	33,200	G	S01	
246	P066	33,200	G	S01	
247	P067	33,200	G	S01	
248	P068	33,200	G	S01	
249	P069	33,200	G	S01	
250	P070	33,200	G	S01	
251	P071	33,200	G	S01	
252	P072	33,200	G	S01	
253	P073	33,200	G	S01	
254	P074	33,200	G	S01	
255	P075	33,200	G	S01	
256	P076	33,200	G	S01	
257	P077	33,200	G	S01	
258	P078	33,200	G	S01	
259	P081	33,200	G	S01	
260	P082	33,200	G	S01	
261	P084	33,200	G	S01	
262	P085	33,200	G	S01	
263	P087	33,200	G	S01	
264	P088	33,200	G	S01	
265	P089	33,200	G	S01	
266	P092	33,200	G	S01	
267	P093	33,200	G	S01	
268	P094	33,200	G	S01	
269	P095	33,200	G	S01	
270	P096	33,200	G	S01	
271	P097	33,200	G	S01	
272	P098	33,200	G	S01	
273	P099	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)

LINE NO.	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 7.D(1))
274	P101	33,200	G	S01	
275	P102	33,200	G	S01	
276	P103	33,200	G	S01	
277	P104	33,200	G	S01	
278	P105	33,200	G	S01	
279	P106	33,200	G	S01	
280	P108	33,200	G	S01	
281	P109	33,200	G	S01	
282	P110	33,200	G	S01	
283	P111	33,200	G	S01	
284	P112	33,200	G	S01	
285	P113	33,200	G	S01	
286	P114	33,200	G	S01	
287	P115	33,200	G	S01	
288	P116	33,200	G	S01	
289	P118	33,200	G	S01	
290	P119	33,200	G	S01	
291	P120	33,200	G	S01	
292	P121	33,200	G	S01	
293	P122	33,200	G	S01	
294	P123	33,200	G	S01	
295	P127	33,200	G	S01	
296	P128	33,200	G	S01	
297	P185	33,200	G	S01	
298	P188	33,200	G	S01	
299	P189	33,200	G	S01	
300	P190	33,200	G	S01	
301	P191	33,200	G	S01	
302	P192	33,200	G	S01	
303	P194	33,200	G	S01	
304	P196	33,200	G	S01	
305	P197	33,200	G	S01	
306	P198	33,200	G	S01	
307	P199	33,200	G	S01	
308	P201	33,200	G	S01	
309	P202	33,200	G	S01	
310	P203	33,200	G	S01	
311	P204	33,200	G	S01	
312	P205	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
313	U001	33,200	G	S01	
314	U002	33,200	G	S01	
315	U003	33,200	G	S01	
316	U004	33,200	G	S01	
317	U005	33,200	G	S01	
318	U006	33,200	G	S01	
319	U007	33,200	G	S01	
320	U008	33,200	G	S01	
321	U009	33,200	G	S01	
322	U010	33,200	G	S01	
323	U011	33,200	G	S01	
324	U012	33,200	G	S01	
325	U014	33,200	G	S01	
326	U015	33,200	G	S01	
327	U016	33,200	G	S01	
328	U017	33,200	G	S01	
329	U018	33,200	G	S01	
330	U019	33,200	G	S01	
331	U020	33,200	G	S01	
332	U021	33,200	G	S01	
333	U022	33,200	G	S01	
334	U023	33,200	G	S01	
335	U024	33,200	G	S01	
336	U025	33,200	G	S01	
337	U026	33,200	G	S01	
338	U027	33,200	G	S01	
339	U028	33,200	G	S01	
340	U029	33,200	G	S01	
341	U030	33,200	G	S01	
342	U031	33,200	G	S01	
343	U032	33,200	G	S01	
344	U033	33,200	G	S01	
345	U034	33,200	G	S01	
346	U035	33,200	G	S01	
347	U036	33,200	G	S01	
348	U037	33,200	G	S01	
349	U038	33,200	G	S01	
350	U039	33,200	G	S01	
351	U041	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
352	U042	33,200	G	S01	
353	U043	33,200	G	S01	
354	U044	33,200	G	S01	
355	U045	33,200	G	S01	
356	U046	33,200	G	S01	
357	U047	33,200	G	S01	
358	U048	33,200	G	S01	
359	U049	33,200	G	S01	
360	U050	33,200	G	S01	
361	U051	33,200	G	S01	
362	U052	33,200	G	S01	
363	U053	33,200	G	S01	
364	U055	33,200	G	S01	
365	U056	33,200	G	S01	
366	U057	33,200	G	S01	
367	U058	33,200	G	S01	
368	U059	33,200	G	S01	
369	U060	33,200	G	S01	
370	U061	33,200	G	S01	
371	U062	33,200	G	S01	
372	U063	33,200	G	S01	
373	U064	33,200	G	S01	
374	U066	33,200	G	S01	
375	U067	33,200	G	S01	
376	U068	33,200	G	S01	
377	U069	33,200	G	S01	
378	U070	33,200	G	S01	
379	U071	33,200	G	S01	
380	U072	33,200	G	S01	
381	U073	33,200	G	S01	
382	U074	33,200	G	S01	
383	U075	33,200	G	S01	
384	U076	33,200	G	S01	
385	U077	33,200	G	S01	
386	U078	33,200	G	S01	
387	U079	33,200	G	S01	
388	U080	33,200	G	S01	
389	U081	33,200	G	S01	
390	U082	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
391	U083	33,200	G	S01	
392	U084	33,200	G	S01	
393	U085	33,200	G	S01	
394	U086	33,200	G	S01	
395	U087	33,200	G	S01	
396	U088	33,200	G	S01	
397	U089	33,200	G	S01	
398	U090	33,200	G	S01	
399	U091	33,200	G	S01	
400	U092	33,200	G	S01	
401	U093	33,200	G	S01	
402	U094	33,200	G	S01	
403	U095	33,200	G	S01	
404	U096	33,200	G	S01	
405	U097	33,200	G	S01	
406	U098	33,200	G	S01	
407	U099	33,200	G	S01	
408	U101	33,200	G	S01	
409	U102	33,200	G	S01	
410	U103	33,200	G	S01	
411	U105	33,200	G	S01	
412	U106	33,200	G	S01	
413	U107	33,200	G	S01	
414	U108	33,200	G	S01	
415	U109	33,200	G	S01	
416	U110	33,200	G	S01	
417	U111	33,200	G	S01	
418	U112	33,200	G	S01	
419	U113	33,200	G	S01	
420	U114	33,200	G	S01	
421	U115	33,200	G	S01	
422	U116	33,200	G	S01	
423	U117	33,200	G	S01	
424	U118	33,200	G	S01	
425	U119	33,200	G	S01	
426	U120	33,200	G	S01	
427	U121	33,200	G	S01	
428	U122	33,200	G	S01	
429	U123	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
430	U124	33,200	G	S01	
431	U125	33,200	G	S01	
432	U126	33,200	G	S01	
433	U127	33,200	G	S01	
434	U128	33,200	G	S01	
435	U129	33,200	G	S01	
436	U130	33,200	G	S01	
437	U131	33,200	G	S01	
438	U132	33,200	G	S01	
439	U133	33,200	G	S01	
440	U134	33,200	G	S01	
441	U135	33,200	G	S01	
442	U136	33,200	G	S01	
443	U137	33,200	G	S01	
444	U138	33,200	G	S01	
445	U140	33,200	G	S01	
446	U141	33,200	G	S01	
447	U142	33,200	G	S01	
448	U143	33,200	G	S01	
449	U144	33,200	G	S01	
450	U145	33,200	G	S01	
451	U146	33,200	G	S01	
452	U147	33,200	G	S01	
453	U148	33,200	G	S01	
454	U149	33,200	G	S01	
455	U150	33,200	G	S01	
456	U151	33,200	G	S01	
457	U152	33,200	G	S01	
458	U153	33,200	G	S01	
459	U154	83,000	G	S01	
460	U155	33,200	G	S01	
461	U156	33,200	G	S01	
462	U157	33,200	G	S01	
463	U158	33,200	G	S01	
464	U159	33,200	G	S01	
465	U160	33,200	G	S01	
466	U161	33,200	G	S01	
467	U162	33,200	G	S01	
468	U163	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
469	U164	33,200	G	S01	
470	U165	33,200	G	S01	
471	U166	33,200	G	S01	
472	U167	33,200	G	S01	
473	U168	33,200	G	S01	
474	U169	33,200	G	S01	
475	U170	33,200	G	S01	
476	U171	33,200	G	S01	
477	U172	33,200	G	S01	
478	U173	33,200	G	S01	
479	U174	33,200	G	S01	
480	U176	33,200	G	S01	
481	U177	33,200	G	S01	
482	U178	33,200	G	S01	
483	U179	33,200	G	S01	
484	U180	33,200	G	S01	
485	U181	33,200	G	S01	
486	U182	33,200	G	S01	
487	U183	33,200	G	S01	
488	U184	33,200	G	S01	
489	U185	33,200	G	S01	
490	U186	33,200	G	S01	
491	U187	33,200	G	S01	
492	U188	33,200	G	S01	
493	U189	33,200	G	S01	
494	U190	33,200	G	S01	
495	U191	33,200	G	S01	
496	U192	33,200	G	S01	
497	U193	33,200	G	S01	
498	U194	33,200	G	S01	
499	U196	33,200	G	S01	
500	U197	33,200	G	S01	
501	U200	33,200	G	S01	
502	U201	33,200	G	S01	
503	U202	33,200	G	S01	
504	U203	33,200	G	S01	
505	U204	33,200	G	S01	
506	U205	33,200	G	S01	
507	U206	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
508	U207	33,200	G	S01	
509	U208	33,200	G	S01	
510	U209	33,200	G	S01	
511	U210	33,200	G	S01	
512	U211	33,200	G	S01	
513	U213	33,200	G	S01	
514	U214	33,200	G	S01	
515	U215	33,200	G	S01	
516	U216	33,200	G	S01	
517	U217	33,200	G	S01	
518	U218	33,200	G	S01	
519	U219	33,200	G	S01	
520	U220	33,200	G	S01	
521	U221	33,200	G	S01	
522	U222	33,200	G	S01	
523	U223	33,200	G	S01	
524	U225	33,200	G	S01	
525	U226	33,200	G	S01	
526	U227	33,200	G	S01	
527	U228	33,200	G	S01	
528	U234	33,200	G	S01	
529	U235	33,200	G	S01	
530	U236	33,200	G	S01	
531	U237	33,200	G	S01	
532	U238	33,200	G	S01	
533	U239	33,200	G	S01	
534	U240	33,200	G	S01	
535	U243	33,200	G	S01	
536	U244	33,200	G	S01	
537	U246	33,200	G	S01	
538	U247	33,200	G	S01	
539	U248	33,200	G	S01	
540	U249	33,200	G	S01	
541	U271	33,200	G	S01	
542	U278	33,200	G	S01	
543	U279	33,200	G	S01	
544	U280	33,200	G	S01	
545	U328	33,200	G	S01	
546	U353	33,200	G	S01	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
547	U359	33,200	G	S01	
548	U364	33,200	G	S01	
549	U367	33,200	G	S01	
550	U372	33,200	G	S01	
551	U373	33,200	G	S01	
552	U387	33,200	G	S01	
553	U389	33,200	G	S01	
554	U394	33,200	G	S01	
555	U395	33,200	G	S01	
556	U404	33,200	G	S01	
557	U409	33,200	G	S01	
558	U410	33,200	G	S01	
559	U411	33,200	G	S01	
560	D001	825,000	G	T04	
561	D004	825,000	G	T04	
562	D005	825,000	G	T04	
563	D006	825,000	G	T04	
564	D007	825,000	G	T04	
565	D008	825,000	G	T04	
566	D009	825,000	G	T04	
567	D010	825,000	G	T04	
568	D011	825,000	G	T04	
569	D018	825,000	G	T04	
570	D019	825,000	G	T04	
571	D021	825,000	G	T04	
572	D022	825,000	G	T04	
573	D023	825,000	G	T04	
574	D024	825,000	G	T04	
575	D025	825,000	G	T04	
576	D026	825,000	G	T04	
577	D027	825,000	G	T04	
578	D028	825,000	G	T04	
579	D029	825,000	G	T04	
580	D030	825,000	G	T04	
581	D032	825,000	G	T04	
582	D033	825,000	G	T04	
583	D035	825,000	G	T04	
584	D036	825,000	G	T04	
585	D037	825,000	G	T04	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)

LINE NO.	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 7.D(1))
586	D038	825,000	G	T04	
587	D039	825,000	G	T04	
588	D040	825,000	G	T04	
589	D041	825,000	G	T04	
590	D042	825,000	G	T04	
591	D043	825,000	G	T04	
592	F001	825,000	G	T04	
593	F002	825,000	G	T04	
594	F003	825,000	G	T04	
595	F004	825,000	G	T04	
596	F005	825,000	G	T04	
597	F006	825,000	G	T04	
598	F007	825,000	G	T04	
599	F008	825,000	G	T04	
600	F009	825,000	G	T04	
601	F010	825,000	G	T04	
602	F011	825,000	G	T04	
603	F012	825,000	G	T04	
604	F019	825,000	G	T04	
605	F024	825,000	G	T04	
606	F025	825,000	G	T04	
607	F032	825,000	G	T04	
608	F034	825,000	G	T04	
609	F035	825,000	G	T04	
610	F037	825,000	G	T04	
611	F038	825,000	G	T04	
612	F039	825,000	G	T04	
613	K001	825,000	G	T04	
614	K002	825,000	G	T04	
615	K003	825,000	G	T04	
616	K004	825,000	G	T04	
617	K005	825,000	G	T04	
618	K006	825,000	G	T04	
619	K007	825,000	G	T04	
620	K008	825,000	G	T04	
621	K009	825,000	G	T04	
622	K010	825,000	G	T04	
623	K011	825,000	G	T04	
624	K013	825,000	G	T04	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
625	K014	825,000	G	T04	
626	K015	825,000	G	T04	
627	K016	825,000	G	T04	
628	K017	825,000	G	T04	
629	K018	825,000	G	T04	
630	K019	825,000	G	T04	
631	K020	825,000	G	T04	
632	K021	825,000	G	T04	
633	K022	825,000	G	T04	
634	K023	825,000	G	T04	
635	K024	825,000	G	T04	
636	K025	825,000	G	T04	
637	K026	825,000	G	T04	
638	K027	825,000	G	T04	
639	K028	825,000	G	T04	
640	K029	825,000	G	T04	
641	K030	825,000	G	T04	
642	K048	825,000	G	T04	
643	K049	825,000	G	T04	
644	K050	825,000	G	T04	
645	K051	825,000	G	T04	
646	K052	825,000	G	T04	
647	K060	825,000	G	T04	
648	K061	825,000	G	T04	
649	K062	825,000	G	T04	
650	K069	825,000	G	T04	
651	K071	825,000	G	T04	
652	K073	825,000	G	T04	
653	K083	825,000	G	T04	
654	K084	825,000	G	T04	
655	K085	825,000	G	T04	
656	K086	825,000	G	T04	
657	K087	825,000	G	T04	
658	K088	825,000	G	T04	
659	K093	825,000	G	T04	
660	K094	825,000	G	T04	
661	K095	825,000	G	T04	
662	K096	825,000	G	T04	
663	K100	825,000	G	T04	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
664	K101	825,000	G	T04	
665	K102	825,000	G	T04	
666	K103	825,000	G	T04	
667	K104	825,000	G	T04	
668	K105	825,000	G	T04	
669	K106	825,000	G	T04	
670	K107	825,000	G	T04	
671	K108	825,000	G	T04	
672	K109	825,000	G	T04	
673	K110	825,000	G	T04	
674	K111	825,000	G	T04	
675	K112	825,000	G	T04	
676	K113	825,000	G	T04	
677	K114	825,000	G	T04	
678	K115	825,000	G	T04	
679	K116	825,000	G	T04	
680	K117	825,000	G	T04	
681	K118	825,000	G	T04	
682	K136	825,000	G	T04	
683	U001	825,000	G	T04	
684	U002	825,000	G	T04	
685	U003	825,000	G	T04	
686	U004	825,000	G	T04	
687	U005	825,000	G	T04	
688	U006	825,000	G	T04	
689	U007	825,000	G	T04	
690	U008	825,000	G	T04	
691	U009	825,000	G	T04	
692	U010	825,000	G	T04	
693	U011	825,000	G	T04	
694	U012	825,000	G	T04	
695	U014	825,000	G	T04	
696	U015	825,000	G	T04	
697	U016	825,000	G	T04	
698	U017	825,000	G	T04	
699	U018	825,000	G	T04	
700	U019	825,000	G	T04	
701	U021	825,000	G	T04	
702	U022	825,000	G	T04	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
703	U023	825,000	G	T04	
704	U024	825,000	G	T04	
705	U025	825,000	G	T04	
706	U026	825,000	G	T04	
707	U027	825,000	G	T04	
708	U028	825,000	G	T04	
709	U029	825,000	G	T04	
710	U030	825,000	G	T04	
711	U031	825,000	G	T04	
712	U032	825,000	G	T04	
713	U033	825,000	G	T04	
714	U034	825,000	G	T04	
715	U035	825,000	G	T04	
716	U037	825,000	G	T04	
717	U038	825,000	G	T04	
718	U039	825,000	G	T04	
719	U041	825,000	G	T04	
720	U042	825,000	G	T04	
721	U043	825,000	G	T04	
722	U044	825,000	G	T04	
723	U045	825,000	G	T04	
724	U046	825,000	G	T04	
725	U047	825,000	G	T04	
726	U048	825,000	G	T04	
727	U049	825,000	G	T04	
728	U050	825,000	G	T04	
729	U051	825,000	G	T04	
730	U052	825,000	G	T04	
731	U053	825,000	G	T04	
732	U055	825,000	G	T04	
733	U056	825,000	G	T04	
734	U057	825,000	G	T04	
735	U058	825,000	G	T04	
736	U059	825,000	G	T04	
737	U062	825,000	G	T04	
738	U063	825,000	G	T04	
739	U064	825,000	G	T04	
740	U066	825,000	G	T04	
741	U067	825,000	G	T04	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
742	U068	825,000	G	T04	
743	U069	825,000	G	T04	
744	U070	825,000	G	T04	
745	U071	825,000	G	T04	
746	U072	825,000	G	T04	
747	U073	825,000	G	T04	
748	U074	825,000	G	T04	
749	U075	825,000	G	T04	
750	U076	825,000	G	T04	
751	U077	825,000	G	T04	
752	U078	825,000	G	T04	
753	U079	825,000	G	T04	
754	U080	825,000	G	T04	
755	U081	825,000	G	T04	
756	U082	825,000	G	T04	
757	U083	825,000	G	T04	
758	U084	825,000	G	T04	
759	U085	825,000	G	T04	
760	U086	825,000	G	T04	
761	U087	825,000	G	T04	
762	U088	825,000	G	T04	
763	U090	825,000	G	T04	
764	U091	825,000	G	T04	
765	U092	825,000	G	T04	
766	U093	825,000	G	T04	
767	U094	825,000	G	T04	
768	U095	825,000	G	T04	
769	U096	825,000	G	T04	
770	U097	825,000	G	T04	
771	U098	825,000	G	T04	
772	U099	825,000	G	T04	
773	U101	825,000	G	T04	
774	U102	825,000	G	T04	
775	U103	825,000	G	T04	
776	U105	825,000	G	T04	
777	U106	825,000	G	T04	
778	U107	825,000	G	T04	
779	U108	825,000	G	T04	
780	U109	825,000	G	T04	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
781	U110	825,000	G	T04	
782	U111	825,000	G	T04	
783	U112	825,000	G	T04	
784	U113	825,000	G	T04	
785	U114	825,000	G	T04	
786	U115	825,000	G	T04	
787	U116	825,000	G	T04	
788	U117	825,000	G	T04	
789	U118	825,000	G	T04	
790	U119	825,000	G	T04	
791	U120	825,000	G	T04	
792	U121	825,000	G	T04	
793	U122	825,000	G	T04	
794	U123	825,000	G	T04	
795	U124	825,000	G	T04	
796	U125	825,000	G	T04	
797	U126	825,000	G	T04	
798	U127	825,000	G	T04	
799	U128	825,000	G	T04	
800	U130	825,000	G	T04	
801	U131	825,000	G	T04	
802	U132	825,000	G	T04	
803	U133	825,000	G	T04	
804	U134	825,000	G	T04	
805	U136	825,000	G	T04	
806	U137	825,000	G	T04	
807	U138	825,000	G	T04	
808	U140	825,000	G	T04	
809	U141	825,000	G	T04	
810	U143	825,000	G	T04	
811	U144	825,000	G	T04	
812	U145	825,000	G	T04	
813	U146	825,000	G	T04	
814	U147	825,000	G	T04	
815	U148	825,000	G	T04	
816	U149	825,000	G	T04	
817	U150	825,000	G	T04	
818	U151	825,000	G	T04	
819	U152	825,000	G	T04	

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7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
820	U153	825,000	G	T04	
821	U154	825,000	G	T04	
822	U155	825,000	G	T04	
823	U156	825,000	G	T04	
824	U157	825,000	G	T04	
825	U158	825,000	G	T04	
826	U159	825,000	G	T04	
827	U160	825,000	G	T04	
828	U161	825,000	G	T04	
829	U162	825,000	G	T04	
830	U163	825,000	G	T04	
831	U164	825,000	G	T04	
832	U165	825,000	G	T04	
833	U166	825,000	G	T04	
834	U167	825,000	G	T04	
835	U168	825,000	G	T04	
836	U169	825,000	G	T04	
837	U170	825,000	G	T04	
838	U171	825,000	G	T04	
839	U172	825,000	G	T04	
840	U173	825,000	G	T04	
841	U174	825,000	G	T04	
842	U176	825,000	G	T04	
843	U177	825,000	G	T04	
844	U178	825,000	G	T04	
845	U179	825,000	G	T04	
846	U180	825,000	G	T04	
847	U181	825,000	G	T04	
848	U182	825,000	G	T04	
849	U183	825,000	G	T04	
850	U184	825,000	G	T04	
851	U185	825,000	G	T04	
852	U186	825,000	G	T04	
853	U187	825,000	G	T04	
854	U188	825,000	G	T04	
855	U190	825,000	G	T04	
856	U191	825,000	G	T04	
857	U192	825,000	G	T04	
858	U193	825,000	G	T04	

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7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
859	U194	825,000	G	T04	
860	U197	825,000	G	T04	
861	U200	825,000	G	T04	
862	U201	825,000	G	T04	
863	U203	825,000	G	T04	
864	U204	825,000	G	T04	
865	U206	825,000	G	T04	
866	U207	825,000	G	T04	
867	U208	825,000	G	T04	
868	U209	825,000	G	T04	
869	U210	825,000	G	T04	
870	U211	825,000	G	T04	
871	U213	825,000	G	T04	
872	U214	825,000	G	T04	
873	U215	825,000	G	T04	
874	U216	825,000	G	T04	
875	U217	825,000	G	T04	
876	U218	825,000	G	T04	
877	U219	825,000	G	T04	
878	U220	825,000	G	T04	
879	U221	825,000	G	T04	
880	U222	825,000	G	T04	
881	U223	825,000	G	T04	
882	U225	825,000	G	T04	
883	U226	825,000	G	T04	
884	U227	825,000	G	T04	
885	U228	825,000	G	T04	
886	U234	825,000	G	T04	
887	U235	825,000	G	T04	
888	U236	825,000	G	T04	
889	U237	825,000	G	T04	
890	U238	825,000	G	T04	
891	U239	825,000	G	T04	
892	U243	825,000	G	T04	
893	U244	825,000	G	T04	
894	U246	825,000	G	T04	
895	U248	825,000	G	T04	
896	U328	825,000	G	T04	
897	U353	825,000	G	T04	

REPRODUCTION OF FORM APPROVED OMB NO. 2050-0024

7. DESCRIPTION OF HAZARDOUS WASTES (CONTINUED)					
LINE NO.	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 7.D(1))
898	U359	825,000	G	T04	

OMB# 2050-0024; Expires 08/31/2028

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (Select only one.)

☐	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
☐	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
	☐ Site was a TSD facility, a reverse distributor, and/or generator of ≥ 1,000 kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in **one or more months of the reporting year** (or State equivalent LQG regulations)
☐	Notifying that regulated activity is no longer occurring at this Site
☐	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
☑	Submitting a new or revised Part A (permit) Form

2. Site EPA ID Number

N	M	D	0	0	2	2	0	8	6	2	7

3. Site Name

ADVANCED CHEMICAL TREATMENT LLC

4. Site Location Address

Street Address	6137 EDITH BLVD NE				
City, Town, or Village	ALBUQUERQUE			County	BERNALILLO
State	NM	Country	U.S.A.	Zip Code	87107
Latitude	35.14440	Longitude	-106.62900	☐ Use Lat/Long as Primary Address	

5. Site Mailing Address ☑ Same as Location Street Address

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

6. Site Land Type

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

7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary)	562211	C.	562998
B.	562112	D.	

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EPA ID Number | N | M | D | 0 | 0 | 2 | 2 | 0 | 8 | 6 | 2 | 7 | OMB# 2050-0024; Expires 08/31/2028

8. Site Contact Person

Enter the primary site contact here and additional contacts in Appendix A.

First Name PIERRE-LUC	MI	Last Name JUTEAU
Title GENERAL MANAGER		
Email PJUTEAU@REPUBLICSERVICES.COM		
Phone 208-506-9079	Ext N/A	Fax N/A
Preferred Language ENGLISH		

A. Site Contact Address ☑ Same as Location Address

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

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner ☑ Same as Location Address

Full Name ADVANCED CHEMICAL TREATMENT LLC		Date Became Owner (mm/dd/yyyy) 05/21/2015
Owner Type ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email PJUTEAU@REPUBLICSERVICES.COM		
Phone 208-506-9079	Ext N/A	Fax N/A
Comments		

B. Name of Site's Legal Operator ☑ Same as Location Address

Full Name ADVANCED CHEMICAL TREATMENT LLC		Date Became Operator (mm/dd/yyyy) 5/21/2015
Operator Type ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email PJUTEAU@REPUBLICSERVICES.COM		
Phone 208-506-9079	Ext N/A	Fax N/A
Comments		

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EPA ID Number | N | M | D | 0 | 0 | 2 | 2 | 0 | 8 | 6 | 2 | 7 | OMB# 2050-0024; Expires 08/31/2028

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

☑ Y ☐ N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c		
	☑	a. LQG	-Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); 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 ☐ N	Is State Generator of Hazardous Waste the same as Federal— If "No", indicate State Generator Category in the space provided.		
☐ Y ☑ N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. *Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.*		
☑ Y ☐ N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.		
☑ Y ☐ N	4. Receives Hazardous Waste from Off-site		
☐ Y ☑ N	5 Recycler of Hazardous Waste		
	☐	a. Recycler who stores prior to recycling	
	☐	b. Recycler who does not store prior to recycling	
☐ Y ☑ N	6. 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	

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

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.

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EPA ID Number | N | M | D | 0 | 0 | 2 | 2 | 0 | 8 | 6 | 2 | 7 | OMB# 2050-0024; Expires 08/31/2028

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

A. Other Waste Activities

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

B. Universal Waste Activities

☑ Y ☐ N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If "Yes" mark all that apply. Note: Refer to your State regulations to determine what is regulated.	
	☑	a. Batteries
	☑	b. Pesticides
	☑	c. Mercury containing equipment
	☑	d. Lamps
	☐	e. Aerosol Cans
	☐	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

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

EPA ID Number | N | M | D | 0 | 0 | 2 | 2 | 0 | 8 | 6 | 2 | 7 | OMB# 2050-0024; Expires 08/31/2028

D. Pharmaceutical Activities

☐ Y ☑ N	1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if "Yes", mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
☐	a. Healthcare Facility
☐	b. Reverse Distributor
☐ Y ☑ N	2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

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

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

13. Episodic Generation

☐ Y ☑ N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If "Yes", you must fill out the Addendum for Episodic Generator.

14. LQG Consolidation of VSQG Hazardous Waste

☐ Y ☑ N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If "Yes", you must fill out the Addendum for LQG Consolidation of VSQG hazardous waste.

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

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

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16. 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 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.

17. Electronic Manifest Broker

☐ Y ☑ N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?

18. Comments (include item number for each comment)

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

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Pierre-Luc Juteau	12/17/2025 1/6/2026
Printed Name (First, Middle Initial Last) PIERRE-LUC JUTEAU	Title GENERAL MANAGER
Email PJUTEAU@REPUBLICSERVICES.COM	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Signed by: Pierre-Luc Juteau	1/6/2026
Printed Name (First, Middle Initial Last) Pierre-Luc Juteau	Title General Manager
Email pjuteau@republicservices.com	

Table A-1
Federal Hazardous Waste Handled at ACT
Section 10.B - Waste Codes for Federally Regulated Hazardous Wastes

Federal Hazardous Waste Numbers												
D001	F001	K017	K084	K147	P030	P081	P192	U034	U080	U125	U169	U218
D002	F002	K018	K085	K148	P031	P082	P194	U035	U081	U126	U170	U219
D003	F003	K019	K086	K149	P033	P084	P196	U036	U082	U127	U171	U220
D004	F004	K020	K087	K150	P034	P085	P197	U037	U083	U128	U172	U221
D005	F005	K021	K088	K151	P036	P087	P198	U038	U084	U129	U173	U222
D006	F006	K022	K093	K156	P037	P088	P199	U039	U085	U130	U174	U223
D007	F007	K023	K094	K157	P038	P089	P201	U041	U086	U131	U176	U225
D008	F008	K024	K095	K158	P039	P092	P202	U042	U087	U132	U177	U226
D009	F009	K025	K096	K159	P040	P093	P203	U043	U088	U133	U178	U227
D010	F010	K026	K097	K161	P041	P094	P204	U044	U089	U134	U179	U228
D011	F011	K027	K098	K171	P042	P095	P205	U045	U090	U135	U180	U234
D012	F012	K028	K099	K172	P043	P096	U001	U046	U091	U136	U181	U235
D013	F019	K029	K100	K174	P044	P097	U002	U047	U092	U137	U182	U236
D014	F020	K030	K101	K176	P045	P098	U003	U048	U093	U138	U183	U237
D015	F021	K031	K102	K177	P046	P099	U004	U049	U094	U140	U184	U238
D016	F022	K032	K103	K178	P047	P101	U005	U050	U095	U141	U185	U239
D017	F023	K033	K104	P001	P048	P102	U006	U051	U096	U142	U186	U240
D018	F024	K034	K105	P002	P049	P103	U007	U052	U097	U143	U187	U243
D019	F025	K035	K106	P003	P050	P104	U008	U053	U098	U144	U188	U244
D020	F026	K036	K107	P004	P051	P105	U009	U055	U099	U145	U189	U246
D021	F027	K037	K108	P005	P054	P106	U010	U056	U101	U146	U190	U247
D022	F028	K038	K109	P006	P056	P108	U011	U057	U102	U147	U191	U248
D023	F032	K039	K110	P007	P057	P109	U012	U058	U103	U148	U192	U249
D024	F034	K040	K111	P008	P058	P110	U014	U059	U105	U149	U193	U271
D025	F035	K041	K112	P009	P059	P111	U015	U060	U106	U150	U194	U278
D026	F037	K042	K113	P010	P060	P112	U016	U061	U107	U151	U196	U279
D027	F038	K043	K114	P011	P062	P113	U017	U062	U108	U152	U197	U280
D028	F039	K044	K115	P012	P063	P114	U018	U063	U109	U153	U200	U328
D029	K001	K045	K116	P013	P064	P115	U019	U064	U110	U154	U201	U353
D030	K002	K046	K117	P014	P065	P116	U020	U066	U111	U155	U203	U359
D031	K003	K047	K118	P015	P066	P118	U021	U067	U112	U156	U204	U364
D032	K004	K048	K123	P016	P067	P119	U022	U068	U113	U157	U205	U367
D033	K005	K049	K124	P017	P068	P120	U023	U069	U114	U158	U206	U372
D034	K006	K050	K125	P018	P069	P121	U024	U070	U115	U159	U207	U373
D035	K007	K051	K126	P020	P070	P122	U025	U071	U116	U160	U208	U387
D036	K008	K052	K131	P021	P071	P123	U026	U072	U117	U161	U209	U389
D037	K009	K060	K132	P022	P072	P127	U027	U073	U118	U162	U210	U394
D038	K010	K061	K136	P023	P073	P128	U028	U074	U119	U163	U211	U395
D039	K011	K062	K141	P024	P074	P185	U029	U075	U120	U164	U213	U404
D040	K013	K069	K142	P026	P075	P188	U030	U076	U121	U165	U214	U409
D041	K014	K071	K143	P027	P076	P189	U031	U077	U122	U166	U215	U410
D042	K015	K073	K144	P028	P077	P190	U032	U078	U123	U167	U216	U411
D043	K016	K083	K145	P029	P078	P191	U033	U079	U124	U168	U217	

C.0 PERMIT ATTACHMENT C WASTE ANALYSIS PLAN

C.1 INTRODUCTION

This waste analysis plan (WAP) contains requirements and procedures for the characterization of the chemical and physical nature of hazardous wastes generated, stored, or otherwise managed at the Advanced Chemical Treatment LLC.'s (ACT's) Treatment and Storage Facility (the Facility).

C.2 PERMITTED AND PROHIBITED WASTE

The Facility shall only accept and manage those hazardous wastes listed in Part A of the Facility's Permit Attachment B (Authorized Wastes). In addition, only hazardous waste which meets the land disposal restrictions (LDR) treatment standards identified in 40 CFR Part 268, Subpart D shall be accepted.

The facility is prohibited from accepting for treatment, storage, and otherwise management of hazardous and other wastes listed in Permit Part 2, Section 2.2.4.

C.3 PRE-ACCEPTANCE PROCEDURES FOR OFF-SITE WASTE

Before a waste stream is accepted, all off-site generators will be required to provide a complete waste characterization as described below (Section C.3.2). After evaluating the information supplied by the generator, the Facility shall send a representative sample of the waste to a laboratory for analysis and will evaluate the analytical results (Section C.3.4). Finally, the Facility will notify the generator that the Facility will accept the waste stream (Section C.3.5).

C.3.1 Waste Characterization Information Provided by the Generator

The generator must provide the Permittee with the following waste characterization information for each waste stream:

i. a completed Waste Profile Sheet signed by an authorized agent of the generator. This form may be changed if the Facility believes that more information is warranted or if there are changes in regulations governing the Facility;

ii. other documentation that supports the information presented on the Waste Profile Form, such as safety data sheets (SDS);

iii. a description of the process that generated the waste;

iv. all other supporting data on testing, tracking, and recordkeeping required by 40 CFR § 268.7;

v. all required certifications;

vi. waste analysis data used to characterize the waste documentation and/or process knowledge documentation, as applicable; and

vii. a representative sample(s) of the waste, of adequate volume for analysis.

If waste analysis is used to characterize the waste, the generator must supply, at a minimum, the following waste analysis data for each representative sample:

a. identification of the sample medium (e.g., liquids, sludge, soil).

b. information about waste stratification.

c. brief description of the sampling strategy,

d. a description of the sampling technique (i.e., biased or random).

e. rationale for selection of the number and location of samples.

f. a description of the statistical approach, if any.

g. the sample type (e.g., grab, composite).

h. identification of the analytical methods that were used and the rationale for the selection of these parameters.

i. final laboratory reports including case narratives, waste analyses, and QA/QC analyses; and

j. identification of the laboratory that performed the waste analyses.

The Facility shall evaluate the way each representative sample was obtained in order to determine whether it is truly representative of the waste stream. The Facility shall evaluate the information provided by the supplier and will use the documents listed below for guidance:

- The Sampling Plan, Section C.6 of this Permit Attachment,
- Standard Practice for Sampling Waste and Soil for Volatile Organics (American Society for Testing and Materials (ASTM) D4547-91),
- Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods, (US Environmental Protection Agency Publication SW-846, latest edition), and
- RCRA Sampling Procedures Handbook (EPA Region VI).

In certain cases, generators may meet waste analysis requirements by supplying Acceptable Knowledge (AK) to the Facility, including process knowledge and waste analysis. Process knowledge includes detailed information of a waste obtained from existing published or documented waste analysis data or studies on hazardous wastes generated by processes similar to those which generated the waste, or industry or trade association hazardous waste profile studies, or EPA documents. Examples of waste streams where process knowledge may be adequate for characterization are K-listed wastes (hazardous wastes from specific sources), which are identified by comparing the specific process that generated the waste to those processes listed in 40 CFR § 261.32. The application of process knowledge is appropriate where the physical/chemical make-up of the waste is well known and consistent.

C.3.2 Paperwork Evaluation

ACT shall evaluate all the waste characterization paperwork to determine if it adequately represents the physical and chemical characteristics of the waste stream and whether the waste stream is appropriate for management at the Facility. As part of the pre-shipment process, the Facility shall work with the off-site waste generators to ensure that all necessary waste analyses and waste characterization information are provided to meet the applicable acceptance requirements.

If waste analysis was used to characterize the waste, the Facility shall evaluate the data to determine that:

i. appropriate extraction and preservation techniques were used;

ii. appropriate sampling strategies were used;

iii. appropriate representative sample types were collected;

iv. appropriate parameters were selected for analysis;

v. appropriate analytical methods were used;

vi. recommended holding times were met;

vii. detection limits were below applicable standards (e.g., the LDR standards); and

viii. the quality of the analytical data is up to date, valid, and adequate for making a waste determination based on an evaluation of the final laboratory reports.

If the data supplied are not adequate to provide a complete characterization of the waste stream, the Facility will either require additional information from the generator or will not accept the waste.

All the waste characterization information supplied by the generator shall be maintained in the Facility's Operating Record. In addition, the Facility's evaluation of this information and the results of the independent analysis shall be maintained in the Operating Record.

C.3.3.3 Representative Sample Assessment

After evaluation and approval of the sample representativeness and waste characterization data paperwork, the representative sample submitted by the generator shall be analyzed by a qualified laboratory that is not the same laboratory as that used by the generator. Based upon the Facility's evaluation of the information supplied by the generator, the Facility shall inform the laboratory of the type of medium (e.g., aqueous, solid) and the appropriate parameters for chemical analyses. The rationale for selection of the parameters shall be maintained in the Facility's Operating Record.

The generator's Waste Profile Form/Sheet shall be compared with the results of the laboratory analyses of the representative sample and with the Facility's permit to ensure that the waste is

acceptable for management and transfer by the Facility. Should there be a discrepancy between the analytical results and the generator information, the Facility shall contact the generator to resolve the discrepancy. The generator shall not be authorized to ship the waste to ACT until all discrepancies have been resolved. If the discrepancies cannot be resolved with the information provided by the generator, the Facility may request a new Waste Profile Form and any additional information that may be required to characterize the waste adequately or reject the waste stream for disposal. In addition, the Facility may require the generator to submit additional samples of the waste for analyses. If the generator cannot supply adequate information to provide a complete characterization of the waste stream, the Facility will not accept the waste. The generator shall submit a new Waste Profile Form for each new waste stream and for an existing waste stream if the composition of the waste stream changes significantly.

C.3.3. a Major Discrepancies

Major discrepancies include the following:

i. analytical results indicating that the generator applied an incomplete or incorrect waste code to the waste stream;

ii. analytical results indicating that the generator submitted incomplete or incorrect information on the LDR Notification Form;

iii. analytical results including constituents or underlying hazardous characteristics that are not explained by a description of the process; and

iv. any other information indicating that the waste stream was not characterized properly.

In the event of a significant discrepancy, the Facility shall reject the paperwork and require the generator to analyze the waste in accordance with a sampling plan that is consistent with the guidance in the EPA document *SW-846, Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods,* Chapter 9, or the replacement document, "*RCRA Waste Sampling Technical Guide SW-846*". The Facility shall require the generator to resubmit the waste characterization information listed in Section C.3.1 and one or more additional representative samples for chemical analyses.

C.3.3.b Minor Discrepancies

Minor discrepancies include any other waste characterization discrepancies that do not potentially affect hazardous waste code assignments, waste treatment, or the presence of prohibited items. In the event of a minor discrepancy, the Facility shall work with the generator to resolve the discrepancy. For example, uncertainties regarding whether sorbents are present will be handled as minor discrepancies. The Facility shall contact the generator if the Waste Profile Form does not indicate whether a sorbent was added to the waste, or if it indicates that a sorbent was added but did not specify the name and type of sorbent and whether it is biodegradable. If the generator cannot provide this documentation, the waste must be tested to determine whether it contains a biodegradable sorbent. If the waste is determined to contain a biodegradable sorbent, it shall be rejected.

C.3.3.c Additional Waste Acceptance Conditions

In addition to complete characterization of the waste, ACT shall also evaluate the waste to ensure that it can be managed at the Facility. Waste analysis shall be conducted where necessary to ensure that:

i. the waste is not prohibited (e.g., the waste is included in Part A of this application, is not listed in Permit Part 2.2.4 as a prohibited waste or does not exceed allowable PCB concentrations and also does not include dioxins).

ii. the LDR treatment standards contained in 40 CFR Part 268, Subpart D, including the standards for underlying hazardous constituents, are met if applicable.

iii. the general requirements contained in 40 CFR § 264.17 for ignitable, reactive, and/or incompatible waste are met; and

iv. the waste does not contain biodegradable sorbents, as required in 40 CFR § 264.314(d).

All major and minor discrepancies, discrepancy resolutions, and compliance with the additional waste acceptance conditions listed above shall be documented in writing and maintained in the Facility Operating Record.

C.3.4 Notification and Approval of Waste Shipment

After the Facility has determined that the waste stream meets the pre-acceptance requirements, the Facility shall send a written notification to the generator. This notification shall include the following:

i. a statement that the waste can be accepted at the Facility.

ii. a unique identifier number for the waste stream, assigned by the Facility.

iii. instructions to put the unique identifier number on all shipment paperwork and all future waste characterization data that are submitted for the waste stream.

iv. a requirement to notify the Facility at least 24 hours before shipping, so that the Facility can ensure that there are enough resources and capacity to manage the shipment when it arrives.

v. A statement that the Facility reserves the right to delay acceptance of shipments beyond the 24-hour time frame.

vi. instructions to ensure safe management of the waste (e.g., packaging, or labeling requirements not otherwise required by regulations).

vii. a requirement that the generator retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to

characterization of the waste stream for five years from the date that the waste was last sent to the Facility.

Once the Facility has completed pre-acceptance requirements and has determined that a waste stream is acceptable for storage at the Facility, the on-site laboratory will be notified in writing. The notification shall include the waste type, waste stream identifier, physical form, packaging, and how the waste is to be managed. This information shall be used by the laboratory as follows:

- the waste stream identifier shall be used to track the samples in relation to the waste stream;
- the waste type shall be used to help determine the analytical methods to be employed for fingerprint analysis; and
- the physical form and packaging will determine the most applicable sampling methods.

Using this information, the on-site laboratory shall designate a sampling and analytical protocol specific to each waste stream as described in Section C.6. The unique identifier number for the waste stream shall be used to track all activities for the waste stream. Individual shipments from within the waste stream shall receive an additional identifier to enable the Facility to tie information back to the specific shipment as well as to the waste stream.

C.4 PROCEDURES FOR INCOMING WASTE ACCEPTANCE

Prior to accepting incoming waste, the Facility shall review the waste shipment paperwork and resolve paperwork discrepancies (Section C.4.1) and visually inspect the waste inside the containers and roll-off boxes (Section C.4.2). Waste analyses for incoming shipments shall be conducted as described in Section C.4.3 of this waste Analysis Plan. Based on the Facility's evaluation of the waste stream, a determination to accept or reject the waste shall be made.

C.4.1 Paperwork Review

Upon receipt of a waste shipment, the vehicle shall be routed to a parking area outside the Facility gate while documents are reviewed. The Facility shall:

i. review all paperwork for completeness to verify that all required documentation is present and signed as necessary.
ii. compare the information in the manifest, the Waste Profile Form, the LDR Notification Form, and pre-acceptance waste characterization information for consistency.
iii. compare the number of containers, the volume or weight of the waste, and the waste labels on each container with the manifest for consistency; and
iv. review all paperwork to verify that the unique identifier number for the waste stream is on all the waste shipment paperwork and all accompanying waste characterization data.

If the Facility determines that the paperwork is complete and consistent, the waste shipment shall be routed to the truck sampling station, a staging area inside the Facility gate.

If the Facility determines that the paperwork is incomplete or inconsistent, the waste shipment shall not be accepted. The Facility shall resolve significant manifest discrepancies in accordance with 40 CFR § 264.72. Manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest and the quantity or type of hazardous waste contained in the shipment received at the Facility.

Major discrepancies in quantity are:

- *Bulk waste:* variations greater than 10 percent in weight; and
- *Batch waste:* any variation in piece count, such as a discrepancy of one drum in a truckload.

Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

All discrepancy resolutions shall be documented in writing and maintained in the Facility Operating Record. If manifest discrepancies are not resolved within 15 days of identifying the discrepancy, waste shall not be accepted for disposal, and the waste shall be returned to the sender or transported to an appropriate off-site facility.

C.4.2 Visual Inspection

After all the paperwork discrepancies have been resolved, the Facility shall physically open and inspect the waste inside the drums and roll-off boxes for color, similar physical appearance (e.g., single phase, bi-layer, or multi-layer), and physical state (e.g., solid or semi-solid). This information shall be compared with the waste characterization information provided by the generator and the physical appearance of the representative sample. If the color and/or viscosity of bulk wastes (solids and sludges) appear inconsistent, the Facility shall perform additional chemical tests (e.g., composite samples may be collected from within the different areas of coloration or viscosity).

The Facility shall inspect a minimum of 10 percent of all containers of each hazardous waste stream per shipment (but not less than one container per waste shipment).

The Facility shall physically open all containers of hazardous debris and inspect the contents to ensure that the waste shipment matches the waste that is expected. Hazardous debris may be visually inspected because it is exempted from the representative sample waste analysis requirements discussed in Section C.7.2. This visual inspection must ensure that the waste stream matches the description provided by the generator.

Certain loads may not be sampled, at the discretion of the Facility manager or laboratory supervisor, for environmental and safety reasons (e.g., severe weather which causes unsafe working conditions). In these cases, the generator or his agent shall be required to provide a signed

certification that the load conforms to the Waste Profile Form. This variance from established procedure shall be documented in the Facility Operating Record.

If a discrepancy is found, the Facility shall contact the waste generator for resolution (see Section C.4.1). The results of visual inspections and all discrepancy resolutions shall be documented in writing and maintained in the Facility Operation Record. If discrepancies noted during visual examination are not resolved within 15 days of identifying the discrepancy, waste shall not be accepted for disposal, and the waste will either be returned to the sender or transported off-site to an appropriate facility.

C.4.3 Waste Analysis for Incoming Shipments

Waste analysis for incoming shipments shall include fingerprint tests, analysis of initial five shipments of each waste stream, and an annual analysis to ensure correct characterization of each waste stream, as described in Sections C.4 and C.5 of this Permit Attachment.

C.4.3.a Fingerprint Test Procedure

Fingerprint testing is an abbreviated analysis and is used to confirm that an incoming shipment of waste received at the Facility is the actual waste expected and that it matches the expected chemical content for that waste. Fingerprint analysis shall be conducted on each waste stream in each shipment prior to shipment acceptance. Fingerprint analysis shall be conducted generally for parameters that will provide information that can be used to verify that a waste stream received from off-site matches the expected characteristics of the waste.

While the incoming shipment is staged at the sampling station, laboratory personnel or other trained personnel shall review the sampling and laboratory requirements for the specific waste stream. After completion of this review, sampling personnel shall obtain the necessary samples in the manner prescribed in the Sampling Plan under Section C.6 and applicable laboratory requirements. Sampling shall be conducted in accordance with approved site operating procedures. These procedures shall detail the sampling requirements, sample labeling, chain-of-custody requirements, any necessary sample preservation requirements, and other sampling components (Section C.6).

Each waste stream in each shipment shall be sampled in accordance with the following sampling rate, at a minimum:

- *Bulk waste*: one sample shall be collected from each shipment of bulk waste (one shipment of bulk waste is one truck load or one roll-off box). If, upon visual inspection, the color and viscosity of solids or sludges appear inconsistent, the Facility shall obtain additional samples. These samples may be collected from within the different areas of color or viscosity.
- *Batch waste:* one sample shall be collected from each 10 waste drums in each waste stream in each shipment. If there are less than 10 waste drums in the waste stream, one drum shall be sampled. One sample shall be collected from each drum if the waste appears to be inconsistent with the pre-acceptance waste characterization data.

The Facility may increase this sampling rate for any reason. For example, the Facility may decide to collect additional samples if the waste appears to be inconsistent between containers or with the pre-acceptance characterization data. In some instances, the Facility may elect to waive one or more analyses under the following conditions:

- the transported waste is a portion of a continuously shipped, well documented waste stream, such as waste produced from a consistent, non-variable process or contaminated soils from a specific remedial action.
- the waste has been approved for receipt by the NMED on an emergency basis,
- Facility personnel at the point of generation sampled, or oversaw the sampling of, the waste, and the fingerprint test/supplemental analyses have been conducted. (In cases where a generator is sending very large or continual shipments, the Facility may elect to station personnel at the point of generation to obtain samples prior to or during loading of the waste).

Prior to waiving any sampling and analysis requirements, the Facility shall request a variance from the NMED and shall not dispose of the waste until NMED approval is received.

C.4.3.b Annual Waste Analysis Procedure

As part of the Facility's QA/QC procedures (Section C.7.2), the representative sample analysis for each waste stream from each generator shall be repeated annually. Repeating this pre-acceptance procedure shall ensure that the analysis is accurate and up-to-date and that the waste stream has remained within the operational bounds of the Facility. This annual analysis shall be performed by an independent laboratory. This analysis shall be repeated more frequently if the Facility believes, or has been informed by the generator, that the process generating the waste stream has changed. In the case of a change in the waste generation process the waste stream shall be managed as a new waste stream in accordance with the requirements of this WAP.

C.4.3.c Analysis of Initial Five Shipments

As part of the Facility's QA/QC procedures, the Permittee shall submit representative samples collected from the first five shipments of each waste stream from each generator for the appropriate characterization laboratory analyses and compare the test results to the generator supplied data to ensure that discrepancies do not exist between the waste received and generator supplied information. If no significant discrepancy is discovered, then the Permittee shall conduct stratified sampling and analysis for each waste stream from each generator as specified at Permit Part C.4.3.b. If significant discrepancies are discovered, then the Permittee shall analyze each incoming waste shipment from that waste generator until no significant discrepancies are observed for five consecutive shipments.

C.4.4 Waste Acceptance/Rejection Determination

C.4.4.a Discrepancy Resolution

Upon completion of the fingerprint analysis, the Permittee shall make a determination on whether or not the wastes are consistent with the pre-acceptance waste characterization information and within the acceptance limits of the Facility. If any of the analyses determine the waste is not within the operational acceptance limits for disposal, the waste shall not be accepted by the Facility. If the results of the analysis conflict with the waste profile information, the Facility shall take any or all of the following actions:

i. resample the waste, if necessary, and perform a second fingerprint test. The Facility manager has discretion to accept the waste if the second fingerprint results match those on the waste profile sheet. The discrepancy between results shall be explained and included in the Facility Operating Record for that waste stream or shipment.
ii. perform further characterization as necessary to verify the composition of the waste by sending a sample to a qualified independent analytical laboratory.
iii. reject the entire waste shipment or the nonconforming portion of the shipment.

If discrepancies between fingerprint analysis and waste stream characterization information exist upon completion of discrepancy resolution, the waste shall be rejected by the Facility and the rejected waste returned to the generator or, alternately, the Facility will ensure proper transport of the waste at to an appropriate off-site facility within 30 days of the waste rejection.

C.4.4.b Shipment Acceptance Procedures

Once the decision has been made to accept a waste shipment, the appropriate papers shall be signed for the generator, and the waste stream will be transported to the Treatment, Storage, Disposal Facility (TSDF).

C.5 WASTE ANALYSIS OF HAZARDOUS WASTE GENERATED OFF-SITE

Tables C-1 through C-3 specify parameters which the waste will be analyzed for, to ensure that all criteria for waste acceptance and management are met. The Facility will use approved SW-846 or ASTM analytical methods, or alternate NMED- approved methods. If an alternative method not contained in SW-846 is to be used, the Facility shall demonstrate that such alternative method is equivalent or superior to the approved method contained in SW-846 or this WAP. Alternative methods shall be submitted to the NMED at least 30 days prior to the sample collection event.

TABLE C-1: Parameters and Methods for Pre-Acceptance, Representative Sample Analysis

Waste Parameters	Extraction or Sample Preparation	Analysis Methods[a]	Rationale for Selection
Volatile organic compounds	5021, 5031 5032, 5035	8260 and 8260B	Determine if the waste is potentially listed or if the concentration of any volatile organic compound exceeds the limits in 40 CFR § 261.24
Semi volatile organic compounds	3510 3520	8270	Determine if the waste is potentially listed or if the concentration of any semi volatile organic compound exceeds the limits in 40 CFR § 261.24.
Organochlorine pesticides	3510 3520	8081/8270	Indicates if the material is chlorinated. The information is used to check conformance with Waste Profile Sheets (WPS) as needed, as well as disposal options.
PCBs	Prohibited	Prohibited	To determine PCB content in order to verify WPS information and assess applicability under the Toxic Substances Control Act (TSCA).
TCLP: Organics	1311	8260/8270	
Chlorinated herbicides	8151[b]	8151	Indicates if the material is chlorinated. The information is used to check conformance with Waste Profile Sheets (WPS) as needed, as well as disposal options.
Reactive cyanide		Prohibited	
Reactive sulfide		9034	
Ignitability/BTU Value		1010/1030,	Indicates the fire-producing potential of the waste and helps Facility determine whether the waste is ignitable.
Energy Content		ASTM D240	To determine the BTU values of liquid waste streams by Bomb Calorimeter.
Flashpoint		1010/1020 A	Indicates the fire-producing potential of the waste and determines whether the waste is ignitable.
Corrosivity to metals		1110	Indicates the potential of the waste to corrode metals and determines whether the waste is corrosive.
Oxidizer Screen		9040 (Solid), ASTM-D4981 (liquid)	A general qualitative test used to determine if a waste is an oxidizer, which must be segregated, to avoid potential reaction with a wide range of wastes.
pH		9040C	Used to determine the acidity and alkaline levels in aqueous liquids.
RCRA Metals	3000 1311	6000 series 7000 series	Determines if the concentrations of Arsenic, barium, cadmium, chromium, lead, mercury, silver, and selenium exceed the limits in 40 CFR § 261.24

a Most current revision of SW-846 will be used.
b Method 8151 contains the extraction, cleanup, and determinative procedures for these analytes.

TABLE C-2. Tests And Analytical Methods for Fingerprint Samples

Test	Method and Description	Qualitative or Quantitative
Flammability potential screen	ASTM D4982	Qualitative
Free liquids	Paint filter test, penetrometer, or visual/9095	Qualitative
Ignitability	Match test, Pensky-Martens closed cup or Set-a-flash 1010/1020A	Qualitative
Miscibility	50/50 mixture with water	Qualitative
Chlorinated solvents	Colorimetric test or Beilsten test	Quantitative
PCBs	Colorimetric test/8080	Quantitative
Specific gravity	Hydrometer/Method dependent on material composition and physical state	Quantitative
Sulfide screen	ASTM 4978	Quantitative

TABLE C-3. Additional Tests and Analytical Methods

Test	Reference	Description
Paint filter test	EPA 9095	This test will determine the free liquids that are contained within the waste matrix and will be used as a control parameter for wastes that are to be landfilled.
Heavy metals	6010A/7470	This test determines the concentration of heavy metals.
Total organic halogens	EPA 9020	Tests if the waste potentially contains LDR constituents above BDAT standards for California List wastes.
PCBs	Colorimetric test/EPA 8080	Tests if PCBs are contained in the waste matrix and determines the concentration.
IR scan	ASTM D2621, D4053	Tests for the presence of organics and provides a rough estimate of their concentration.

a Analytical method chosen is dependent upon the constituent being determined (i.e., Organics 8260, 8270, 8080).

C.5.2 Representative Sample Analysis

The Facility shall select parameters for analysis to ensure that the criteria for waste acceptance identified in Section C.3 are met. The analysis shall include, at a minimum, testing for each hazardous waste contained in the waste stream, as identified by EPA RCRA hazardous waste code, and for each underlying hazardous constituent, as identified in Table C-1, Parameters and Methods for Pre-Acceptance Representative Sample Analysis. Additionally, parameters on Tables C-2, Tests and Analytical Methods for Fingerprint Samples, and C-3, Additional Tests and Analytical Methods, shall be included, as applicable.

For off-site generated wastes, in addition to the conditions specified above, representative sample analysis for each waste stream shall include testing for all constituents listed in 40 CFR § 268.48

using practical quantitation limits capable of measuring the standards specified in 40 CFR § 268.48. The results of this test shall be used to perform the comparison with the generator's Waste Profile Form specified in the Representative Sample Assessment Section (Waste Analysis Plan Condition C.3.3). Testing for all constituents listed in 40 CFR § 268.48 shall not be required for the annual analyses.

Hazardous debris, as defined in 40 CFR § 268.2(g), that has already been treated to meet the LDR treatment standards as described in 40 CFR § 268.45 does not have to meet the representative sample analysis requirements, if the Facility determines that the generator provided waste characterization information that demonstrates that the proper EPA RCRA Hazardous Waste Numbers were applied and indicates whether or not the LDR treatment standards have been met.

C.5.3 Initial Five Shipments and Annual Analysis

The representative sampling and analyses for each waste stream from each generator shall be conducted on the initial five shipments at an independent analytical laboratory other than the laboratory used by the generator (Section C.4.3.c). The representative sample analyses for each waste stream from each generator shall, at a minimum, be repeated annually. (Section C.4.3.b).

C.5.4 Fingerprint Analysis

Fingerprint samples shall be analyzed for all parameters listed on Table C-2 and may include tests for physical appearance and pH. Additional fingerprint parameters shall be selected based on the pre-acceptance waste characterization data, shipment records, physical form of the waste, and the visual inspection of the contents of containers and bulk waste. The Facility shall follow the additional parameter selection process described in Section 2.2 of the EPA guidance document, *Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes.*

Based on the detailed chemical and physical properties of a waste, additional necessary and appropriate fingerprint or spot-check parameters shall be chosen to verify that the waste fingerprint analysis includes, at a minimum, the parameters to confirm the waste received is the waste stream identified by the generator. These parameters shall either be analyzed at the on-site laboratory or at an off-site analytical laboratory. Analyses that are not within the on-site laboratory's capability shall be sent to an independent laboratory for analysis.

Fingerprint analysis shall also include all parameters necessary to ensure that the waste is within the Facility's regulatory and operational acceptance limits (Table C-3). To select these additional sample parameters, the Facility shall consider:

i. compliance with applicable regulatory and permit requirements (may require selection of parameters not reported by the generator);
ii. identification of incompatible and inappropriate wastes; and
iii. process and design considerations.

Fingerprint analysis is intended to minimize the potential for receiving waste that is unacceptable. Therefore, the level of additional analyses required for a waste shipment is a function of Facility

knowledge about the waste generation process and the waste generator. The Facility may elect to perform additional fingerprint tests to attain a higher level of confidence that a full waste characterization has been achieved. If discrepancies are noted between the received waste and the Waste Profile Form, the waste shall be analyzed further using additional fingerprint parameters. Discrepancies that can result in the Facility requiring additional analysis include, but are not limited to, non-conformance with the results of required testing or a change in color, texture, liquid content, or other characteristics that can be observed upon receipt.

The Facility shall follow the additional parameter selection process described in Part 2 of this Permit, and Section 2.4 of the EPA guidance document, *Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes (EPA, OSWER April 2015)*.

C.5.5 Overview of Waste Management Procedures in the Permitted Hazardous Waste Management Units

Upon completion of the fingerprint analysis, and supplemental analyses, if conducted, waste will be transferred to the appropriate staging area. Prior to final disposition of the waste, however, additional analyses may be required to ensure that requirements for the storage unit or Sub X treatment units are met.

Analysis necessary for disposal is generally conducted as part of the pre-acceptance procedure (Section C.7.2). Appropriate parameters shall be selected from Tables C-2 and C-3. The Facility will use a combination of process knowledge and analytical results to obtain the information needed prior to placing waste in the storage Units. The Facility may elect to use other EPA-approved analytical methods, if it is felt that information other than that obtainable by these methods is needed to manage the waste safely.

The Facility shall conduct compatibility tests as part of the representative sample analysis procedure on an incoming waste stream and other waste streams with which it may be combined.

C.5.6 Waste Analysis for Hazardous Wastes Generated On-Site

The Facility is expected to generate some waste on-site through day-to-day Facility operations. These on-site generated wastes include personal protective equipment, sludge, solids, liquids, and/or releases of hazardous waste to the environment (see Table C-4).

TABLE C-4. Potential On-Site Generated Waste

Area	Method of Generation	Waste Form
Operations	Personal protective equipment (PPE) contaminated during routine and non-routine operations	Solid
Site Operations	Spill residues primarily from waste handling operations. Sampling activities.	Liquid, Sludge, Solid

Waste generated on-site shall be assumed to be RCRA-regulated until process knowledge and/or sampling and analysis can be used to determine the actual nature of the waste. Sampling and analysis shall be accomplished in accordance with the requirements of this WAP.

The Facility shall select waste analysis parameters that are appropriate to confirm the identity of waste streams generated at the Facility. The selection of waste analysis parameters will typically be based on knowledge of the physical and chemical processes that produced the waste stream. If there is doubt as to the specific source, the Facility shall use the waste tracking system to identify all possible sources and to develop a list of specific parameters for laboratory analyses. Acceptable knowledge and analytical testing shall be used to ensure compliance with LDR requirements and provide waste compatibility and other information to determine appropriate waste management practices. The Facility shall ensure that all on-site generated waste sent to the container storage or treatment unit/s meets all LDR treatment standards.

The Facility will produce some waste on-site from day-to-day operations (e.g., paint and paint strippers, laboratory chemicals and equipment, vehicle maintenance wastes). This waste shall be characterized using acceptable knowledge or waste analyses, if the source cannot be definitively determined. If it is hazardous waste and meets all disposal requirements, it may be placed in the container storage unit. If it does not meet the requirements for storage or treatment or if it is not hazardous waste, it will be sent off-site for treatment or disposal.

C.6 SAMPLING PLAN FOR ON-SITE GENERATED WASTE

The Sampling Plan for on-site generated waste is based upon the guidance provided in RCRA Waste Sampling Technical Guidance, which is in an updated Part 2 of SW-846 and includes the regulatory and technical objectives identified in this WAP. Modifications to the Sampling Plan to include detailed sampling protocols specific to the site activities will be required to reflect the sampling to be performed on on-site generated waste during operation of the Facility.

The sampling program shall account for all types of waste constituents and waste matrices that may be encountered. The Facility shall identify the protocols by which sample locations will be selected and the methods most appropriate for collecting samples from the different waste streams.

The latest revision of SW-846, ASTM or other approved methods shall be used, and site procedures shall be revised as necessary to incorporate the new requirements. General sampling methods and collection techniques, QA/QC procedures, sample preservation, volume and holding times, and equipment decontamination, are discussed in Sections C.6.1 through C.6.7.

C.6.1 Sampling Methods for On-Site Generated Waste

Sampling methods shall follow Appendix I of 40 CFR, Part 261 unless a more appropriate method is identified. Table C-5 lists general waste matrices and appropriate sampling methods that will be used at the Facility.

Matrices that will be sampled include viscous liquids/sludges, crushed/powdered material, rock/rock-like material, soil, and fly-ash-like material. The methods and equipment used for sampling wastes must be appropriate for the form and consistency of the material to be sampled. The matrices will be sampled using a variety of sampling tools (see Table C-5), including, but not limited to, a dipper (sludge/viscous liquid), thief (sludge/viscous liquid), scoop (sludge, powdered material, rock/soil material, fly-ash material), shovel (powdered material, rock/soil material), auger (soil/fly-ash-like material) and tube sampler, for example a Composite Liquid Waste Sampler (COLIWASA) for sampling fly-ash like materials and containerized liquid wastes. The Facility shall select the appropriate sampling method from Table C-5 based upon the sample matrices, chemical constituents within the sample, and sampling conditions. If a sampling method not presented on Table C-5 would be more appropriate for the specific matrices to be sampled given site-specific conditions or if the procedures presented below must be modified, an alternative method may be used. If an alternative method is used, the sampling method shall be well documented, justified, placed in the Operating Record, and approved by NMED prior to implementation.

TABLE C-5. Sampling Methods

Waste Matrix	Sampling Method	Sampling Equipment
Sludge	ASTM D140-70	Scoop
Crushed or powdered material	ASTM D346-75	Scoop, shovel, tube sampler
Soil or rock-like material	ASTM D420-69	Scoop, shovel, auger
Soil-like material	ASTM D1452-65	Scoop, shovel, tube sampler
Fly ash-like material	ASTM D2234-76	Tube sampler, auger, scoop, shovel
Fly-ash like materials and Liquids	ASTM D5495	**Co**mposite **Li**quid **Wa**ste **Sa**mpler (COLIWASA)

Sampling equipment shall be compatible with waste, and shall generally be made of glass, steel, brass or Teflon. Decontamination procedures shall be conducted in accordance with Permit Part 7, Section 8.2.14 (Decontamination Procedures).

C.6.1.2 Sampling with a Tube Sampler and a COLIWASA

Tube samplers are used to collect soil/solid samples and are generally glass or steel tubing that can be inserted into relatively compact matrix. (Modified tube samplers, however, can be used for liquid sampling.) Following insertion of the tube, the tube is extracted with the sample contained in the inserted tube. The following general process shall be used to sample with the tube sampler:

i. clean/decontaminate the sampler.
ii. lower/insert the tube into the waste to the desired depth.
iii. when the desired depth is reached, slowly withdraw the tube, taking care to retain as much sample with the tube as possible; and
iv. extract the sample into the appropriate sample container.

C.6.2 Sample Collection Procedures

This section discusses the general sampling procedures for each type of sample to be collected at the Facility, as presented in Table C-6. It is recognized that the specific sampling that will take place at the Facility may differ from the general procedures included herein based on the specific conditions, and whether approval by NMED is required before revisions may be implemented.

C.6.2.a Annual Sampling

Wastes that underwent representative sampling prior to initial waste shipment shall undergo annual sampling to confirm waste composition. The Facility shall assess the representative sampling procedure prior to initial waste acceptance, and this same representative sampling procedure shall be used for annual sampling. Annual sampling shall follow the representative sampling process performed prior to initial waste shipment. If the process is modified, the Facility shall reassess the sampling process to ensure collection of a representative sample and place this assessment in the Operating Record.

C.6.2.b On-Site Generated Hazardous Waste Types

Several wastes may be generated on-site that require sampling and analysis (see Table C-4). Specifically, treated waste, day-to-day generated waste (e.g. personal protective equipment), releases of wastes, run-on/run-off, investigation-derived waste, and contaminated soil shall be considered on-site generated waste.

C.6.2.c Container Storage

All incoming waste streams to the Container Storage Units shall be sampled to ensure continued compliance with LDR requirements. The initial five shipments of each waste stream from each generator shall be sampled and subsequent sampling shall be conducted on an annual basis. The Facility shall also conduct stratified random samples and analyze a minimum of 10 percent of incoming waste streams that are to be sent to a permitted facility for disposal, to verify conformance with the LDR requirements. These additional samples shall be analyzed for the specific regulated hazardous constituents contained in the hazardous waste stream. The data generated from these samples, in conjunction with the generator-supplied data, shall be used to verify conformance with the LDR requirements. Sampling procedures shall follow those presented in Sections C.6.2, and Table C-6, as applicable.

TABLE C-6: Off-Site and On-Site Sample Collection Activities and Frequencies

Sample Type	Matrix	Collection frequency	Comments
Off-Site Incoming Waste Fingerprint sample	All incoming sludge and solids. Debris waste will not be fingerprinted	One per shipment for bulk shipments 1/10 drums for drummed waste	Table C-2 defines base fingerprint analysis required
Annual sample	All incoming sludge and solids; debris waste will not be sampled (Acceptable knowledge will be used)	One sample annually for each waste stream that underwent representative sampling prior to initial shipment	Table C-1 defines base representative analysis required. Sampling to be performed at the generator site.
Spills/releases	Spilled waste and contaminated material (sludge, liquid, soil)	Each release	For hazardous waste determination
	All incoming sludge and solidified solid waste; except debris for which acceptable knowledge will be used	Initial five shipments of each waste stream from each generator and subsequent random sampling of waste slated for disposal in a permitted off-site facility landfill.	To verify LDR status
On-Site Generated Waste	1. Treated waste 2. Day-to-day operations 3. Releases 4. Run-on/runoff 5. Investigation-derived waste 6. Soil 7. Air	1,2. When acceptable knowledge is not available 3,4. Each Release and each Run-on/run-off 5. Each container 6. Contingency Plan implementation or other spill response procedure	To determine hazardous waste and LDR status. See Table C-5 for specific waste matrices generated by on-site activities

C.6.4 Sample Types

Samples of the waste will be collected as either composite or grab samples. It is possible that the Facility may modify or augment the procedures discussed below for the collection of composite and grab samples before the Facility becomes operational; if so, these revisions must be approved by NMED prior to implementation.

In composite sampling, several samples are initially collected from a waste and blended into a single sample which is then analyzed for the constituents of concern. Composite sampling is acceptable for homogeneous samples and tends to minimize sample variation between samples. This allows for a reduction in the number of samples that must be analyzed to verify the contents of a waste shipment. Composite samples can also be obtained from a waste that is stratified; however, the composite shall only be made from samples obtained from the same strata within the waste. Composite samples shall be collected using clean sampling equipment and such samples will be blended, unless VOCs are present, before analysis. If VOCs are present, separate discrete grab samples shall be collected for VOC analysis. Grab sampling shall be used to obtain samples of heterogeneous wastes.

C.6.5 Sampling Quality Assurance (QA)/Quality Control (QC)

Quality Assurance (QA) sampling procedures shall be conducted in accordance with the guidance provided in EPA SW-846 and EPA's *Waste Analysis at Facilities that Generate, Treat, Store and Dispose of Hazardous Waste*. The QA requirements shall be applicable to on-site sampling (e.g., system samples) as well as to the sampling of incoming waste shipments. This program is necessary to ensure that decisions regarding the acceptance and disposition of waste are based on valid and documented data. Additional QA procedures associated with sampling and analysis determined prior to initiation of on-site sampling will be included in the Operating Record.

The sampling QA program shall include the following:

- training requirements for personnel responsible for sample collection.
- chain-of-custody protocols for tracking samples.
- QA review of procedures to ensure proper use of equipment.
- protocols for equipment maintenance.
- identification of required sampling techniques for specific media.
- field sampling QC procedures; and
- documentation of sampling locations.

Deviations from the approved sampling program, sampling methods, or chemical analytical methods shall be documented and reviewed by personnel responsible for site QA. NMED shall be notified in writing of the QA exceptions, within seven days of the occurrence and measures shall be taken to correct the problems as soon as practicable.

C.6.5.a Training Requirements for Personnel Responsible for Sample Collection

All personnel and supervisory staff responsible for collecting waste samples for screening and chemical analysis shall be trained in the use of all sampling methods and equipment used at the site.

C.6.5.b Chain-of-Custody Protocols for Tracking Samples

The integrity of the sampling/analytical protocol shall be maintained by following chain-of-custody procedures from the point of sample collection through analytical data reporting to sample disposal. The possession and handling of samples shall be traceable from the time of collection through analysis and final disposition.

A sample is considered to be in a person's custody if it is:

- in a person's physical possession;
- in view of the person after taking possession; or
- secured in a container sealed by the responsible person so that it cannot be tampered with during transport to the designated destination or during storage after being secured by that person in an area of restricted access.

The sampler shall place a sample label on each sample container. The label shall include the following information:

- sample number, a unique identifier that is traceable to the waste stream and shipment;
- name of collector (sampler);
- date and time of collection; and
- place of collection.

Labels shall be affixed to sample containers prior to or at the time of sampling and shall be filled out at the time of collection.

Sample chain-of-custody seals are required if the sample is designated to leave the possession of Facility personnel for transport to an analytical laboratory. The seal shall include the same information as the sample label. The seal shall be attached in such a way that it is necessary to break it in order to open the sample container. In addition, chain-of-custody seals shall be affixed to sample storage containers in a similar manner in order to prevent tampering prior to shipment from the Facility to off-site analytical laboratories. Samples and storage containers which require seals must be sealed prior to leaving the possession of Facility personnel.
To establish the documentation necessary to trace sample possession from the time of collection, a chain of custody record shall be filled out and shall accompany every sample.

If the sample is to be shipped off-site for analysis, it shall be accompanied by a sample analysis request sheet. The sample analysis request sheet will include the information necessary to identify the sample and the analyses requested by the Facility. Samples shipped off-site for analysis shall be packaged and shipped in accordance with DOT transportation requirements.

Laboratory samples shall be maintained in a secure area and retained until holding times expire, as listed in SW-846. After the holding time has expired, samples shall be disposed of at the Facility with compatible waste batches. Records of the date the samples are removed from storage and the date and method of disposal shall be maintained at the Facility until completion of post-closure care. In cases where samples are not analyzed within their holding times, the Facility shall resample.

C.6.5.c QA Review of Procedures to Ensure Proper Use of Equipment

Standard operating procedures shall be developed for the selection, use, decontamination, and storage of sampling equipment used to characterize waste shipped to the Facility. The standard operating procedures shall include the sampling equipment to be used, instructions for use, and the applications for use of the equipment for collection of samples from specific media and types of shipping containers. The procedures and QA standards for waste sample collection shall be included in the standard operating procedures.

C.6.5.d Protocols for Equipment Maintenance

The protocols for equipment maintenance shall be included in the standard operating procedures. Protocols will be developed, as described in the preceding paragraph, for use, decontamination, and storage of equipment. Protocols for equipment maintenance shall be included in the standard operating procedures (See Section C.6.7 for general decontamination requirements).

C.6.5.e Identification of Required Sampling Techniques for Specific Media

The sampling methods and equipment used for collecting samples from specific media shall be selected in accordance with the guidelines included in 40 CFR, Part 261, Appendix I, and in the EPA guidance manual, *Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Waste, Chapter 2*. Alternative sampling methods may be used with prior approval from the NMED.

C.6.6 Sample Preservation, Volumes, and Holding Times

Table C-7 presents general preservation, container, and holding time information for samples collected. EPA SW-846 guidelines have been used to determine these general requirements, although these may be modified or augmented to account for specific conditions, waste-specific requirements, waste-container compatibility considerations, or additional waste parameters for analysis. Method-specific sample volumes and containers appropriate for the sampling event will be determined by the Facility. Prior to any sampling event, sample container labels shall be prepared and affixed to sample containers, and all sample containers shall be certified clean by the supplying laboratory. Sample labels shall identify, at a minimum, sample number, date, sampler, matrix, analyses to be performed, and sample preservation. Once collected, samples shall be placed immediately into the shipping container (i.e., cooler), and chain-of-custody documentation shall be filled out (Section C.6.5.b).

TABLE C-7
Requirements for Sample Matrix Container Type, Preservation, and Holding Time

Sample Matrix	Concentration	Fraction	Volume	Container Type	Preservative	Holding Time
			INORGANICS			
Soil, Sludge, Sediment, and Residue	Low/Medium	Total Metals	6 oz	F or G	Cool to 4^0C	6 months
			ORGANICS			
Soil, Sludge, Sediment, and Residue	Low/Medium	VOCs	240 mL	D	Cool to 4^0C	14 days
		SVOCs	3oz	F or G	Cool to 4^0C	14 days for extraction, 40 days after extraction to analysis
		Petroleum hydrocarbons	**3 oz**	F or G	Cool to 4^0C	15 days for extraction, 40 days after extraction to analysis

Note: The above table is general in nature and may be modified or augmented, so long as the requirements are congruent with SW-846 requirements.
a Container types are as follows, if applicable:
D = 120-mL glass septum vial with Teflon-lined, white poly cap or Encore® sampler or equivalent
F = 8-oz wide-mouthed glass jar with Teflon-lined black poly cap
G = 4-oz wide-mouthed glass jar with Teflon-lined, black poly cap

C.6.7 Equipment Decontamination

Reusable sampling equipment shall be decontaminated prior to use in accordance with Permit Part 7, Section 8.2.14. In general, decontamination of sampling equipment typically includes initial scrubbing with a biodegradable commercial detergent, followed by a tap water rinse and subsequent de-ionized water rinse. The decontamination process shall include wiping or scrubbing of sampling equipment to remove surface residue, followed by detergent wash, rinse, a second detergent wash, and second rinse. Modifications to this process may be required to account for site/contaminant conditions and may take place so long as the decontamination procedure is well documented and appropriate supporting information is placed in the Operating Record.

C.7 ANALYTICAL METHODS

Analytical methods which the Facility will use for specific tests are identified in the waste analysis tables (Tables C-1 through C-3). All analytical methods used in conjunction with this WAP must be EPA-approved methods or methods required by the New Mexico hazardous waste management regulations. If there is no equivalent EPA-approved method, an ASTM method or other NMED-approved method may be used. If the Facility or a generator wishes to use alternate test methods, the Facility or generator must first demonstrate to the NMED that the proposed method is equal

to, or better than, the corresponding methods prescribed in 40 CFR Part 261 or Part 264, in accordance with 40 CFR § 260.21. Such demonstration shall be provided through a Permit modification request. All proposed alternative methods must achieve the appropriate data quality objective.

The Permit Modification request must include the following information:

i. a statement of the need and justification for the proposed action;
ii. a full description of the alternative method (i.e., a standard operating procedure) including all procedural steps and equipment used in the method;
iii. a description of the types of wastes, or waste matrices, for which the proposed method may be used;
iv. comparative analytical data obtained from using the proposed method with those obtained from using the corresponding methods;
v. a demonstration that the proposed analytical procedure is equal to, or superior to, the corresponding methods in terms of its sensitivity, accuracy, and precision (i.e., reproducibility);
vi. an assessment of any factors which may interfere with or limit the use of the proposed method; and
vii. a description of the QA/QC procedures necessary to ensure the sensitivity, accuracy, and precision of the proposed method.

An example of a non-EPA method required by hazardous waste regulations are the ASTM tests specified in 40 CFR § 264.314(e)(2) to determine the presence of non-biodegradable sorbents.

C.7.1 Duties of the Laboratory Manager

The on-site laboratory manager shall have the following responsibilities to ensure an effective quality assurance program:

i. ensuring that laboratory personnel are adequately trained to perform sampling and analytical procedures and in safety procedures;
ii. ensuring that equipment and instrumentation under his or her control are calibrated and functioning properly;
iii. coordinating internal and external assurance audits;
iv. reviewing procedures and QA plans of outside laboratories used. QA/QC practices shall be considered during the selection of independent analytical laboratories. QA/QC practices that will be reviewed shall include written procedures, certification, internal and external audits, personnel training, and chain-of-custody procedures; and
v. development, updating, and implementation of the laboratory QA plan.

C.7.2 Facility Laboratory QA/QC Plan

Prior to beginning operations, the Facility shall develop procedures that will comprise the laboratory QA/QC plan. The Facility shall develop a QA manual for operation of the on-site laboratory. The manual shall be submitted to NMED for review no less than 90 days prior to the initial receipt of waste.

The results of chemical analysis of waste samples generated by the on-site laboratory may not be used as part of the waste acceptance evaluation process prior to NMED's review of the QA manual.

The overall QA objective for measurement data is to ensure that data of known and acceptable quality are provided. All measurements will be made to yield accurate and precise results representative of the media and conditions measured. QA objectives for precision, accuracy, and completeness shall be established for each measurement variable, where possible, and shall be included in the QA manuals of the on-site and off-site laboratories where waste samples will be submitted for chemical analysis. The laboratory procedures, practices, and qualifications shall be included in the QA manual for each laboratory.

The laboratory QA manual shall be based on guidance provided in EPA's Requirements for Quality Assurance Project Plans for Environmental Data Operations (EPA QA/R-5). As such, the plan shall address the following key elements in compliance with EPA QA/R-5: project organization; laboratory quality assurance organization; data quality objectives and criteria; employee training and certification requirements; laboratory analytical methods; quality control requirements; laboratory equipment and instrumentation calibration, testing, inspection, and maintenance; QA/QC of suppliers and vendors; data acquisition requirements; data management; data review, validation and verification; and, reconciliation with quality objectives and criteria. These elements and other procedures included in this plan are discussed in the following sections:

i. laboratory quality assurance;
ii. equipment calibration;
iii. laboratory QA/QC samples;
iv. laboratory QC;
v. analytical procedures; and
vi. laboratory maintenance.

C.7.2.a Laboratory Quality Assurance

The Facility laboratory and each off-site laboratory shall maintain an internal quality assurance program, as documented in its laboratory quality assurance manual. The laboratories shall use a combination of blanks, surrogates, duplicates, matrix spike/matrix spike duplicate (MS/MSD), laboratory control samples, and blank spike/blank spike duplicate (BS/BSD), to demonstrate analytical QA/QC. Control limits shall be established for individual chemicals or groups of chemicals based on the long-term performance of the test methods. The specific procedures to be completed and the laboratory control limits shall be included in the QA manual for each laboratory.

C.7.2.b Equipment Calibration

The laboratory equipment calibration procedures, calibration frequency, and calibration standards shall be conducted in accordance with EPA (or equivalent method) specified test methodology requirements and will be documented in the laboratory's QA manual. All instruments and equipment used by the laboratory shall be operated, calibrated, and maintained according to

manufacturers' guidelines and recommendations. Operation, calibration, and maintenance shall be performed by personnel who have been properly trained in these procedures. A routine schedule and record of instrument calibration and maintenance shall be kept on file at the laboratory.

C.7.2.c Laboratory QA/QC samples

Analytical procedures shall be evaluated by analyzing reagent or method blanks, surrogates, MS/MSDs, BS/BSDs, and/or laboratory duplicates, as required or appropriate for each method. The laboratory QA/QC samples and frequency of analysis to be completed shall be in accordance with EPA or equivalent method protocols and shall be included in the QA manual for each laboratory.

The laboratory QA manuals and procedures shall incorporate data quality objectives (DQOs) to verify that waste characterization data obtained by the methods established in this WAP meet regulatory requirements with regards to regulatory compliance and Facility waste management requirements. The following DQOs are established for the sampling and analysis of waste managed by the Facility:

i. identify and quantify the hazardous constituents in the waste to ensure compliance with 40 CFR Part 264 and the requirements of the Facility permit, and
ii. compare the contaminant concentrations in the waste with the specified characteristics of 40 CFR Part 261 in order that the waste may be managed in accordance with Facility requirements.

To ensure that the laboratory data quality objectives are met, the following analyses shall be completed in the laboratory to monitor the analytical process:

- *Laboratory duplicate samples*: Laboratory duplicate samples will be analyzed to monitor for intra-laboratory precision of data generated. These samples shall be analyzed at a rate of no less than 5% (1 for every 20 samples) of the total samples with at least one duplicate if fewer than 20 samples are analyzed for any parameter;

- *Spiked samples (Matrix Spike/Blank Spike):* Spiked samples shall be analyzed to monitor analytical precision. Spiked samples will be tested on no less than a five percent (1 for every 20 samples) basis for any parameter. At least one spiked sample shall be run if fewer than 20 samples are analyzed;

- *Control charts:* Control charts shall be utilized to establish laboratory control limits to monitor and review the accuracy of the data generated as a result of spike analyses. Control limits reflect long-term data accuracy trends and must be modified as new data are acquired;

- *Method/reagent blanks:* Method/reagent blanks shall be prepared using samples of purified water or reagents that shall then be subjected to the entire sample analytical procedure to monitor potential contamination of samples due to contamination in the

laboratory or laboratory equipment. Method or reagent blanks shall be included with each set of samples;

- *Laboratory equipment blanks:* Laboratory equipment blanks shall be analyzed to monitor potential contamination of samples due to improper or ineffective cleaning of equipment. These samples shall be analyzed at a rate of no less than 5 percent (1 for every 20 samples) of the total samples;

- *Quality control samples:* QC samples shall be analyzed to monitor for accuracy of data generated. EPA QC samples or samples purchased from a reputable independent source shall be submitted to off-site laboratories as blind samples for chemical analysis of a set of selected analytes approved by NMED at the beginning of the Facility operation and at regular intervals during the Facility operating life;

- *Surrogates:* Surrogates shall be analyzed in accordance with EPA guidelines for organics analysis. Surrogate recovery is a measure of the effectiveness of the analytical process. Surrogates shall be tested on no less than a 5 percent (1 for every 20 samples) basis for any analysis of organic compounds;

- *Calibration standards and devices:* Calibration standards and devices shall be used in accordance with the manufacturers' recommended guidelines to calibrate laboratory instrumentation; and

- *Internal standards:* Internal standards prepared in the laboratory shall be referenced against external standards to measure accuracy.

  Laboratory QC procedures shall be included in the laboratory QA manuals prepared by each laboratory.

C.7.2.d Laboratory Quality Control

Quality Control objectives for the analytical data are a means of checking and controlling the sources of error in analytical data results. The criteria for data evaluation include assessing the data accuracy, precision, completeness, representativeness, and comparability. The criteria are described below:

- *Accuracy:* Accuracy is a measure of the error between chemical analytical results and the true sample concentrations. Accuracy is a measure of the bias in a system and will be expressed as the percent recovery of spiked samples. Accuracy will be presented as percent recovery and shall be calculated as follows:

  $$\%R = (S-U)/Csa \times 100$$

  Where %R = percent recovery

  S = spike sample analytical result

U = sample analytical result

Csa = known or actual spike concentration

The DQOs for accuracy for each analytical method shall be presented in the laboratory QA manual.

- *Precision:* Precision is a measure of data variability. Variability can be attributed to sampling activities and/or chemical analysis. Relative percent difference (RPD) will be used to assess the precision of the sampling and analytical method and shall be calculated as follows:

  RPD = [C1 - C2/(C1 + C2)/2)] x 100

  Where RPD = relative percent difference

  C1 = larger of the two concentrations

  C2 = smaller of the two concentrations

  The DQOs for precision for each analytical method shall be presented in the laboratory QA manual.

Completeness: Completeness shall be evaluated to assess whether enough valid data is obtained. Completeness is described as the ratio of acceptable measurements. Completeness will be calculated as follows:

C = (Number of samples having acceptable data)/(total number of samples analyzed) x 100%

where C = completeness

The DQOs for completeness shall be presented in the laboratory QA manual.

- *Representativeness:* Representativeness is a qualitative parameter related to the degree to which the sample data represents the specific characteristics of concern. Procedures in sample collection will be implemented to assure representative samples, such as repeated measurements of the same parameter from the same waste stream in the same shipping container over several distinct sampling events. Any procedures or variations that may affect the collection or analysis of representative samples shall be noted and the data qualified as appropriate.

- *Comparability:* Comparability is a qualitative parameter related to whether similar sample data can be prepared. To ensure comparability, analytical results shall be reported in appropriate units for comparison with other data (such as past studies or clean-up

standards), and the standard collection and analytical procedures included in this WAP shall be implemented. Any procedures or variations that may affect comparability shall be noted, and the data will be qualified as appropriate.

C.7.2.e Analytical Procedures

Specific QA/QC procedures to be used for sampling, chain-of-custody, calibration, analytical methods, reporting, internal QC, audits, and preventive maintenance shall be included in the laboratory QA manual.

Laboratory procedures and methods to be used shall contain all of the information presented in the EPA document, SW-846, for each method. The format for each method shall be similar to that used in SW-846. If there is no appropriate SW-846 method ASTM or other approved methods will be employed. The laboratory procedures and methods also shall include the following:

- *Scope:* A description of the scope of applicability of the procedure;
- *Principal:* A brief description of the steps to be taken and/or the theory involved in the laboratory analysis;
-
- *Interference:* A description of known interfering agents that would cause difficulty in the laboratory analysis;
-
- *Apparatus:* A listing or description of equipment required to perform the laboratory analysis;

- *Reagents:* A listing of the reagents required, a description of the steps involved in preparing the reagents, and instructions on storage requirements and retention times;

- *Procedures* (instructions): An enumeration of the sequence of activities to be followed. The topics include sample preparation or pretreatment, sample storage requirements, instrument set-up, standardization or calibration, sample analysis, calculations, and glassware-cleaning procedures. The procedure shall include any precautions, explanation, or clarifications needed to properly perform the analysis. These include safety precautions, the frequency of standardization required, the acceptance criteria or procedures for determining the acceptability of standard curves, clarification or special techniques critical to the analysis, and the procedure the analyst uses to determine the reliability of sample results based on the standard curves;

- *Quality control requirements:* A listing of the QC checks to be performed and the acceptance criteria used to evaluate the QC data; and

- *Reference:* A listing of the publications from which the information was derived in preparing the laboratory method. All references pertaining to these documents. As a rule, laboratory methods are derived from the following publications:

- Standard Methods for the Examination of Water and Wastewater, American Public Health Association;
- Annual Book of Standards, American Society for Testing and Materials;
- Methods for Chemical Analysis of Water and Waste, US Environmental Protection Agency;
- Test Methods for Evaluating Solid Waste, SW-846, US Environmental Protection Agency;
- National Functional Guidelines for Organics Data Review; and
- Laboratory Data Validation Functional Guidelines for Evaluating Inorganic Analyses.

Editions used shall be those currently specified in the latest 40 CFR, as updated.

C.7.2.f Laboratory Maintenance

The analytical laboratory shall have in place a procedure that details the steps to be taken to calibrate and standardize instruments to ensure that the analytical data produced are accurate. Records of all calibrations, preventive maintenance, and service calls shall be available upon request from the laboratory files. Calibration procedures shall follow the method procedures outlined in the EPA document, SW-846, or the ASTM Standards.

A procurement procedure that identifies methods to be used to document and control the purchase of materials, parts, and services shall be implemented by the laboratory and be presented in the laboratory QA manual. The procedure shall include identifying the quality of laboratory chemicals and equipment, management approval of procedure items, inspection of shipments for compliance with requirements, and isolation of nonconforming items to be returned to vendors. Equipment quality shall conform to the requirements specified in the most current edition of the EPA document, *Handbook of Analytical Quality Control in Water and Wastewater Laboratories, the Federal Register*, or other regulatory agency publications. This procurement procedure shall serve to ensure that routinely required spare parts are readily available.

C.7.3 Requirements for Off-Site Laboratories

The Facility shall document that the following conditions are met for each off-site laboratory performing waste analyses for the Facility:

i. the laboratory used by the Facility shall be different from the laboratory used by the generator;

ii. the laboratory must be approved by the Facility;

iii. the laboratory must use the analytical methods identified in Section C.5;

iv. if there is more than one analytical method for a specific test identified in Section C.5, the laboratory must follow the guidance in Chapter Two of the current version of EPA document SW-846 to determine the appropriate analytical method; and

v. the laboratory must follow the QA/QC requirements described in this WAP.

C.7.4 Laboratory Requirements for Off-Site Generators

The Facility shall ensure and document that all laboratory analyses provided by Off-Site generators is performed by a laboratory accredited or certified for the appropriate hazardous waste field of testing by an authority using the EPA's National Environmental Laboratory Accreditation Conference standards.

C.8 WASTE TRACKING

To identify and track the waste managed at the Facility, a Facility-specific number shall be assigned to each waste stream and to each shipment within that waste stream. Each waste shipment shall be tracked using a unique alphanumeric designation. This designation shall identify the generator, a sequential number specific to the shipment, substance and source and the delivery date (or, in the case of site-generated waste, the date the waste entered the system). An example is presented below:

ABC-0001-073113

where ABC identifies the generator

0001 identifies the waste stream, source, and shipment

073113 is the date the waste was delivered

The waste numbering system will assist in the tracking of waste as it moves through the Facility. The number shall be recorded on:

i. all incoming paperwork from the generator;
ii. samples received from the generator;
iii. samples collected on-site (that also shall have unique identifiers; and
iv. site-generated records.

The date shall not be recorded until the waste arrives on-site. This numbering system will allow the Facility to track a specific waste with regards to the final disposition of the waste. In addition, assigning a unique designation to each generator and a unique number to each waste stream from that generator shall make possible determining the amount of waste from a given waste stream that has been received by the Facility. Individual shipments from within the waste stream shall receive an additional unique identifier to enable the Facility to tie information back to the specific shipment

as well as to the waste stream to allow the Facility to locate the current location of the waste in the container storage area.

Tracking waste in this manner shall be used by the Facility to determine the efficiency and accuracy of a generator's profiling efforts and the rejection rate for incoming waste and to assist in determining the rate of fingerprint analysis required for a given generator.
The Facility number shall designate waste generated on-site. All other numbering and tracking shall be same for all waste managed at the Facility. The tracking system shall be maintained in the Facility Operating Record.

C.9 NOTIFICATION, CERTIFICATION, AND RECORDKEEPING

The Facility shall maintain a Facility Operating Record in accordance with 40 CFR § 264.73.

The Operating Record will include:

i. all analytical results;

ii. all chain-of-custody forms;

iii. generator notices of restricted wastes not meeting treatment standards or exceeding levels specified in RCRA Section 30049(d), including the information listed in 40 CFR § 268.7(a)(1);

iv. generator notices of restricted wastes meeting applicable treatment standards and prohibition levels, including the information in 40 CFR §268.7(a)(2).

v. all final disposition records;

vi. all manifest and waste discrepancy resolution documentation; and

vii. all other information (e.g., notifications, certifications, waste analysis reports, waste movements) which will be maintained in the Operating Record as noted in this WAP.

As required in 40 CFR § 268.7, the following records shall be maintained at the Facility for wastes generated on-site, and/or documentation of treating restricted wastes:

i. where on-site generated wastes are characterized to determine compliance with LDR standards using only process knowledge, all data used to make any such determination. These data shall be maintained in the Facility Operating Record;

ii. where a representative sample of waste is analyzed to determine compliance with LDR standards, all waste analysis information. These data shall be retained on-site in Facility Operating Record; and

iii. all notifications and/or certifications submitted by waste generators. These records shall be maintained until Facility closure as required in 40 CFR § 264.73.

In addition, relevant inspection forms and monitoring data shall be maintained on file at the Facility. Files will be maintained for a minimum of three years (for inspection records and LDR notification), or until approval of Facility closure (for inventory records).

C.10 ORGANIC AIR EMISSION REQUIREMENTS

The Permittee manages wastes that are subject to organic air emissions requirements of 40 CFR Part 264, Subpart CC. For wastes that are not eligible for exemption, the Permittee shall address the applicable requirements for control of air pollutant emissions as follows:

1. In lieu of determining the concentration of VOCs in a waste at the point of generation, the Permittee may declare that a container holding the waste is subject to the requirements of 40 CFR Part 264, Subpart CC.

2. To determine the VOC concentration, the Permittees shall follow the waste determination procedures specified in 40 CFR 264.1083(a). If sampling and analysis are necessary, it shall be performed in accordance with the methods specified in this Permit Attachment.

3. Whenever changes to the source generating the waste are reasonably likely to or may potentially cause the average VOC concentration of the hazardous waste to increase to a level that is equal to or greater than the applicable VOC concentration limits specified in 40 CFR § 264.1082, a new waste evaluation shall be performed by the Permittee, as specified in 40 C.F.R. § 264.1083(a)(1)(ii).

4. The Permittee shall review the characterization documentation for VOCs as part of the characterization process discussed in Section C.3 of this Permit Attachment.

5. Characterization of routinely generated hazardous wastes that are subject to 40 CFR Part 264, Subpart CC shall be reviewed and updated at least once every 12 months to determine whether Subpart CC requirements continue to apply.

C.11 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is a permit modification and shall be implemented in accordance with the applicable procedures included in 40 CFR §270.42.

PERMIT ATTACHMENT D CONTINGENCY PLAN

D.1 PURPOSE

This Contingency Plan describes the actions to be taken in the event of a spill, fire, explosion, or other emergency, such as 100-year flooding.

The Contingency Plan shall be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment. The Contingency Plan shall be kept at the Facility Office. The Branch Manager shall ensure that the Contingency Plan is updated whenever a change is made. Modifications to this Contingency Plan shall be conducted in accordance with 40 CFR § 270.42.

D.2 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan shall be kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document shall be provided to the Albuquerque Fire and Police Departments, the Presbyterian Hospital, Lovelace Main Hospital, and Lovelace Women's Hospital. They may be called upon to provide emergency services. In addition, this contingency plan and all revisions to the plan shall be made readily available to employees working at the facility.

The plan shall be reviewed and updated whenever:

a. The facility is modified to allow new 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 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 jobs; or
f. The plan fails when implemented in an emergency.
g. Other changes if a deficiency is identified.

D.3 EMERGENCY RESPONSE PERSONNEL

D.3.1 Emergency Coordinator Responsibilities

The ACT LLC Albuquerque Facility Manager is the Emergency Coordinator (EC); and the First and Second Alternate Emergency Coordinators are trained employees designated to those positions by the Facility Manager. However, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan.

The Emergency Coordinator and Alternates must be familiar with all aspects of this Contingency Plan, the operations and activities at the facility, the location and characteristics of hazardous waste managed, treated, and stored 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 numbers are listed in Table D.1. At least one employee shall be at the facility or on call to respond to an emergency. A list of emergency equipment available at the facility is included as Table D.3. In addition, facility personnel shall be aware of the location of emergency equipment.

D.3.1.1 Assess the Situation

Whenever there is a release, fire, or explosion, the Emergency Coordinator must immediately 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. In the event of a fire, or explosion or release of toxic gas, the Emergency Coordinator must immediately contact emergency responders (e.g., Albuquerque Fire Department).

D.3.1.2 Protection of Personnel

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).

D.3.1.3 Contain or Mitigate Hazards

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

D.3.1.4 Post-Emergency Actions

After an emergency has been mitigated and otherwise addressed, the Emergency Coordinator must ensure that all facility equipment and response equipment is properly cleaned and decontaminated (if reusable), and that all waste, spill recovery material and disposable equipment is properly managed and disposed.

TABLE D.1:
Emergency Coordinator (EC) List for the Facility

Facility Emergency Coordinators, Alternate EC, and their Office addresses

Primary	**Alternate**
Phil Ortega 6137 Edith Blvd. NE Albuquerque, NM 87107 Main (office) Phone (505) 349-5220 Cell Phone (505) 459-3164	Chris Gwash 6137 Edith Blvd. NE Albuquerque, NM 87107 Main (office) Phone (505) 349-5220 Cell Phone (505) 379-9582

Home Addresses and Telephone Numbers of Primary EC and Alternate EC

Phil Ortega 6304 Sunray Rd. NW Albuquerque, NM 87120 Home Phone (505) 459-3164	Chris Gwash 1824 Carlo St. NE Albuquerque, NM 87112 Home Phone (505) 379-9582

Second Alternate EC and their Home Address (es)

James O'Hara 6137 Edith Blvd. NE Albuquerque, NM 87107 Main (office) Phone (505) 349-5220 Home Phone (505) 350-8760	James O'Hara 3905 Rancho Vistoso Albuquerque, NM 87120 Home Phone (505) 350-8760

External

National Response Center	(800) 424-8802
New Mexico Environment Department	(505) 476-6000; (505) 827-9329 (24 Hour)

Designated Emergency Response Authorities

Albuquerque Fire Department (emergency)	911; Station #19 [Non-emergency (505)888-8100]
Albuquerque Police Department (emergency)	911; [Non-emergency (505) 242-2677]
Presbyterian Hospital (emergency)	(505) 222-2995; [Non-emergency (505) 841-1234]
Lovelace Women's Hospital	911; (505) 727-7800
Poison Control Center	(505) 843-2551

D.3.2 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is shown in Table D.1 (Emergency Coordinator List for the Facility), and explained as follows:

a. The person who discovers the emergency reports to the Emergency Coordinator. All ACT employees are instructed to activate the internal alarm system and evacuation alarm if the incident is an obvious immediate threat to Facility employees or the environment.

b. Based on the information gathered, the Emergency Coordinator will determine if the emergency warrants implementation of the Contingency Plan.

c. The Emergency Coordinator contacts the New Mexico Environment Department.

d. The Emergency Coordinator will act as an Incident Commander until an outside resource (i.e. Fire Department or Spill Cleanup Contractor) arrives onsite; then they will assume Incident Commander duties.

D.3.3 Government Agencies and Local Authorities to be notified during an Emergency

The following government agencies and local authorities listed in Table D.2 shall be notified during an emergency since the Facility has a Memorandum of Agreement with them:

TABLE D.2:
List of Government agencies and Local Authorities to be notified in an Emergency

Agency or Authority	Rationale / Service Provided
Albuquerque Police Department	Notify if there is imminent danger to human health. May assist with traffic control and evacuation (if required) if there is imminent danger to human health.
Albuquerque Fire Department	Notify is there is a fire, explosion, uncontrolled spill, or other imminent danger.
Presbyterian Hospital	Assist in providing emergency care of any injuries.
New Mexico Department of Public Safety	Notify if human health or the environment outside the Facility is threatened.
Lovelace Women's Hospital	Notify if human health or the environment outside the Facility is threatened.
National Response Center	Notify if human health or the environment outside the Facility is threatened.
New Mexico Environment Department	Report releases, fires, and explosions.

ACT shall familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous wastes and materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility and possible evacuation routes. Arrangements shall also be made to familiarize the local hospitals listed in Table D-2 with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

Notifications, including a copy of the Contingency Plan, shall be provided to local emergency response agencies via mail or email, and a signed acknowledgement form is requested from each entity. If an agency refuses to enter into an agreement, this shall be kept on file. Notification of any significant modifications to the Contingency Plan shall also be provided to these agencies.

D.4 RESPONSIBILITIES OF THE EMERGENCY COORDINATOR DURING AN EMERGENCY

Whenever there is an imminent or actual emergency situation that requires implementation of the Contingency Plan, the Emergency Coordinator (EC or alternate(s)) when the Emergency Coordinator is not available) must immediately:

a. Activate the internal facility communication system to notify all facility personnel and Initiate facility evacuation, if necessary.
b. Notify appropriate state or local agencies with designated response roles, as necessary and Reference Table D.2 above.

D.4.1 Emergency Response Procedures

Response actions to be taken in specific emergency situations are described in the following sections.

D.4.1.1 Fire Control Procedures

The following steps shall be implemented as needed in the event of an emergency involving an imminent or existing fire that could threaten human health or the environment:

1. All personnel shall evacuate the Facility following the evacuation routes described in Figure 9, Permit Attachment M (Figures) or to an alternate assembly location as directed by the EC. All personnel shall evacuate at this time.
2. The EC (or waste management personnel) shall immediately notify the City of Albuquerque Fire Department by dialing the EOC at 911. Medical response can also be requested at the same time if there are injuries involved.
3. Waste management personnel may consider taking action to put out the fire or minimize its spread only if safe. These actions may be taken only after the Incident Commander and Albuquerque Fire Department have been notified. Personnel must not jeopardize their own safety or the safety of other personnel.

4. If the fire is small and the fuel source is small, portable fire extinguishers may be used to put out the fire.
5. Fire extinguishers shall only be used by personnel trained in their use, and only for very small fires.
6. Flammable materials shall be removed from the area of fire if safe.
7. Only appropriate fire extinguishers and/or fire extinguishing agents shall be used for water-reactive waste (e.g., Met-L-X, Lith-X, or equivalent).
8. If the fire spreads or increases in intensity, all remaining personnel must evacuate.
9. The EC shall take actions as directed by the IC. Unless directed otherwise, the EC shall remain near the Facility, but at a safe distance, so he can advise personnel responding to the fire of the known hazards.
10. Upon arrival at a fire, the Albuquerque Fire Department officer-in-charge is in command of firefighting, and he retains the responsibility of selecting the fire-fighting methods and tactics.
11. Hazardous wastes involved in a fire can be identified in the following ways:

a) The location of the container may indicate the contents.
b) If the location does not indicate its contents, the label number can be used to identify the waste.
c) Records on the contents of each container can be accessed from outside the Facility or in the Unit office.
d) If the label has been burned and the container cannot be identified, the material or waste shall be treated as an unknown and analyzed according to the methods described in the Waste Analysis Plan under Permit Attachment C.

12. Spills of hazardous wastes shall be collected and contained by stabilizing or neutralizing the spilled waste, as appropriate; pouring an absorbent over the spilled waste; and sweeping or shoveling the absorbed waste into drums or other appropriate containers.
13. Surfaces affected by released hazardous wastes shall be cleaned using cleaners appropriate to the wastes.
14. If possible and safe, responding personnel shall take measures to contain potentially hazardous run-off and keep it away from storm drains or sewers (for example, by building dikes around storm drains).
15. Any fire-fighting waters collected in the storm water catchment and retention ponds or the floor trenches and secondary containments at the building shall be analyzed to determine the appropriate method for management and subsequent disposal of the wastewater.

D.4.1.2 Container Storage Unit Fire Control Procedure

A small fire in this area can be assessed by Facility personnel, and if deemed safe to handle, may be extinguished using an ABC-rated fire extinguisher present in this area. Should the automated suppression system activate, personnel shall leave the area and allow the system to extinguish the fire.

The Storage rooms in the warehouse are protected by a fire suppression system. The extinguishing medium is water supplied through the City of Albuquerque. The system is maintained under pressure (approximately 87 pounds per square inch (psi) and consists of 12 sprinkler heads with a discharge capacity of 350 gallons per minute (GPM). If the suppression system activates, the

Albuquerque Fire Department shall be notified by Facility personnel, who shall evacuate the area and await the Department's arrival. Upon arrival, the Fire Department Incident Commander will become the Site Incident Commander. Site personnel will provide details on inventory and site information to assist the Fire Department.

D.4.1.3 Response to Fuel Blending Tank Fire

The fuel blending tanks are mobile aboveground tanks. Examples of potential fire response procedures that may be required are described below.

1. Isolate the hazard area and deny entry to unauthorized personnel.
2. Stay upwind, keep out of low areas.
3. Ventilate closed space before entering (if this can be done safely)
4. Wear personal protective clothing.
5. Evacuate an adequately protective radius (if required).

Wastes that may be involved with the fire can be identified by the following methods:

a. Location of the container in the storage unit
b. Label on the container (if safe to observe).
c. Records of wastes stored onsite in the administrative office area.

If possible, emergency response personnel shall take measures necessary to collect and contain potentially hazardous run-off of fire suppression material (i.e. water, foam) and the contents of container/s involved. This may require construction of temporary berms or use of absorbent materials to prevent migration to storm drains or sewers.

D.4.1.4 Explosion

The following steps shall be implemented as needed in the event of an emergency involving an imminent or existing explosion that could threaten human health or the environment:

1. Personnel shall immediately evacuate the area.
2. The EC (or personnel) shall immediately notify the Albuquerque Fire Department by dialing the EOC at 911. Medical response can also be requested at the same time.
3. The EC shall take actions as directed by the Incident Commander (IC). Unless directed otherwise, the EC shall remain near the Facility, but at a safe distance, so that he or she can advise the response personnel of the hazards involved and the degree and location of the explosion and any fires.
4. Upon arrival at the site, the Albuquerque Fire Department officer-in-charge will assume command of firefighting. The EC shall advise and assist the Albuquerque Fire Department, but the officer-in-charge retains the responsibility of selecting the fire-fighting methods and tactics.
5. The IC shall be in overall control of Facility emergency response efforts until the emergency is terminated.
6. Wastes may be stabilized or neutralized, as appropriate; pouring an absorbent over the waste; and sweeping or shoveling the absorbed waste into drums or appropriate containers.

7. Surfaces affected by released hazardous wastes shall be cleaned using cleaners appropriate to the wastes involved.
8. If possible and safe, personnel shall take measures to contain potentially hazardous runoff and prevent it from entering storm drains, sewers, ditches, or drop inlets (for example, by building dikes around storm drains).
9. Any potentially contaminated waters collected in storm water catchment and retention ponds and floor trenches shall be analyzed to determine the appropriate treatment and disposal method, as applicable.
10. The EC shall secure all equipment (e.g., process equipment, ventilation equipment) that may be affected by the explosion and any fire once entry has been determined to be safe by the IC or a safety officer.

D.4.1.5 Response to Uncontrolled Releases

The following steps shall be implemented by the EC and Facility personnel in the event of an emergency involving an imminent or existing release of hazardous waste or hazardous waste constituents that could threaten human health or the environment:

1. Evacuate the immediate area.
2. The EC (or Unit personnel) shall immediately notify the Albuquerque Fire Department by dialing the EOC at 911. Medical response can also be requested at the same time.
3. Take actions to minimize, contain, and clean up the release only if it is safe.
4. Review Facility records (e.g., waste inventory database) to determine the identity and chemical nature of the released material or waste.
5. Wear appropriate personal protective equipment for exposure to the material or waste.
6. If possible, secure the source of the release.
7. If necessary and possible, build a dike to contain runoff.
8. Take measures to contain potentially hazardous runoff and keep it away from storm drains or sewers and if possible, build dikes around the storm drains.
9. Released wastes shall be collected and contained by stabilizing or neutralizing the spilled waste, as appropriate; pouring an absorbent over the spilled waste; and sweeping or shoveling the absorbed waste into drums or other appropriate containers.
10. No waste that may be incompatible with a released waste shall be treated, stored, or disposed of in the vicinity of the release location until the released waste is cleaned up or stabilized.
11. After collection of a released waste, the release site shall be sampled and evaluated. If contamination is present, the contaminated media shall be characterized and remediated to achieve clean closure as defined in Permit Part 5. The Permittee may choose to implement an alternative decontamination method for contaminated media such as surface cleaning or in-situ neutralization or stabilization. Any such alternative shall be approved by the NMED prior to implementation. If the contaminated media cannot be remediated to achieve clean closure, the contaminated media shall be subject to corrective action as required under Permit Part 7.

D.4.1.6 Minor Spills

A minor spill (as referenced in this Contingency Plan) is a spill that occurs within the secondary containment and does not involve a release of material to the environment. This type of spill involves spills and leaks from containers (typically 5-gallon through 250-gallon containers). A minor spill does not necessarily require implementation of this Contingency Plan.

D.4.1.7 Major Spills

Any spill which cannot be completely remediated is considered to be a major spill. Examples of a major spill include: a failure of secondary containment, vehicular accident, tank overfilling, equipment failure, or a fire. Spilled material which escapes containment can contaminate soil, surface water, groundwater, and/or sanitary sewer systems. ACT's Emergency response protocol for this type of spill must be as follows:

a. Assist any injured people and call for medical assistance as necessary.

b. Stop the flow of material, if possible.

c. Retain, contain, or slow the flow of the material if it cannot be stopped.

d. If hazardous waste escapes containment efforts, immediately call the local Fire Department.

e. Immediately recover the spilled waste to reduce property and environmental damage. Start recovery operations immediately.

The incident shall be reported to the National Response Center (telephone: 800/424-8802) and NMED (telephone: 505/827-9329 24-hour number), and the New Mexico Department of Public Safety (telephone (505) 827-9282.

The person reporting a spill must be prepared to give:

1. Their name, position.
2. The Company name, address, and telephone number.
3. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, the containment status and specify any equipment needed.
4. The extent of injuries (if any).

Equipment used to respond to spills must be cleaned and decontaminated with a detergent/water solution. All incidents will be documented and kept on file as part of the operating record and reviewed with branch personnel to prevent similar spills from occurring in the future.

All rinsates, waste residues, and decontamination fluids from the cleanup of spills or releases (whether major or minor), shall be containerized and managed as hazardous waste unless analytical results verify the wastes are not hazardous. Wastes resulting from spill cleanups shall be disposed of in accordance with applicable regulations.

D.4.1.8 Response to Release from Fuel Blending Tanks

The tanks at this Facility are mobile aboveground fuel blending tanks. The following actions will be taken upon discovery of a release:

- All transfers into the tank will be stopped immediately.
- As soon as practicable, remove as much of the material in the tank as practicable to prevent further releases of the material to the environment. This will typically be accomplished by transferring material into containers or pumping into a tanker.
- Containment of released material shall begin as soon as practicable.
- Report the release to the NMED Hazardous Waste Bureau in accordance with the applicable parts of Permit Section1.9.5.
- Implement Emergency Interim Measures, if necessary, in accordance with Permit Section 7.8.3.
- Initiate corrective action as necessary in accordance with Permit Part 7.
- If investigation indicates a major repair is needed to the tank system, implement the repairs and obtain certification by a qualified Professional Engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. Records of the repairs and the certification shall be placed in the Operating Record and maintained until closure of the facility.
-

D.4.1.9 List of Emergency Equipment

The list of Emergency Equipment available at the Facility is provided below in Table D-3.

D.5. FACILITY EVACUATION PLAN

During an emergency that threatens the health or safety of personnel within a Permitted Unit, the following steps shall be taken to facilitate safe coordinated evacuation:

a. Stop work.
b. If safe, close containers and shut down equipment or otherwise place it in a safe mode.
c. Alert personnel in the affected area by announcing the evacuation by voice command, "Evacuate the area."
d. Notify the City of Albuquerque Fire Department at the time of evacuation either from a safe on-site building, from a neighboring facility, or using a cellular phone.
e. Activate the internal communications and automatic alarm systems at the facility.
f. Check whether the evacuation route is safe.
g. If there is no evidence of danger or obstacles, exit the Facility according to the evacuation routes.
h. If there is evidence of danger or obstacles, exit the Facility by any safe route available.
i. If safe, check for other personnel in other areas.
j. Proceed to the designated assembly area for roll call to be taken by the EC.
k. If the EC and personnel are assembling at an alternate location, proceed to that location.

l. Inform the EC about any people that may still be inside the Treatment and Storage Areas.

Exits shall be clearly marked in the warehouses and office areas. Employees shall be trained to be aware of all potential escape routes. The Facility evacuation routes are shown on Figure 9, Permit Attachment M (Figures).

D.6 POST EMERGENCY ACTIONS

Immediately after an emergency, the Emergency Coordinator must ensure that the following activities are not conducted in the affected area(s) of the Facility:

a. Continue to monitor for leaks, pressure buildup, gas generation, and ruptures in valves, pipes, or other equipment as appropriate until normal operations are resumed;
b. Provide for proper treatment, storage, or disposal of recovered material or waste, contaminated soil or surface water, or any other media or material;
c. Ensure that no waste that may be incompatible with the released material or waste is transferred to, treated at, or stored in the vicinity of the release location until normal operations are resumed; and
d. Ensure that all equipment that is listed in Table D.3 is fit for its intended use.
e. Do not re-enter the Permitted Unit until the Incident Commander determines that it is safe to do so.

D.7 REPORTING

The Permittee shall notify all appropriate state and local authorities that the Facility is in compliance before operations are resumed in the affected area(s) of the Facility.

The Emergency Coordinator must document the time, date, and details of any incident that requires the implementation of the Contingency Plan. Within 15 days after the incident, the Permittee shall submit a written report on the incident to the New Mexico Environment Department in accordance with Permit Part 1, Section 1.10.5. At a minimum, the report shall contain the following:

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.
g. Estimated quantity and disposition of recovered material that results from the incident.

TABLE D.3
List of Facility Emergency Response Equipment at the ACT Facility.
The locations of the equipment are shown in Figure 6 in Permit Attachment M (Figures).

DESCRIPTION	LOCATION	QUANTITY	CAPABILITIES
Dry Chemical Fire Extinguishers-Hand held (type ABC)	Office area, warehouse, storage shed, return and fill shed. See Figure 6, Permit Attachment M.	12	Able to extinguish type A, B, and C fires
Fire Suppression Ansul automatic dry chemical System	Coverage throughout the Storage Building Warehouse	1	Able to contain and/or extinguish fire when activated.
First Aid Kits	Office/warehouse area. See Figure 6, Attachment M (Figures).	2	Provides items used to give basic medical attention.
Eye wash stations	Warehouse area	3	Provide a means of rinsing possibly harmful substances from the eyes and skin.
Showers	Office area, warehouse area	2	Decontaminate plant personnel in the event of a spill or release of hazardous waste or material.
Telephones/paging system	Office/warehouse area	8	Alert personnel of an on-site emergency or spill incident, evacuation orders and general in-plant communications.
Alert horn/strobe light	Fuel Blending Tank	1	Sounds and flashes when tanks are at 95% capacity.
Spill Control Kits, Absorbents, Recovery Drums and Containers	Fuel Blending Tank Area, Warehouse	3	Able to contain and absorb spilled liquids.

PERMIT ATTACHMENT E INSPECTION PLAN

E.1 INTRODUCTION

E.2 INSPECTION LOGS FOR THE FACILITY

The inspection schedules/logs described in this section and indicated on Tables E-1 through E-3 shall be followed for the inspection of the Units noted in Section E.2.1through E.3.4 of this Permit Attachment. If a power outage occurs during operation of the facility all activities related to the operation of the facility must cease until power is returned.

E.2.1 Daily Inspection

During each day that hazardous wastes containers are handled (e.g., containers are opened or moved) at the facility the Permittee shall inspect:

a. The loading/unloading areas that are used, including waste handling equipment, and the containers loaded/unloaded.
b. Treatment areas that are used, including treatment equipment.
c. Security devices, including the perimeter fence, gates and doors, warning signs, locks, and tamper indication devices.

E.2.2 Weekly Inspection

During each week that hazardous waste management (including storage) occurs at the facility the Permittee shall at least inspect once weekly: the container storage areas, containers in which hazardous waste is stored, including container placement, integrity, sealing, labeling, dates of storage, condition of storage area (i.e., floors, walls), secondary containment (where liquid waste is stored), waste compatibility and container compatibility storage conditions.

E.2.3 Monthly Inspection

During each month that hazardous waste management occurs at the Facility, the Permittee shall at least once inspect monthly:

a. The Safety & Emergency Equipment, including spill control equipment, fire extinguishers, decontamination equipment, external communication systems, internal communication and alarm systems, and fire suppression systems.
b. Unit operation and structural equipment, including the floors, walls, ceilings.
c. Treatment areas, including floors, walls, treatment equipment and tools.
d. Supply of protective glasses and hard hats both for employees and visitors.
e. Adequate number of sets of respirators (functional) and PPE for employees.

E.3 INSPECTION PLAN FOR THE HAZARDOUS WASTE TREATMENT AND STORAGE FACILITY

E.3.1 Daily Inspection Schedule:

During the daily inspection of items and areas listed in Table E-1, the inspecting personnel must note any repairs that are needed and ensure that they are completed promptly. Completion of any repairs shall also be documented in the Facility Operation Record.

TABLE E-1: DAILY INSPECTION SCHEDULE

Area / Item to be Inspected Daily	Criteria	Comments
SAFETY, SECURITY, AND EMERGENCY EQUIPMENT		
Fence / Gate / Signage	Make sure gates close properly and locks are in working order, the fence is intact and in good condition, warning signs are present and not faded. Does any part of the fence or gate require maintenance; Are the warning signs legible, and are they bilingual in English & Spanish?	
Emergency Eyewash / Showers, First Aid Kits	Make sure the items inspected are present, accessible, and functioning; and access to Eyewash and showers is not blocked.	
Fire Extinguishers / Suppression	Are fire extinguishers present, adequately charged, properly hanged, and tagged? Does the Suppression system have adequate pressure?	
Emergency Exits	Are emergency exits accessible and clear?	
Spill Clean Up Equipment	Is spill cleanup equipment stocked and accessible?	
TANK SYSTEM		
Tanker Truck Volume	Sudden deviations in the solvent volume will be investigated and their causes determined	
High Level Alarm	Test for oral and visual alarming	
Interstitial Monitoring System	Evidence of liquid in containment space indicating leak	
CONTAINERS, LOADING DOCK, AND FUEL BLENDING AREA		
Volume in Storage Area	Volume cannot exceed permitted storage capacity, Is the warehouse free of trash and debris?	
Containers in Storage Area	Check for evidence of leaks/spilled material on concrete floor and drains, bulging or corrosion of containers? proper closure, required labeling, is there adequate aisle space? Are containers properly stored in racking and on pallets?	
Secondary Containment	Inspect for evidence of spills, cracks or gaps, deterioration	
Loading/Unloading and Fuel Blending Area	Check that no containers of hazardous waste are left open or exposed overnight. Check for evidence of spilled material on concrete below the truck and on dock. Check for debris and refuse. Are tanker truck containers and ancillary equipment in good condition and not leaking?	

Table E-2 below presents the detailed items the Facility personnel shall inspect for, during the weekly inspections:

TABLE E-2:

WEEKLY INSPECTION SCHEDULE

Area/Equipment	Specific Item	Criteria	Comments
Safety and Emergency Equipment	Standard industrial absorbents	Is there insufficient quantity? Make sure they are not saturated with water	
	Spare containers and salvage drums	Check for evidence of corrosion, structural damage, inadequate number, check for labeling	
	Shovels	Are they damaged, missing?	
	Emergency shower and eye wash	Check for water pressure, leakage, and the drainage	
	Face shields, eyeglasses	Check for broken or dirty equipment, face shields, etc.	
	Protective clothing (impermeable full-body coveralls, foot coverings)	Are they damaged, missing?	
	Panic Doors	Are they easily opened?	
Security Devices	Perimeter fence	Check for corrosion, damage	
	Warning Signs on Perimeter fence	Make sure they are legible, not missing	
	Storage building doors	Ensure locks not missing	
	Main Gate	Ensure locking mechanism is not jammed	
	Emergency Lighting and all indoor and outdoor lighting	Replace burned out, expired lamps and batteries; also check the light switches	
	Alarms	Are they operable?	
Operating and Structural Equipment, both Outdoors and Indoors	Dikes, berms Dikes, cell walls Bases or foundation	Check for cracks in dikes, deterioration, spalling, wet spots, Check for Cracks in walls, spalling, deterioration. Erosion; uneven settlement; cracks or spalling in concrete pads, base rings, and piers; wet spots.	
	Sumps and secondary containment	Check for erosion, uneven settlement, cracks and spalling in concrete, wet spots deterioration or grating	
	Floor Joints	Check for cracks, spalling, and deterioration.	
	Ramps	Check for erosion, uneven settlement, cracks and spalling in concrete	
	Roll up doors	Check for sticking	
	Drum racks	Corroded? Deteriorated? structural integrity, wet spots	
	Roofs	Check for leaks	
	Walls	Check for Cracks, coating deterioration	
Container Storage Areas	Container placement	Aisle space, insecure placement	
	Container stacking	Containers stacked more than two high	
	Sealing of containers	Open lids, leaks, free of gaps or holes?	
	Labeling of containers, Odor, Fumes, Loading/Unloading Areas, Debris, Pallets	Improper identification, incorrect documentation, identification missing, obscured or incomplete label. Check for broken pallets/wood, warping, nails missing?	
	Dumpster/Tanker Trucks	Check for evidence of failure, leakage, label.	
	Segregation of Incompatible Waste	In same cell, Transfer containers previously used, waste in wrong cell	
Storm Water Retention Ponds	Run-off/Run-on concerns	In good condition, adequate freeboard, outlet not obstructed, no evidence of release of hazardous waste	

The Permittees shall conduct monthly inspections of the items listed below in Table E-3.

TABLE E-3:
MONTHLY INSPECTION SCHEDULE

Area/Equipment	Specific Item	Criteria	Comments
Safety and Emergency Equipment	Telephones	Power failure or poor transmission, functional	
	Fire alarm system	Power failure	
	Fire extinguishers	Check Expiration date, check pressure gauge for full charge	
	Air Supplied respirators	Check to see if supplied air respirators are functional	
	Fire Hydrants	Pressure, Flow	
	Panic Doors	Easily open	
Accessibility of Safety Equipment/ Protective Gear	Emergency Wear boots, gloves, clothing, duct tape, hard hats	Enough supply available	
Container Loading/Unloading Area	Check Dock leveler	Check for proper adjustment, operation, and corrosion	
	Containers, drums	condition and availability of overpack and open head drums	

E.3.2 Tanker Truck Inspections

The tank system holding the used solvent shall be inspected each operating day. The inspections shall include checks of the high-level alarm, and the volume held in the tank. Sudden deviations in the solvent volume shall be investigated and their causes determined. If necessary, repairs shall be initiated immediately. The solvent shall not exceed 95% of the tank volume at any time.

A liquid sensing leak detector is located between the two walls (secondary containment) of the tanks and the recorder chart must be checked each operating day. Any leaks detected which may indicate a leak or damage to the secondary containment must be noted and repaired immediately.

E.3.3 Container Storage Units

The container storage units or areas shall be inspected each operating day for leaks to the containers, typically Mondays through Fridays (see Tables E-1 to E-3 above). The total volume of the hazardous waste held in the drum 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 drums must immediately be placed in a drum of adequate integrity. The drums must be properly labeled and marked in accordance with the U.S. Department of Transportation (DOT), EPA, and the New Mexico Hazardous Waste Management Regulations. The secondary containment systems must be inspected for deterioration or failure. If cracks or leaks are detected, repairs shall be initiated immediately.

E.3.4 Roll-off Dumpster

The dumpsters/roll-off container must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately, and excess sediment must be removed from the dumpster.

E.4 DOCUMENTATION OF INSPECTIONS

The results of Daily and Weekly inspections shall be kept in the Facility Operating Record. The documentation may be recorded and maintained electronically. Any electronic inspection records shall be produced in a paper or an electronic copy at the time of a request for records by NMED.

PERMIT ATTACHMENT F PERSONNEL TRAINING PLAN

F.1 INTRODUCTION

The purpose of training is to familiarize employees with environmental regulations, records, and emergency procedures so that they can perform their jobs in the safest and most efficient manner possible. This training program is designed to ensure that facility personnel can respond effectively to emergencies by familiarizing them with waste management emergency procedures, emergency equipment, and emergency systems. All employees shall receive basic training on Hazard Awareness and the Facility Contingency Plan (Permit Attachment D). The level of training an employee receives will be based on the employee's level of involvement in hazardous waste management.

Each employee shall be trained to operate and maintain the facility safely, and to understand the hazards unique to hazardous waste management. This section contains information on Facility personnel and trainers, job descriptions, training outlines and training record forms. All employees at the Advanced Chemical Treatment LLC facility shall have training that satisfies the requirements of 40 CFR § 264.16. An employee shall not work in an unsupervised position until he or she has received proper training as outlined in Table F-2 (Outline of RCRA Training at the Facility).

F.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

The Facility office shall provide a training program that shall be executed annually. The training program shall be directed by personnel trained in hazardous waste management procedures and shall include instruction on hazardous waste management for facility personnel that is in accordance with 40 CFR § 264.16(a). Job descriptions may change as business needs dictate. A list of employees, their job titles, training, and job functions shall be maintained in the Facility Operating Record.

F.2.1 Branch General Manager

The Branch General Manager (or designate) is ultimately responsible for the operations at the Facility. The sales representatives, administrator, and Material Handler report to the Branch Manager and he in turn must provide the training and materials necessary for the facility employees to execute their duties. With respect to environmental compliance, the Branch Manager must:

- keep the service center clean and orderly.
- execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems.
- know the potential hazards of the material and waste handled on site.
- identify potential spill and fire sources and be able to execute the contingency plan.
- inform all employees of their environmental responsibilities.

- act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office.
- maintain all environmental records (such as manifests, training records and spill reports) on file.

F.2.2 Corporate Compliance Department

ACT's Compliance Department shall have personnel on staff who shall provide guidance to divisional and regional personnel for training, permitting, and other compliance issues for service centers in any given geographic area of the country.

F.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training shall be accomplished using classroom, electronic (i.e., video, e-Learning), written, and on-the-job methods. ACT shall prepare a training program for employees and the Service Center personnel and shall provide documentation that the program has been executed. Table F-1 below is a summary of the training that Facility personnel must take and the frequency of refresher training courses:

TABLE F-1: FACILITY PERSONNEL THAT MUST TAKE RCRA TRAINING

Job Title	Prior to Starting Work	On the Job Training	Refresher Training: Annually	When Regulations or Procedures Change
Branch General Manager	X	X	X	X
Branch Administrator	X	X	X	X
Sales/Service Representatives	X	X	X	X
All Warehouse Employees	X	X	X	X

F.4 OUTLINE OF TRAINING PROGRAM

An employee shall be trained prior to starting work or as soon as they begin working (depending on their position) and shall take a refresher course annually thereafter. The environmental health and safety Department shall ensure that the Branch General Manager or their designate has received adequate training to be able to train all branch personnel. Table F-2 (Outline of Personnel Training at the Facility) contains an example outline of the training program, which demonstrates that facility personnel are trained in hazardous waste management procedures.

F.4.1 Training of New Branch Managers

New Branch General Managers shall be fully trained before they begin their new positions. This training shall occur on site, on-the-job, in off-site classroom training, electronic (i.e., video, e-Learning), written, and on-the-job methods. While being trained, a new Branch General Manager shall review all environmental records and learn the recordkeeping requirements. These records shall include manifests, personnel records, training records, facility inspection records, and spill reports.

The training shall consist of an introduction to environmental law and a review of the operating Permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan. Additional time shall be spent reviewing past environmental compliance at the Branch General Manager's facility. Environmental protection regulations unique to the State of New Mexico (e.g., the NM Hazardous Waste Act (HWA), NMSA 1978, 74-4-1 through 74-4-14) shall be discussed as well.

F.4.2 Training of New Branch Administrators

Branch administrators shall be trained in the proper record keeping procedures as soon as they begin working for ACT. Additional training shall be overseen by the Branch Manager and shall be done within six months of starting the job, if needed. It may include the items listed in the RCRA Training Plan Outline presented in Table F-2 (Outline of Personnel Training at the Facility), and include emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues.

F.4.3 Training of New Sales Representatives

New sales representatives shall be introduced to the operating Permit, which includes Waste Analysis Plan, Preparedness and Prevention Plan and the Contingency Plan. A representative also shall be trained as a designate for performing the facility inspection. Additional training shall be conducted in the form of classroom, electronic (i.e., video, e-Learning), written, and on-the-job methods. The representative shall become familiar with the Contingency Plan before he or she formally begins the new position. Training covering all the items listed in Table F-2 (Outline of Personnel Training at the Facility) shall be completed by newly hired employees within six months of starting work at the Facility.

F.4.4 Training of Newly Hired Hazardous Waste Management Personnel

All hazardous waste management personnel shall be trained to maintain the Facility and assist the other branch employees in their tasks. A material handler may also be trained as the designate for performing the daily inspection. Additional training may be provided in the form of videotape presentations, classroom, electronic (i.e., video, e-Learning), written, and on-the-job methods. The Contingency Plan shall be reviewed with the Branch Manager before the new hazardous waste management personnel formally begins his/her new position, and annually thereafter. The Material Handler must review the items listed in Table F-2 (Outline of Personnel Training at the Facility)within six months of hire.

F.4.5 Annual Training

Employees shall be trained on an annual basis using a program prepared and updated annually by Facility regional and/or corporate compliance offices and ACT's health and safety department. The annual training shall include updates on environmental regulations, an in-depth review of the Contingency Plan and a review of the Facility Inspection Plan.

Facility employees shall annually review the actions listed in Table F-2 (Outline of Personnel Training at the Facility). This review may be in the form of slide/tape, videotapes and/or classroom presentation, and a review and discussion of the operating treatment and storage facility permit. In addition, periodic memoranda on changes in environmental regulations shall be provided by the Facility's regional/corporate offices. The regulations shall be read and discussed by branch personnel.

F.5 TRAINING RECORDS

All employee regulatory training must be documented in the Facility Operating Record. Records of current employees shall be kept at the facility until closure. Some training documentation may be maintained electronically. Training records for employees shall be kept for 3 years after termination of their employment.

TABLE F-2: OUTLINE OF PERSONNEL TRAINING AT THE FACILITY

I. Introduction: Major plans to be discussed include the following items A through C:

A. RCRA Contingency Plan and Preparedness and Prevention Plan
B. Spill Plan Control and Countermeasures Plan
C. Storm Water Pollution Prevention Plan

II. Measures that the Facility shall take to avoid sounding the emergency alarm

a. ***Storage and release prevention measures***

i. Best Management Practices

1. Housekeeping
2. Keep the drum storage drum areas clean and clear
3. Pick up debris
4. Maintain adequate Aisle space
5. Ensure container security – lids kept on and secured
6. Waste shall not be stacked over 2 tiers high

ii. Preventative maintenance

1. Daily/weekly inspections
2. Keeping containers closed. Check container integrity at all times.
3. Have Spill Equipment available at all times
4. Fire extinguishers shall be maintained and inspected as per schedule
5. PPE shall be worn by Facility personnel as required
6. First aid kits
7. Eye wash

iii. Security

1. Keep unauthorized / untrained people out of the area
2. Use the facility sign-in log
3. Keep doors closed and locked
4. Enforce the above measures listed in items 1 through 3 under Section iii.

III. Measures that the Facility shall take if the above practices fail, and a spill occurs

A. Activation of the site Contingency Plan

i. Contact the Groups on Emergency response list.
ii. Implement Emergency Plan/Coordinators role
iii. Activate Response preparation.
iv. Conduct the following response actions.
    1. Emergency shut-off switches
    2. Major/minor spills
    3. Fires
    4. Earthquakes
    5. Evacuation procedures
v. Notification requirements

B. Transportation Contingency Plan

i. Emergency response list
ii. Response preparation
iii. Response actions
iv. Notification requirements

PERMIT ATTACHMENT G CLOSURE PLAN

G.1 INTRODUCTION

The Advanced Chemical Treatment LLC (the Facility, ACT) operates as a treatment and storage facility for hazardous waste. The hazardous waste management unit (HWMU) and ancillary waste management facilities must be closed in accordance with the closure requirements of 40 CFR §264.111 through §264.115 and the procedures described in this Permit Attachment (G).

When ACT decides to close the Facility, notices shall be sent to generators employing ACT's services to inform them of the pending discontinuation of receiving their hazardous waste and materials. NMED will be informed at least 60 days prior to the date that final closure activities are expected to begin. All hazardous waste shall be removed from the site within 90 days of receipt of the final volume of waste and the closure activities shall be completed within 180 days.

Closure of the facility shall be carried out in accordance with the steps outlined in this plan. Implementation of this plan is intended to minimize the need for further maintenance and control, minimize, or eliminate the post-closure escape of hazardous wastes, hazardous constituents, contaminated runoff, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere. The procedures to achieve these objectives, which shall meet the closure performance standard in 40 CFR § 264.111, are described below.

This closure plan identifies the steps necessary to conduct facility closure. Amendments to the closure plan shall be conducted in accordance with 40 CFR § 264.112(c)(2). Closure shall be implemented in accordance with the schedule included in Part 5 of this Permit.

The facility subject to closure comprises the following 7 structures, which are shown on Figure 6 (Facility Floor Plan and Storage Areas) in Permit Attachment M (Figures).

a. One 23,000 square feet warehouse and rooms, bathrooms, loading/unloading dock, a back dock, two rainwater containment areas, and six container storage areas (A, B, C, D, E, F) used for hazardous waste container and drum storage.
b. One Hazardous Waste Consolidation area on the West Dock.
c. Operations Dock.
d. One enclosed storage area used for flammable storage (Area F).
e. One building with administrative offices and RCRA specified warehousing.
f. One Fuel Blending location on the South end of the East Dock Parking Area.

The maximum quantity of waste to be blended varies depending on the waste type and waste inventory. The maximum quantities ACT is allowed to blend are as follows:

- Bulk liquids (tanker truck) – 5,500 gallons per day. Treatment of hazardous waste in the other containers shall not be done the same day as the tanker truck to avoid exceeding the daily maximum amount allowed for treatment, which is 5,500 gallons per day.
- Bulk liquids (non-tanker) – 330 gallons per Container per day.
- Bulk tote container (i.e., 275 gallons) per day.

- 55-gallon drums, not to exceed 5,500 gallons per day for treatment.

The fuel and waste consolidation area are built upon a concrete base and contains a sloped loading dock and a series of connected containment sumps in each bay, providing approximately 1,400 gallons of secondary containment shown on Figure 7 (Facility Secondary Containment), Permit Attachment L (Figures).
The operating capacity of Storage rooms A through F is specified in Permit Attachment J (Hazardous Waste Management Units), Table J-1.1 (Hazardous Waste Storage (S01) and Treatment (T04) Units at the Facility). It is anticipated that the Facility will be clean closed. The Permittees shall attain clean closure of the Facility by meeting the closure performance standards specified at Permit Part 5 (Closure Requirements for the Facility), Section 5.2.1 (Criteria for Clean Closure). Final closure of the Facility will be deemed complete when the New Mexico Environment Department (Department) approves the Closure Report, and the certification required under Permit Part 5, Section 5.10 (Closure Report and Certification), and Section G.6 of this Closure Plan.

G.2 CLOSURE PROCESS

The Permittee shall, in accordance with Permit Part 5, Section 5.3.1 (Notification of Closure), notify the Department in writing that they have initiated closure at the Facility.

The Permittee shall, in accordance with Permit Part 5, Section 5.3.2 (Time Allowed for Closure) and Table 5.1 (Closure Schedule), complete all Facility closure activities.

The Permittee shall, in accordance with Permit Part 5, Section 5.3.4 (Removal of Waste), remove all hazardous waste from the Facility no later than 90 days after initiating closure at the hazardous waste management areas of the facility, and shall also remove any solid waste that adversely interferes with closure activities. The inventories of waste will be transported by authorized transporters to an off-site permitted hazardous waste treatment or disposal facility, recycler, or reclaimer, in accordance with all applicable state and federal regulations.

The Permittee shall, in accordance with Permit Section 5.3.5 (Records Review and Structural Assessment), conduct a records review and structural assessment of the Facility to evaluate whether any spills or releases have occurred at the facility. In addition, a structural assessment will be performed to identify areas of release or potential lapses in integrity to the hazardous waste management facility structures or containment areas. These evaluations will be used to determine sampling locations to verify the presence or absence of releases. The Permittee shall submit the review and assessment to the NMED in the form of a written report in accordance with Section 5.3.5 of the Permit (Records Review and Structural Assessment).

The Permittee shall, in accordance with Part 5, Permit Section 5.3.6 (Decontamination and Removal of Structures and Equipment), decontaminate or remove all contaminated structures and equipment from the Facility.

The Permittee shall, in accordance with Permit Section 5.3.7 (Verification Sampling of Structures and Equipment) and Section G.2.1 (Decontamination), perform decontamination verification sampling of all structures and equipment at the Facility that were required to be decontaminated.

The Permittee shall, in accordance with Permit Section 5.3.8 (Verification Sampling of Structures and Equipment) and Section G.2.1 (Decontamination), sample soils and base materials (*e.g.*, gravel) associated with the Facility to quantify constituents of concern associated with any releases of hazardous wastes.

The Permittee shall ensure that soils and base materials at the Facility contaminated with constituents of concern that pose an unacceptable risk to human health (based on the closure criteria in Permit Section 5.2.1(Criteria for Clean Closure) or the environment as specified in Permit Section 5.3.8 (Sampling of Soil and Base Material) are removed from the Facility in accordance with Permit Part 5, Section 5.3.9 (Removal of Contaminated Soil or Base Materials). The complete removal shall be verified by the Permittee in accordance with Permit Section 5.3.9 (Removal of Contaminated Soil or Base Materials).

If the contaminated soil or other environmental media cannot be removed because it would be impracticable, the soil or other environmental media shall be subject to corrective action under Permit Part 7 (Corrective Action).

G.2.1 Decontamination

After the inventory of the hazardous waste has been removed, ACT will visually inspect the surfaces of hazardous waste management areas and other structures including the Loading Dock Parking Area, the Truck Loading docks, and the Operation Dock, the Fuel and Waste Consolidation Area (FWCA), the Rainwater and Runoff Containment Areas, and shall remove any visible residues using dry methods as appropriate. Dry methods include, but are not limited to shovels, brooms, brushes, etc. Residues will be characterized and transported offsite in accordance with applicable solid or hazardous waste management regulations. The FWCA is included in the same footprint as the Loading Dock Parking Area and south Loading Dock. The locations of these areas and the HWMUs are depicted on closure sample location Figure 8 in Permit Attachment M (Figures).

Since hazardous waste is not managed in the facility offices or bathrooms, the office and bathrooms will not be subject to the decontamination procedures described in this Closure Plan.

After dry decontamination, a visual surface assessment will be performed by a professional engineer registered in the State of New Mexico. The surface will be inspected for cracks, fissures, gaps, deterioration, and staining. The certifying engineer shall determine if temporary sealing of containment areas should occur before steam pressure washing to prevent any migration of hazardous waste residues and assist in locating additional boring and/or sampling locations.

After any necessary temporary sealing, the surfaces will be decontaminated using a high-pressure detergent wash with a second-stage water rinse. Alternatively, steam cleaning or other appropriate cleaning techniques like mops or sponges may also be used. Walls (ranging in height from 17 up to 20 feet) and doors will be decontaminated first, followed next by shelving, followed lastly by the containment system/floor (in other words, decontaminate from higher surfaces to lower surfaces). Wash water from the decontamination will be containerized in a vacuum truck and/or drums and managed as hazardous waste for offsite disposal. Other waste generated during the decontamination such as PPE, temporary berms, or other disposable equipment will also be

managed as hazardous waste and shipped offsite by an authorized transporter for disposal. A final rinse will occur after the first two rinses and will be considered the testing rinse. The volume of the testing rinse will be minimized to avoid dilution of the sample water. The volume of the testing rinse will not exceed 10% of the volume of the secondary containment.

G.3 SAMPLING AND ANALYSIS PLAN

This sampling and analysis plan identifies: 1) the constituents of concern at the Facility, 2) the locations where sampling shall occur, 3) the laboratory analytical methods that shall be employed to quantify analyte concentration in samples, and 4) the quality assurance procedures to be utilized during closure.

The constituents of concern at the Facility shall be determined in accordance with Permit Sections 5.3.5 (Records Review and Structural Assessment) and 5.5(1) (*The list of Constituents of Concern*). A preliminary list of groups of constituents is presented in Table G.1-1 of this Permit Attachment; the list shall be modified at the time of closure, if necessary, in accordance with Permit Section 5.3.5 (Records Review and Structural Assessment).

The Permittee shall collect wet-wipe and soil samples and perform sample quality assurance procedures in accordance with Permit Sections 5.3.10.1 (Wet-Wipe Samples), 5.3.10.2 (Soil Samples), and 5.3.10.3 (Quality Assurance).

The Permittee shall sample soils and base materials at the applicable locations identified at Permit Section 5.3.8 (Sampling of Soil and Base Material). Closure soil sample locations are identified on Figure 8 (Closure Sample Locations), Permit Attachment M (Figures). Because of the length of the two storm water catchment ponds, the Permittee shall also collect three samples at the specified depths at each of three locations within each pond, one sample from the east and one from the west ends and one sample from the middle of the pond.

The Permittee shall sample structures and equipment at the applicable locations identified in accordance with Permit Section 5.3.7 (Verification Sampling of Structures and Equipment).

The wet-wipe sampling locations to verify decontamination in the storage rooms A through F are described in Part 5, Section 5.3.7 (Verification Sampling of Structures and Equipment) .

Sampling locations may vary from those described in Section 5.3.7 (Verification Sampling of Structures and Equipment) of this Permit due to conditions at closure. Sampling locations may also change as a result of amendments to this closure plan, such as amendments required under Permit Part 5, Section 5.6 (Amendment to the Closure Plan).

G.3.1 Decontamination Verification

To confirm that decontamination is complete, the test rinse from each HWMU, the Fuel and Waste Consolidation/Loading Dock Parking Area, the Truck Loading Docks, and the Operation Dock will be sampled and analyzed. Additionally, as required by NMED, wipe tests will be conducted on concrete

surfaces within the Warehouse Areas. The closure sample locations are depicted on Figure 8, Permit Attachment M (Figures).

G.3.1.1 Rinsate Samples

A representative sample of the test rinsate from each area shall be collected following the procedures described in Section G.3.7.
The samples will be analyzed for:

- Total Metals using SW-846 Method 5010 with appropriate Series 7000 individual
- Metal Methods
- Volatile Organics using SW-846 Method 8260
- Semi-Volatile Organics using SW-846 Method 8270
- PCBs using SW-846 Method 8080A

The results will be evaluated by the certifying engineer to verify decontamination effectiveness or recommend appropriate future activities. Decontamination will be considered complete when the concentrations are below appropriate risk-based standards or screening levels.

G.3.1.2 Wipe Samples

After decontamination, wipe samples shall be collected from the concrete flooring, walls and doors of each warehouse /hazardous waste storage and treatment area, and the Fuel and Waste Consolidation Area as depicted on Figure 8, Permit Attachment M (Figures). The wipe samples shall be collected in accordance with ASTM Guide1728, or other method approved by NMED. The number of wipe samples shall be 1 sample per 400 square feet. Wipe samples shall be collected from low points within areas E and F as shown on Figure 8. Two wipe samples shall also be collected from the Sump at the Loading Dock. Sample locations may be adjusted to address any areas of staining observed. This would be described in an amended Closure Plan approved by NMED.

The wipe samples shall be analyzed for:

- Total Metals using EPA SW-846 Method 5010 and appropriate Series 7000 individual Metals Methods
- Volatile Organics using EPA SW-846 Method 8260
- Semi-Volatile Organics using EPA SW-846 Method 8270
- PCBs using EPA SW-846 Method 8080A

G.3.2 Soil Sampling

Soil samples will be collected at closure to verify the presence/absence of contamination beneath the facility and in the vicinity of the fuel and waste blending or consolidation area/Loading Dock Parking Area, the Truck Loading Docks, and the Operation Dock. Soil samples will also be collected from the locations north and south of the warehouse which houses Rooms A through G - the hazardous waste management areas. The potential locations of the soil samples are shown

on Figure 8, Permit Attachment M (Figures). The soil sampling locations may be adjusted should the structural assessment conducted by the certifying engineer indicate potential lapses of integrity.

The soil samples will be collected underneath concrete areas using a coring device to access the underlying native soil. Once the concrete core is removed from each soil sampling location, soil sampling equipment (e.g., a hand auger or similar sampling device) will be advanced to native soil beneath the concrete. Native soil will be placed into appropriate laboratory-supplied sample containers suitable for the intended analyses. Sample containers will be labeled and placed on ice in a sample cooler.

The samples will be analyzed for the following parameters:

- Total Metals using EPA SW-846 Method 5010 and appropriate Series 7000 individual Metals Methods
- Volatile Organics using EPA SW-846 Method 8260
- Semi-Volatile Organics using EPA SW-846 Method 8270
- PCBs using EPA SW-846 Method 8080A
- pH using SW-846 Method 9040C or 9041.

The results will be evaluated by the certifying engineer in the closure report to verify decontamination effectiveness or recommend appropriate future activities. If any hazardous constituents are detected at concentrations above NMED risk-based standards or screening levels, a workplan will be prepared to determine the extent of the contamination and possible remedial actions.

G.3.3 Retention Pond Sampling

The Facility is designed to allow no run-on from nearby streets or property. Run-off is limited because the property is sloped so that rainwater remains on the property. All the rainwater that enters the property is collected in two retention ponds known as the Rainwater and Run-off Containment Ponds. Both ponds are located on the southern part of the property. During closure activities, three sediment samples shall be collected from each pond, that includes two samples from the end of each pond and one sample from the center of each pond as shown on Figure 8 in Permit Attachment M, (Figures).

The sediment samples shall be analyzed for Toxicity Characteristic Leaching Procedure metals using SW-846 Method 1311 to determine the leachable concentrations of the 40 constituents listed in 40 CFR §261.24 – Table 1. The results will be used to determine whether the retention ponds have been contaminated with hazardous waste or hazardous constituents.

G.3.4 Background Soil Sampling

Background soil sample locations are shown on Figure 8 (Closure Sample Locations) in Permit Attachment M (Figures) The locations of background samples may be modified at closure in an amended closure plan approved by NMED Representative background samples will be taken from areas not affected by waste management activities.

The samples will be analyzed for the following parameters:

- Total Metals using EPA SW-846 Method 5010 and appropriate Series 7000 individual Metals Methods
- Volatile Organics using EPA SW-846 Method 8260
- Semi-Volatile Organics using EPA SW-846 Method 8270
- PCBs using EPA SW-846 Method 8080A
- pH using SW-846 Method 9040C or 9041.

The analytical results of the background samples will be evaluated by ACT and included in the closure report. If concentrations of the hazardous constituents are found to be present above residential risk-based levels or background levels, a workplan to determine the extent of the contamination and the proposal for remedial action will be developed and submitted to NMED for approval.

G.3.5 Soil Gas Survey

G.3.5.1 Vapor Intrusion Assessment

In order to establish whether a vapor intrusion pathway is complete within select building structures, a sub-slab soil gas investigation will be conducted. The vapor intrusion investigation will focus on storage areas C, D, E, and F. The total area of these four hazardous waste storage areas is approximately 25,000 square feet (sq. ft). Based on this square footage, 10 sub-slab samples will be collected. The exact location of the 10 sub-slab samples will be based on field decisions once onsite. Five sub-slab samples will be installed within areas C and, with five additional sub-slab samples collected from storage areas E and F. Details of the sub-slab implants and associated sampling are presented below. The soil gas survey samples will be analyzed for the analytes in Table L-1below on the next page.

Sub-Slab Implant Installation

The sub-slab implants will be installed using a battery-powered hammer drill equipped with a 0.75-inch diameter drill bit. The drill bit will be used to penetrate the entire concrete slab thickness. An “air stone” attached to nylon tubing will be used in the construction of the sub-slab implants. Clean quartz sand will be placed around the air stone, and the remaining borehole will be sealed with hydrated bentonite. It is essential that the entire thickness of the concrete slab be sealed with hydrated bentonite to ensure sample integrity and prevent any chemicals that may be sorbed into the concrete from affecting the sample results. After collecting the soil gas sample, the tubing will be removed from the borehole, and the concrete slab will be patched with concrete. A minimum equilibration time of 2 hours will be allowed after installation before sampling.

Slab Samples

The sub-slab samples will be collected from the installed implants no sooner than 2 hours after the implants are installed. Before collecting the sub-slab samples, a helium leak and a secondary leak (shut-in) test will be performed on the summa canisters and the associated sampling apparatus. The sub-slab samples will be collected in 400 ml batch-certified summa canisters with 200 ml/min

flow controllers. Two duplicate samples will be collected in addition to an equipment blank as part of the QA/QC procedures. The samples will be analyzed for the parameters in Table G-1.

Table G-1: Analyte List for Vapor Intrusion Assessment

Analyte	EPA Test Method
SVOCs	
Pyridine	8270
N-nitrosodimethylamine	8270
2-Picoline	8270
N-Nitrosomethylethylamine	8270
Methyl Methanesulfonate	8270
N-Nitrosodiethylamine	8270
Ethyl Methanesulfonate	8270
Phenol	8270
Aniline	8270
Bis(2-chloroethyl)ether	8270
2-Chlorophenol	8270
Decane	8270
1,3-Dichlorobenzene	8270
1,4-Dichlorobenzene	8270
1,2-Dichlorobenzene	8270
Benzylalcohol	8270
Bis(2-chloroisopropyl)ether	8270
2-Methylphenol	8270
3- &4-Methylphenols	8270
Acetophenone	8270
N-nitroso-di-n-propyla...	8270
o-Toluidine	8270
N-Nitrosopyrrolidine	8270
Hexachloroethane	8270
Nitrobenzene	8270
Isophorone	8270
2-Nitrophenol	8270
2,4-Dimethylphenol	8270
Bis(2-chloroethoxy)methane	8270
2,4-Dichlorophenol	8270
Benzoic Acid	8270
1,2,4-Trichlorobenzene	8270
Naphthalene	8270
2,6-Dichlorophenol	8270
4-Chloroaniline	8270
Hexachlorobutadiene	8270
Caprolactam	8270
N-Nitroso-di-n-butylamine	8270
4-Chloro-3-methylphenol	8270
Isosafrole	8270
2-Methylnaphthalene	8270
Hexachlorocyclopentadiene	8270
1,2,4,5-Tetrachlorobenzene	8270
2,4,6-Trichlorophenol	8270
2,4,5-Trichlorophenol	8270
Safrole	8270
2-Chloronaphthalene	8270
2-Nitroaniline	8270
Dimethylphthalate	8270
1,3-Dinitrobenzene	8270
Acenaphthylene	8270
2,6-Dinitrotoluene	8270
3-Nitroaniline	8270
Acenaphthene	8270
2,4-Dinitrophenol	8270
4-Nitrophenol	8270
Dibenzofuran	8270
2,4-Dinitrotoluene	8270
1-Naphthylamine	8270
2,3,4,6-Tetrachlorophenol	8270
2-Naphthylamine	8270
Diethylphthalate	8270
Fluorene	8270
4-Chlorophenyl phenylether	8270
Fluorene	8270
5-Nitro-o-toluidine	8270
4-Nitroaniline	8270
4,6-Dinitro-2-methylphenol	8270
N-Nitrosodiphenylamine	8270
Azobenzene	8270
Dialate	8270
1,3,5-Trinitrobenzene	8270
Phenacetin	8270
4-Bromophenyl-phenylether	8270
Hexachlorobenzene	8270
Atrazine	8270
Pentachlorophenol	8270
4-Aminobiphenyl	8270
Pentachloronitrobenzene	8270
Pronamide	8270
Octadecane	8270
Phenanthrene	8270
Anthracene	8270
Carbazole	8270
Pentachlorobenzene	8270
Di-n-butyl Phthalate	8270
methapyrilene	8270
Isodrin	8270
Fluoranthene	8270
Benzidine	8270
Caprolactam	8270
Pyrene	8270
p-Dimethylaminoazobenzene	8270
Chlorobenzilate	8270
3,3-Dimethylbenzidine	8270
Butylbenzyl Phthalate	8270
2-Acetylaminofluorene	8270
3,3-Dichlorobenzidine	8270
Bis(2-ethylhexyl)phthalate	8270
Benzo(a)anthracene	8270
Chrysene	8270
Di-n-octyl Phthalate	8270
7,12-Dimethylbenz(a)anthracene	8270
Benzo(b)fluoranthene	8270
Benzo(k)fluoranthene	8270
Hexachlorophene	8270
Benzo(a)pyrene	8270
3-Methylcholanthrene	8270
Indeno(1,2,3-cd)pyrene	8270
Dibenz(a,h)anthracene	8270
Benzo(g,h,i)perylene	8270

Analyte	EPA Test Method
VOCs	
1,1,1,2-Tetrachloroethane	8260
1,1,1-Trichloroethane	8260
1,1,2,2-Tetrachloroethane	8260
1,1,2-Trichloro-1,2,2-trifluoroethane	8260
1,1,2-Trichloroethane	8260
1,1-Dichloroethene	8260
1,1-Dichloroethene	8260
1,1-Dichloropropene	8260
1,2,3-Trichlorobenzene	8260
1,2,3-Trichloropropane	8260
1,2,4-Trichlorobenzene	8260
1,2,4-Trimethylbenzene	8260
1,2-Dibromo-3-Chloropropane	8260
1,2-Dichlorobenzene	8260
1,2-Dichloroethane	8260
1,2-Dichloropropane	8260
1,3,5-Trimethylbenzene	8260
1,3-Dichlorobenzene	8260
1,3-Dichloropropane	8260
1,3-Dichloropropene, Total	8260
1,4-Dichlorobenzene	8260
2,2-Dichloropropane	8260
2-Butanone (MEK)	8260
2-Chlorotoluene	8260
2-Hexanone	8260
3-Chloro-1-propene	8260
4-Chlorotoluene	8260
4-Isopropyltoluene	8260
4-Methyl-2-pentanone (MIBK)	8260
Acetone	8260
Acrylonitrile	8260
Benzene	8260
Bromobenzene	8260
Bromoform	8260
Bromomethane	8260
Carbon disulfide	8260
Carbon Tetrachloride	8260
Chlorobromomethane	8260
Chlorodibromomethane	8260
Chloroethane	8260
Chloroform	8260
Chloromethane	8260
Chlorobenzene	8260
cis-1,3-Dichloropropene	8260
Cyclohexane	8260
Dibromomethane	8260
Dichlorobromomethane	8260
Dichlorodifluoromethane	8260
Ethyl ether	8260
Ethyl methacrylate	8260
Ethylbenzene	8260
Ethylene Dibromide	8260
Hexachlorobutadiene	8260
Hexane	8260
Iodomethane	8260
Isopropylbenzene	8260
Methyl acetate	8260
Methyl tert-butyl ether	8260
Methylcyclohexane	8260
Methylene chloride	8260
m-Xylene & p-Xylene	8260
Naphthalene	8260
n-Butylbenzene	8260
n-Propylbenzene	8260
p-Xylene	8260
sec-Butylbenzene	8260
Styrene	8260
tert-Butylbenzene	8260
Tetrachloroethene	8260
Tetrahydrofuran	8260
Toluene	8260
Total BTEX	8260
trans-1,2-Dichloroethene	8260
trans-1,3-Dichloropropene	8260
trans-1,4-Dichloro-2-butene	8260
Trichloroethene	8260
Trichlorofluoromethane	8260
Trihalomethanes, Total	8260
Vinyl acetate	8260
Vinyl chloride	8260
Xylenes, Total	8260

Analyte	EPA Test Method
Soil Gas Survey Analysis VOCs	
1,1,1-Trichloroethane	TO-15
1,1,2,2-Tetrachloroethane	TO-15
1,1,2-Trichloro-1,2,2-trifluoroethane	TO-15
1,1,2-Trichloroethane	TO-15
1,1-Dichloroethene	TO-15
1,1-Dichloroethene	TO-15
1,1-Dichloropropene	TO-15
1,1-Difluoroethane	TO-15
1,2,3-Trichloropropane	TO-15
1,2,4-Trichlorobenzene	TO-15
1,2,4-Trimethylbenzene	TO-15
1,2-Dichlorobenzene	TO-15
1,2-Dichloroethane	TO-15
1,2-Dichloropropane	TO-15
1,3,5-Trimethylbenzene	TO-15
1,3-Butadiene	TO-15
1,3-Dichlorobenzene	TO-15
1,3-Dichloropropane	TO-15
1,4-Dichlorobenzene	TO-15
1,4-Dioxane	TO-15
2,2,4-Trimethylpentane	TO-15
2,2-Dichloropropane	TO-15
2-Butanone (MEK)	TO-15
2-Hexanone	TO-15
2-Propanol	TO-15
4-Ethyltoluene	TO-15
4-Methyl-2-pentanone (MIBK)	TO-15
Acetone	TO-15
Acrylonitrile	TO-15
Benzene	TO-15
Benzyl chloride	TO-15
Bromoform	TO-15
Bromomethane	TO-15
Carbon disulfide	TO-15
Carbon Tetrachloride	TO-15
Chlorobromomethane	TO-15
Chlorodibromomethane	TO-15
Chloroethane	TO-15
Chloroform	TO-15
Chloromethane	TO-15
Chlorobenzene	TO-15
cis-1,2-Dichloroethene	TO-15
cis-1,3-Dichloropropene	TO-15
Cyclohexane	TO-15
Dichlorobromomethane	TO-15
Dichlorodifluoromethane	TO-15
Dichlorotetrafluoroethane	TO-15
Ethylbenzene	TO-15
Ethylene Dibromide	TO-15
Hexachlorobutadiene	TO-15
Hexane	TO-15
Isopropylbenzene	TO-15
Methyl tert-butyl ether	TO-15
Methylene chloride	TO-15
m-Xylene & p-Xylene	TO-15
n-Heptane	TO-15
n-Propylbenzene	TO-15
o-Xylene	TO-15
Styrene	TO-15
Tetrachloroethene	TO-15
Tetrahydrofuran	TO-15
Toluene	TO-15
trans-1,2-Dichloroethene	TO-15
trans-1,3-Dichloropropene	TO-15
Trichloroethene	TO-15
Trichlorofluoromethane	TO-15
Vinyl acetate	TO-15
Vinyl chloride	TO-15

Analyte	EPA Test Method
PCBs	
PCB-1221	8082
PCB-1016	8082
PCB-1232	8082
PBC-1242	8082
PCB-1248	8082
PCB-1254	8082
PCB-1256	8082
PCB-1260	8082
PCB-1268	8082
Polychlorinated biphenyls, Total	8082
TCLP and Total Metals	
Antimony	1311/6010
Arsenic	1311/6010
Barium	1311/6010
Beryllium	1311/6010
Cadmium	1311/6010
Chromium	1311/6010
Lead	1311/6010
Mercury	7470/7473
Nickel	1311/6010
Selenium	1311/6010
Silver	1311/6010
Thallium	1311/6010
Tin	1311/6010
Vanadium	1311/6010
Zinc	1311/6010
pH	9040

Data Analysis

The results of the sub-slab samples will be evaluated using the EPA Vapor intrusion screening level calculator (VISL) utilizing the New Mexico specific total risk values of 10^{-5} for carcinogens and a Hazard Index (HI) of 1.0 for non-carcinogenic substances as cleanup goals (See Table L-1 in Permit Attachment L).

G.3.6 Loading Dock Soil Sampling

Soil samples shall be collected at closure in the vicinity of the loading docks to evaluate for the presence of contamination. The SAP shall be updated based on the records review and structural assessment to target areas where there is damage to the pavement or concrete or evidence (e.g., staining) or a record of a release. At a minimum, three samples shall be collected in front of each loading dock from the native soils directly underlying the subgrade beneath the concrete or pavement. The soil sampling shall be conducted in accordance with the methods and procedures included in Permit Section 7.10. The soil samples shall be submitted to a chemical analytical laboratory for analysis for all constituents historically managed at the Facility. If constituents are present above residential risk-based levels, a workplan must be developed, and submitted to NMED for review approval, to determine the extent of contamination and the appropriate remedial action. Samples will be handled in accordance with the methods described at Permit Section 8.2.

The Permittees shall utilize the laboratory analytical methods, the sample preservation criteria, and the sample holding times as specified in Table G.1-1, as the information in the table may be updated via a closure plan amendment. The Permittee shall abide with the requirements for chemical analyses at laboratories as specified at Permit Part 7.

The Permittee shall document field activities associated with closure as specified at Permit Part 7, Section 8.2.17.

Table G.1-1
Sampling Requirements[1]

Parameter	Laboratory Method(s)	Preservation	Holding Time
Metals (Total: Ag, As, Ba, Be, Cd, Cr, Hg, Ni, Pb, Sb, Se, and Tl)	6010/6020/ 7470/7471	None	6 months (except Hg, 28 days)
VOCs	8260	Headspace free, Cool to 4°C	14 days
SVOCs	8270	Cool to 4°C	14 days
Dioxin/Furan Congeners	8280, 8290	Place in dark and cool to 4°C	30 days
PCBs	8080/8082	Cool to 4°C	14 days
Herbicides	8150/8151	Cool to 4°C	14 days
Cyanide	9010/9012	Cool to 4°C	14 days

[1]Methods are EPA SW-846 Methods, as revised and updated.

G.3.7 Sample Collection, Handling, and Quality Control

Representative samples of clean and used decontamination wash water and used decontamination rinse water will be collected using appropriate equipment. Sample collection methods for structural surfaces and equipment will include grid sampling, chipping, coring, drilling or wipe tests, as appropriate. The Sampling locations are indicated on Figure 8, Permit Attachment M (Figures). Samples will be collected, stored, and preserved in accordance with established and applicable procedures (e.g., EPA, ASTM). The samples will be analyzed for the parameters listed in Sections G.3.1 through G.3.5.

In order to collect accurate and defensible data of high quality, ACT LLC or the certifying engineer will evaluate accuracy, precision, representativeness, and completeness of the data. Field and laboratory Quality Control samples will be analyzed and evaluated as discussed in Section G.3.7.2. This procedure for determining the quality and usability of analytical data will be summarized in a data validation report regarding the overall quality of the data and the resulting data qualifiers. Data validation information will be submitted to NMED in the final closure report.

G.3.7.1 Sample Documentation and Custody

In order to ensure the integrity of samples from the time of collection through the reporting of analytical results, sample collection, handling, and custody will be documented in writing. The primary elements in the documentation of samples will include assignment of unique sample identification numbers, use of sample labels, use of custody tape, and documentation on Analysis Request/Chain-of-Custody Forms.

Each sample will be assigned a unique identification number. Labels will be completed with waterproof ink prior to sample collection to minimize container handling. Sample labels will include the following information:

- Name of sampler.
- Date and time of sample collection.
- Sample identification number.
- Sample matrix and how collected (i.e., grab, composite).
- Sample Preservation method; and
- Analysis required.

G.3.7.2 Laboratory Analysis and Quality Control (QC)

The analytical laboratory will have a written quality assurance (QA) plan and standard operating procedures in place to ensure sample preparation and analysis are performed properly and that results are of the appropriate and documented quality to ensure that objectives are met. The laboratory will perform the following QC checks with each batch of samples:

- **Laboratory control sample (LCS)**: consists of a control matrix (e.g., deionized water)spiked with known concentrations of analytes representative of the target analytes. LCSs shall be prepared and analyzed for each analytical procedure performed. LCSs shall

be analyzed with each analytical batch containing environmental samples to determine accuracy of data. The laboratory shall also evaluate the precision of the data by analyzing twice either the environmental samples or the LCSs and calculating the relative percent difference between corresponding results.

- **Method blank samples**: Method blank samples shall be used to check for contamination in the laboratory during sample preparation and analysis. Method blank samples will be prepared and analyzed with each analytical batch.

  Trip blank samples: trip blank samples shall be used to check for contamination that may be introduced during shipping and field handling procedures. Trip blanks shall be provided by the laboratory and shall consist of analyte-free water that will travel with the sample collection bottles from the laboratory to the field and then back to the laboratory without being opened until analysis by the laboratory.

Quality Assurance and Quality Control (QA/QC) samples will be collected as follows:

- One duplicate shall be collected per 20 samples for analysis.
- Matrix Spike: An aliquot of sample shall be fortified with known concentrations of target analytes, the sample prepared and analyzed, and the results compared to the results of a split non-fortified sample to determine and document the bias of the matrix on the analytical method.
- Matrix Duplicate: Split duplicates of a sample will be fortified with identical concentrations of target analytes and analyzed. The results will be used to document the precision and bias of a method in the sample matrix.

G.3.7.3 Sample Preservation, Handling, and Shipment Preparation

Container, preservative and holding time for each analytical parameter will follow EPA guidelines or equivalent methods acceptable to NMED. Sample shipment will be made in accordance with the U.S. Department of Transportation and International Air Transport Association shipping requirements, as applicable. Prior to shipment, sample collection documentation will be verified, and any errors corrected.

G.3.7.4 Field Quality Control Sampling

Field quality control will be accomplished by preparing blank and duplicate samples. Blanks and duplicate samples will be utilized in assessing any contamination introduced during sample collection and handling to analyze precision, and to check performance of the contract laboratory. Equipment rinsate blanks will be collected at a frequency of one per day for each piece of non-disposable sampling equipment, if any reusable equipment is used, to determine if cross-contamination has occurred. One in every twenty clean and used wash water and used rinse water samples collected will be submitted in duplicate for analysis and determination of precision.

The field blanks and duplicates will be treated as separate samples and submitted blind to the contract laboratory.

G.3.7.5 Analysis Request/Chain-of-Custody Form

In order to document the integrity of samples from collection to analysis, sample possession will be recorded on an Analysis Request/Chain-of-Custody Form. A sample is in custody if one or more of the following criteria apply:

- It's in an authorized person's possession or view, or
- Secured to prevent tampering; and
- Secured in an area restricted to authorized personnel.

In addition to other information such as facility and laboratory contact information and any special instructions, the Analysis Request/Chain-of-Custody Form will include the same information as that on the sample(s) label(s), will be initiated at the point of sample collection and will be kept with the sample(s) during transfer to the laboratory. The Analysis Request/Chain-of-Custody procedures will follow EPA guidance or equivalent methods acceptable to NMED.

G.3.7.6 Sampling Equipment Decontamination Procedures

In order to minimize the potential for cross contamination between samples, disposable sampling equipment will be used to the extent possible. If reusable sampling equipment is employed, it will be decontaminated as described above for tools in Section G.2.1 of this Closure Plan prior to being reused.

G.3.7.7 Waste Management

Waste will be generated through implementation of the sampling procedures. The waste will primarily be miscellaneous solid, nonhazardous wastes such as gloves, sample container packaging, and label adhesive backing. All waste generated during closure activities shall be managed in accordance with Federal and State regulations.

G.3.7.8 Data Management, Evaluation, and Reporting

Initial data reduction and validation will be done by the laboratory contracted to analyze the samples. The laboratory will report the data in accordance with their internal QC requirements. Duplicate and spiked laboratory control samples will be analyzed by the laboratory for indicators of precision and accuracy, with results reported as relative percent difference and percent recovered, respectively. Acceptance criteria for accuracy and precision will be included in the analytical report from the laboratory.

Summary analytical and laboratory QC data will be transmitted to ACT LLC or the certifying engineer by the contract laboratory. The analytical report will be in electronic and hard copy formats. The laboratory will archive all raw data, notes, and bench sheets in a manner allowing retrieval upon request by ACT. These records will include instrument tuning and calibration records, batch QC sample data, sample tracking and control documentation, raw analytical sample data, and analytical results.

Records associated with sampling and analysis, including field documentation, chains of custody, laboratory analytical results, data validation reports, and technical data evaluations will be maintained at the facility. ACT will comply with the recordkeeping provisions of 40 CFR §264.74 concerning the availability, retention, and disposition of such records. Upon completion of all closure sampling activities and receipt of analytical report showing that results are below TCLP standards, a Closure Report signed and certified by a professional engineer registered in the State of New Mexico will be prepared and submitted to NMED.

G.4 AMENDMENT TO THIS CLOSURE PLAN

The Permittee shall submit permit modification requests to amend this Closure Plan, if needed, in accordance with Permit Part 5, Section 5.6.

G.5 WASTES GENERATED FROM CLOSURE ACTIVITIES

The Permittee shall ensure that waste (*e.g.*, demolition debris and contaminated soil) generated from closure of the Facility is managed in compliance with all applicable state, federal, and local requirements (*see* 40 CFR § 264.114).

G.6 CLOSURE REPORT AND CERTIFICATION

No later than 60 days after completing closure of the Facility, the Permittee shall in accordance with Permit Section 5.10 submit a closure report to the Department for review and approval.

PERMIT ATTACHMENT H POST-CLOSURE CARE PLAN

The Permittee must also prepare a post-closure care plan and submit the plan to the NMED within 90 days from the date that the Permittee or the Department determines that clean closure cannot be or has not been achieved at the Permitted Facility as required by as required at 40 CFR §270.28.

(RESERVED)

PERMIT ATTACHMENT I COMPLIANCE SCHEDULE

(RESERVED)

PERMIT ATTACHMENT J HAZARDOUS WASTE MANAGEMENT UNITS

J.1 ACTIVE PORTION OF THE FACILITY TREATMENT AND STORAGE AREAS

The active portion of the facility comprises those areas used for treatment and storage of hazardous waste. These units are listed below in Table J-1.1.

Table J-1.1 provides information on storage capacities of the ACT hazardous waste treatment and storage units, process codes of the waste types, and associated descriptions:

- **S01**-*Storage in Containers.*
- **T04**-*Treatment in Tanker Trucks*

TABLE J-1.1.
Hazardous Waste Storage ($S0_1$) and Treatment (T04) Units at the Facility

Unit Identifier	Storage/*Treatment* Capacity	General Information		Type of Unit
1. Hazardous Waste slated for Storage in Containers (Process Code $S0_1$)				
Room A	11,000 gallons	Accepts waste from off-site generators. Manages and stores hazardous waste in drums. **Area**: 846 sq. ft.		**Indoor**
Room B	11,000 gallons	Accepts waste from off-site generators. Manages and stores hazardous waste in drums. **Area:** 846 sq. ft.		**Indoor**
Room C	59,400 gallons	Accepts waste from off-site generators. Manages and stores hazardous waste in drums. **Area:** 4536 sq. ft.		**Indoor**
Room D	55,550 gallons	Manages and stores off-site generated hazardous waste in drums, including flammable solids. **Area:** 4489 sq. ft.		**Indoor**
Room E	71,500 gallons	The Facility accepts, manages, and stores off-site generated hazardous waste in drums. **Area:** 4982 sq. ft.		**Indoor**
Room F	70,950 gallons	Accepts, manages, and stores off-site generated hazardous waste in drums and other containers. **Area:** 4982 sq. ft.		**Indoor**
Totals for Rooms	**125,000 gallons**	**Total Area = 20,681 square feet**		**Indoors**
Roll-off Container	40 cubic yards	The roll-off container shall not store hazardous waste for more than 90 days.		
2. Hazardous Waste Slated for Treatment (T04) and Consolidated in Tanker Trucks and other containers at the Loading Dock Parking Area				
TANKER TRUCKS ACT LLC Accepts hazardous waste from off-site generators, manages and treats the hazardous waste in Tanker Trucks by Fuel Blending. ACT will transfer drums and totes, of like compatible materials, directly into a vacuum tanker trailer on a weekly basis which ensures that the permittee is under permitted storage limits.	**Maximum Quantities to be Treated:**	**Fuel Blending and Consolidation Frequency**	**Total Amount Treated Annually**	**Outdoors**
	1. Bulk liquids (*tanker track*) – 5,500 gallons per day.	Weekly	286,000 Gallons	
	2. Bulk liquids (*non-tanker*) 330 gallons per day.	Weekly	17,160 Gallons	
	3. Bulk tote containers (i.e., 275 gallons per day).	Weekly	14,300 Gallons	
	4. 55-gallon drums - not to exceed 5,500 gallons per day when tanker truck is not used the same day. Treating with tanker truck the same day will exceed the maximum amount allowed stated in Part A Application.	275 Gallons/Weekly	14,300 Gallons	
Total Amount of Fuel to be Blended Annually			**331,760 Gallons**	

PERMIT ATTACHMENT K SOLID WASTE MANAGEMENT UNITS (SWMUS) AND AREAS OF CONCERN (AOCS)

(RESERVED)

PERMIT ATTACHMENT L FINANCIAL ASSURANCE

L.1 INTRODUCTION

This Attachment contains the Advanced Chemical Treatment LLC (ACT) Closure Cost estimate for 2023, which has been reviewed and approved by New Mexico Environment Department (NMED, the Department). Therefore, the Permittee will be required to submit the final financial assurance documents for the approved amount for this Final Permit to NMED no later than 60 days after this Final Permit takes effect. These final financial assurance documents will be incorporated by reference and can be requested from NMED's Administrative Record. These documents include the *Performance Bond, Trust Agreement, Schedule A, Schedule B, Commercial Bank Statement*, and the *Certificate of Liability Insurance*. These documents demonstrate ACT's financial assurance. This information was submitted to the NMED by the Permittees, as required by 40 CFR Part 264, Subpart H (Financial Requirements), and 40 CFR § 270.14(b)(17).

L.1.1 Closure Cost Estimate and Adjustment Calculations

Table L-2 below contains details of the revised 2024 Closure Cost Estimate that the Department received from ACT in response to NMED's Second Notice of Disapproval dated August 21, 2025. The final amount of the closure cost estimate shall be the total amount reported to be spent on closure activities multiplied by the inflation factor in accordance with 40 CFR Part 264, Subpart H (Financial Requirements). The Permittee shall use the equations provided in Permit Part 5, Section 5.11.2, which are reproduced below, to calculate the inflation factor to adjust the closure cost estimate for the subsequent cost estimate submittal every year, as required by 40 CFR § 264.142(b)(1) and (b)(2).

The Permittee shall adjust the previous cost estimate using the inflation factor as follows:

$$\left(\frac{\text{IPD}_{\text{current year (or latest published)}}}{\text{IPD}_{\text{previous year}}}\right) \times \text{Cost Estimate Total}_{\text{previous year}}$$

$$= \text{Cost Estimate Total}_{\text{current year}}$$

Where IPD is the Implicit Price Deflator, and the following ratio:

$$\frac{\text{IPD}_{\text{current year (or latest published)}}}{\text{IPD}_{\text{previous year}}} = \text{the inflation factor.}$$

The implicit price deflators for gross national product (GNP) are published on the Bureau of Economic Analysis' (BEA) Table 1.1.9 (Implicit Price Deflators for Gross Domestic Product). (https://apps.bea.gov). The Permittee shall report which years the IPD values were recorded. The Permittee shall submit a pdf copy of BEA's Table 1.1.9 that also presents the date the table was accessed so that NMED can verify the calculations and the IPD values that the Permittee used to complete the inflation adjustment calculation.

TABLE L-1
Closure Cost Estimate

Activity	Quantity	Units		Total Cost 2024 Dollars
1. Removal & Disposal of Maximum Inventory				
Container Consolidation Crew (Assume 4 operators, 10 hours/day, for 4 days)	160	hour	$56	$8,960
Equipment Cost (Crew Truck, Mobilization, Demobilization)	40	hour	$55	$2,190
PPE - Tyvek (Assume 5 Tyvek per day per operator)	80	each	$16	$1,280
PPE - Gloves (Assume 3 pairs per day per operator)	48	pair	$3	$128
PPE - Respirator Cartridges (Assume 1 pair cartridges per operator per day during consolidation)	16	pair	$38	$611
Forklift Crew for 40 hours (Assume 4 operators, 10 hours/day, for 2 days)	80	hour	$56.00	$4,480
Forklift (Assume 2 forklifts for 2 days)	4	day	$281.00	$1,124
Project Manager for Consolidation/Loading	40	hour	$120.00	$4,800
Incineration - hazardous waste (Assume 29% of containers are lower hazard, consolidated to 55 gallon containers - 570 drums)*	36,250	gallons	$5.13	$185,963
Trans to Incin (Veolia, Beaumont, TX, ~919 miles)	3	load	$4,413.00	$13,239
Incineration - high hazard waste (Assume 1% of total volume are higher hazard (PIH, Reactive, etc.), shipped in 5 gallon drums - 250 drums, 16 drums per pallet)*	1,250	gallons	$53.00	$66,250
Trans to Incin (Clean Harbors, Aragonite, UT, ~656 miles)	2	load	$5,024.00	$10,048
Fuels Blending (70% of containers - 1591)*	87,500	gallons	$0.76	$66,500
Trans to Fuels Blending (Sapphire (Ash Grove Cement Co.), Chanute, KS, ~704 miles)	9	load	$3,728.50	$33,557
2. Building Decontamination				
Wash water/residue generated from closure activities (Assume 0.575 gallons/sq. ft. for wash and 0.2 gal./sq. ft. for each rinse; 51,270 sq. ft. total area)	49,988	gallons	$3.00	$149,965
Trans to treatment (Veolia, Beaumont, TX, ~919 miles; 5,000 gallons/shipment)	10	load	$4,413.00	$44,130
Pressure Washer Rental (assume 2 pressure washers, 4 days)	8	days	$390.00	$3,120
Project Manager for Decon/Demolition Activities	40	hours	$120.00	$4,800
Equipment Cost (Crew Truck, Mobilization, Demobilization)	64	hour	$55	$3,504
Decon Team (4x people, 4 days, 10 hours/day)	160	hours	$50.00	$8,000
PPE - Rain Suit	4	each	$90.00	$360
PPE - Gloves (Assume 3 pairs per day per operator)	48	pair	$2.67	$128
PPE - Respirator Cartridges (Assume 2 pair cartridges per operator per day during initial wash and rinse)	8	pair	$38.00	$304

Activity	Quantity	Units		Total Cost 2024 Dollars
3. Contaminated Media Demolition				
Demolition team (4-man crew, 10 hours/day, for 8 days)	320	hour	$50.00	$16,000
Equipment Cost (Crew Truck, Mobilization, Demobilization)	80	hour	$55	$4,380
Jackhammer rental (Assume 2 pieces of equipment utilized simultaneously)	2	week	$160.00	$320
Air reciprocating saw rental	2	week	$145.00	$290
Industrial Air Compressor rental (Assume 2 pneumatic tools can be operated on each compressor)	2	week	$2,600.00	$5,200
Project Manager for Media Demolition	40	hour	$120.00	$4,800
Contingency for disposal of contaminated walls	8	cubic yard	$490.00	$3,920
Contingency for disposal of contaminated concrete flooring or asphalt	8	cubic yard	$465.00	$3,720
3. Soil Remediation				
Contingency for excavation of contaminated soil (Assume 1 Operator, 8 hours/day for 5 days)	40	hour	$60.00	$2,400
Excavator Rental	1	week	$1,340.00	$1,340
Project Manager for Excavation, Soil Shipment, and Backfill activities	40	hour	$120.00	$4,800
Roll-off box rental (40 cu. yd.)	5	each	$1,000.00	$5,000
Waste transportation (Veolia, Beaumont, TX, ~919 miles)	5	load	$4,413.00	$22,065
Contingency for disposal of contaminated soil	185	cubic yard	$150.00	$27,778
Dump Truck Rental (Clean soil transportation)	1	week	$2,850.00	$2,850
Dump Truck Crew (Assume 1 Operator, 8 hours/day for 5 days)	40	hour	$60.00	$2,400
Sampling of imported soil	1	sample	$1,000.00	$1,000
Backfill with clean soil	185	cubic yard	$150.00	$27,778
Dozer crew for grading (Assume 1 Operator, 8 hours/day for 3 days)	16	hour	$60.00	$960
Dozer rental (Assume 3 days)	1	week	$1,995.00	$1,995
Equipment Cost (Crew Truck, Mobilization, Demobilization)	104	hour	$55	$5,694

Activity	Quantity	Units		Total Cost 2024 Dollars
4. Sampling Costs				
Contingent Equipment decontamination verification sampling (wash and rinse water - 16 samples, 1 duplicate, 6 trip blanks (one per cooler))	23	sample (aqueous)	$750.00	$17,250
Concrete decontamination verification sampling (wash and rinse water - 11 samples, 1 duplicate, 4 trip blanks (one per cooler))	16	sample (aqueous)	$750.00	$12,000
Contingency labor costs for equipment and concrete decontamination verification sampling (Assume 1 sampler, 30 minutes/sample, 32 samples)	16	hour	$100.00	$1,600
Concrete Coring Labor Costs (only if cracks are fully penetrating; assume 2 laboreres, 46 locations, 1 hour/location)	92	hour	$56.00	$5,152
Contingency Soil Sampling Analysis (only if cracks are fully penetrating) - RCRA Total Metals, VOC, SVOC, PCB, pH (Assume all 55 locations on the Figure I.1 have fully penetrating cracks and 3 duplicate samples are collected)	58	sample (solid)	$1,008.00	$58,464
Contingency labor costs for soil sampling (Assume 2 samplers, 30 minutes/sample, 58 samples - includes Rainwater and Runoff Containment Ponds)	58	hour	$100.00	$5,800
Contingency labor costs for soil analysis evaluation and reporting (Assume10 hours to prepare report (Senior Consulting Staff - $133/hr) and 2 hours to review and submit (Project Manager - $191/hr))	1	lump sum	$1,712.00	$1,712
Wipe Samples- RCRA Total Metals, VOC, SVOC, PCB (Assume 76 samples from the building, 13 from large equipment, 3 from small equipment, and 4 duplicates, and 2 blank samples)	98	sample	$995.00	$97,510
Contingency labor costs for wipe sampling - (Assume 1 sampler, 30 minutes/sample, 92 wipe samples)	47	hour	$100.00	$4,700
Project Manager for sampling activities	70	hour	$191.00	$13,370
Rainwater and Runoff Containment ponds analysis-RCRA Metals (TCLP), VOC, SVOC, PCB, pH	6	sample	$1,000.00	$6,000
Equipment Cost (Crew Truck, Mobilization, Demobilization)	137	hour	$55	$7,501
5. Soil Gas Survey				
Sub-slab Implant & Sample Collection (installation, leak test, collection & abandonment. Assume 2 operators, 4 hours/hole, 10 holes)	80	hour	$100.00	$8,000
Project Manager for Soil Gas Survey Activities	20	hour	$133.00	$2,660
TO-15 (Assume 10 samples, 2 duplicate samples, and 1 equipment blank)	13	each	$490.00	$6,370
Field supplies (Assume 2 drill bits, 2 drills, bentonite, 10 "airstones", quartz sand, tubing, concrete to patch holes during abandonment)	1	lump sum	$2,270.00	$2,270
Equipment Cost (Crew Truck, Mobilization, Demobilization)	40	hour	$55.00	$2,200
Risk Calculations (Assume10 hours to perform calculations and prepare report (Senior Consulting Staff - $133/hr) and 2 hours to review and submit (Project Manager - $191/hr))	1	lump sum	$1,712.00	$1,712

Activity	Quantity	Units		Total Cost 2024 Dollars
6. Closure Certification Costs				$0
Inspection by NM Registered P.E.	20	hours	$200.00	$4,000
Preparation of closure report by NM Registered P.E.	100	hours	$200.00	$20,000
7. Other Costs:				$0
Labor costs for sealing cracks, fissures, etc.	16	hour	$75.00	$1,200
Equipment rental (PPE, tack hammer, hand tools, etc.)	10	day	$500.00	$5,000
Generated decontamination, demolition, and sampling waste disposal (PPE, decontamination equipment and residues; concrete cores, miscellaneous soil)	550	gallons	$8.00	$4,400
Generated Waste Transportation (Veolia, Beaumont, TX, ~919 miles)	1	load	$4,413.00	$4,413
NMED Closure Report review fee (per 20.4.2.209 NMAC)	1	lump sum	$13,000.00	$13,000
Contingency to cover unexpected costs (assume 10% of total costs)	1	lump sum	$104,084.01	$104,084
		Subtotal		$ 1,040,840.06
		Total Closure Amount		**$ 1,144,924.06**

Note: The list of analytes for the Facility Closure Soil Gas Survey samples vapor intrusion assessment can be found in Permit Attachment G (Closure Plan), Table G-1, Section 3.5.1 - Vapor Intrusion Assessment.

Assumptions:
1) The facility is in compliance with the conditions of the permit at the time of closure.
2) Final closure work will be completed by independent contractors. No equipment from the facility will be used.
3) The processing building will be washed and disinfected, but not demolished. a. Assume Industrial pressure washer uses 7.5 gallons water per minute and produces 0.575 gallons water per square foot for initial wash and 0.2 gallons per square foot for the two rinses required by the closure plan b. The height of the walls vary from 17 feet high to 20 feet high, depending on the portion of the building. The total area of each wall was calculated and added to the area on the below table.
4) This closure cost estimate accounts for all materials on-site, including maximum inventories of processed and unprocessed waste.
5) Level C PPE will be utilized for container consolidation and building decontamination efforts; level D PPE will be utilized for all other efforts.
6) The total area of the Fuel and Waste Consolidation Area, including wall and doors is 1,155 square feet.
7) List of analytes and test methods included as attachment to Appendix H.2.
8) Assume that soil removal is equivalent to 10,000 square feet, six inches deep (5,000 cubic feet = 185 cubic yards)
9) 1 pallet (4 drums) can be moved every 4 minutes For 5-gallon containers, assume 16 containers per pallet
Note: Although the total design capacity of the facility is 284,900 gallons, the maximum permitted quantity to be managed at the Facility at any one time is limited to 125,000 gallons. The cost estimate takes into account that some containers will be less than 55 gallons and will be consolidated into at least 55 gallon containers prior to or during closure.
*Approximately 70% of material will be transported for fuels blending and approximately 30% will be transported for incineration. Transportation costs are based on 70% of the wastes going to the current fuel blender located in Chanute, KS and the remaining 30% being split between Beaumont, TX (29%), and Aragonite, UT (1%).
Sources: RS Means Data Online, Release Date 2023; current online costs; and third party estimates.

Area for Decontamination

*Area	Total Floor Area (sq. ft.)	Total Wall/Door Area (sq. ft.)	Total Area (sq. ft.)
A	846	2014.5	2860.5
B	846	2014.5	2860.5
C	4536	5128.5	9664.5
D	4489	5131.5	9620.5
E	4982	5520	10502
F	4982	5520	10502
Fuel and Waste Consolidation Area/ Loading Dock Parking	900	255	1155
Loading Dock	960	255	1215
Operations Dock	960	255	1215
Back Dock	1250	425	1675
Total Area (sq. ft.)			51270

L.1.2 Certificate of Liability Insurance

The liability insurance amounts indicated below, which demonstrates the liability coverage amount, was submitted to NMED in the Permittee's August 2022 updated Permit Renewal Application. The August 2022 *Certificate of Liability Insurance*, which can be found below currently meets the regulatory requirements specified at 40 CFR §264.147 (Liability Requirements).

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER ISU Massie & Beck Ins. Serv. License #0B29340 315 Lennon Lane Walnut Creek, CA 94598 Dean Sigmundson 925-283-5750	CONTACT NAME: Julie Rector PHONE (A/C, No, Ext): 925-283-5750 FAX (A/C, No): 925-283-5751 E-MAIL ADDRESS: julie@isumassie.com

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A: Starr Indemnity & Liability	38318
INSURER B: Starr Surplus Lines Ins. Comp.	13604
INSURER C: Hartford Fire Insurance Co.	19682
INSURER D:	
INSURER E:	
INSURER F:	

INSURED
Advanced Chemical Transport, Inc., DBA: ACTenviro, et al
967 Mabury Road
San Jose, CA 95133

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	X COMMERCIAL GENERAL LIABILITY						EACH OCCURRENCE	$ 1,000,000
	CLAIMS-MADE X OCCUR			1000066897221	04/18/2022	04/18/2023	DAMAGE TO RENTED PREMISES (Ea occurrence)	$ 50,000
B	X Prof. Liability			1000066898221	04/18/2022	04/18/2023	MED EXP (Any one person)	$ 5,000
A	X Contr.Poll.Liab.			1000066897221	04/18/2022	04/18/2023	PERSONAL & ADV INJURY	$ 1,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE	$ 2,000,000
	POLICY X PRO-JECT LOC						PRODUCTS - COMP/OP AGG	$ 2,000,000
	OTHER:							$
A	AUTOMOBILE LIABILITY						COMBINED SINGLE LIMIT (Ea accident)	$ 1,000,000
	X ANY AUTO			1000638118221	04/18/2022	04/18/2023	BODILY INJURY (Per person)	$
	OWNED AUTOS ONLY / SCHEDULED AUTOS						BODILY INJURY (Per accident)	$
	X HIRED AUTOS ONLY / X NON-OWNED AUTOS ONLY						PROPERTY DAMAGE (Per accident)	$
							Comp/Coll	$ $1K or $2K
A	UMBRELLA LIAB X OCCUR						EACH OCCURRENCE	$ 10,000,000
	X EXCESS LIAB CLAIMS-MADE			1000336473221	04/18/2022	04/18/2023	AGGREGATE	$ 10,000,000
	DED RETENTION $							$
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY Y/N						X PER STATUTE / OTH-ER	
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)	N/A		83WEOH7000	03/01/2022	03/01/2023	E.L. EACH ACCIDENT	$ 1,000,000
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - EA EMPLOYEE	$ 1,000,000
							E.L. DISEASE - POLICY LIMIT	$ 1,000,000
A	Excess Liability			1000336473221	04/18/2022	04/18/2023	Includes	Auto &Prof.
							Includes	WC/EL

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Evidence of insurance only.

CERTIFICATE HOLDER

ADVAN10

Advanced Chemical Treatment, Inc.
6137 Edith Blvd NE
Albuquerque, NM 87107

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Dean Sigmundson

PERMIT ATTACHMENT M FIGURES

M.1 FIGURES

The following are the 9 Figures referenced elsewhere in Permit Parts 1 through 7, and in Permit Attachments A through L:

Figure 1: Facility's General Location Map

Figure 2: Wind Rose Map for Albuquerque

Figure 3: Topographic Map

Figure 4: Flood Plain Map

Figure 5: Land Use Map around the Facility

Figure 6: Facility Floor Plan and Storage Areas

Figure 7: Facility Secondary Containment

Figure 8: Closure Sample Locations

Figure 9: Facility Evacuation Routes

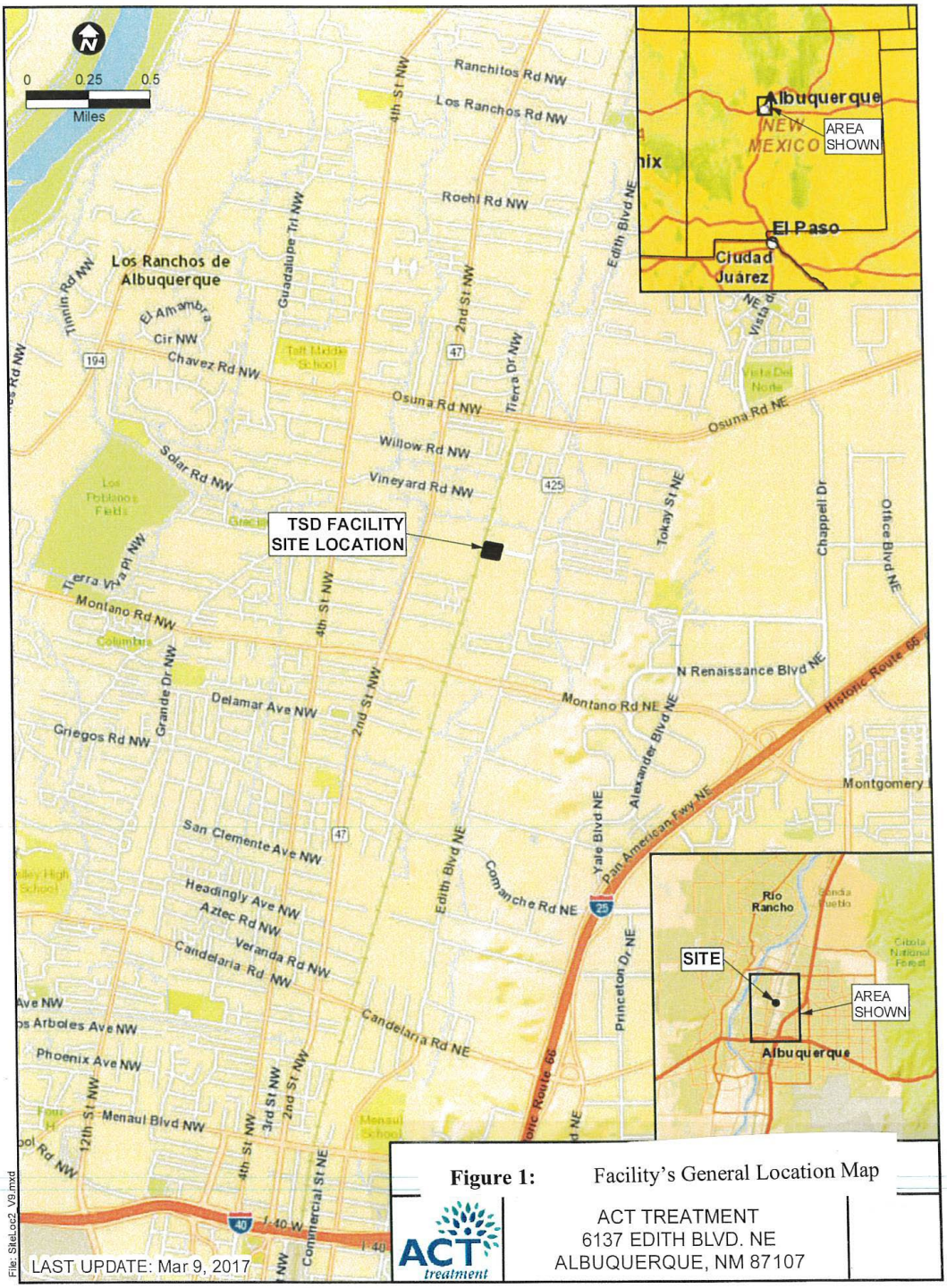


Figure 1: Facility's General Location Map

ACT TREATMENT
6137 EDITH BLVD. NE
ALBUQUERQUE, NM 87107

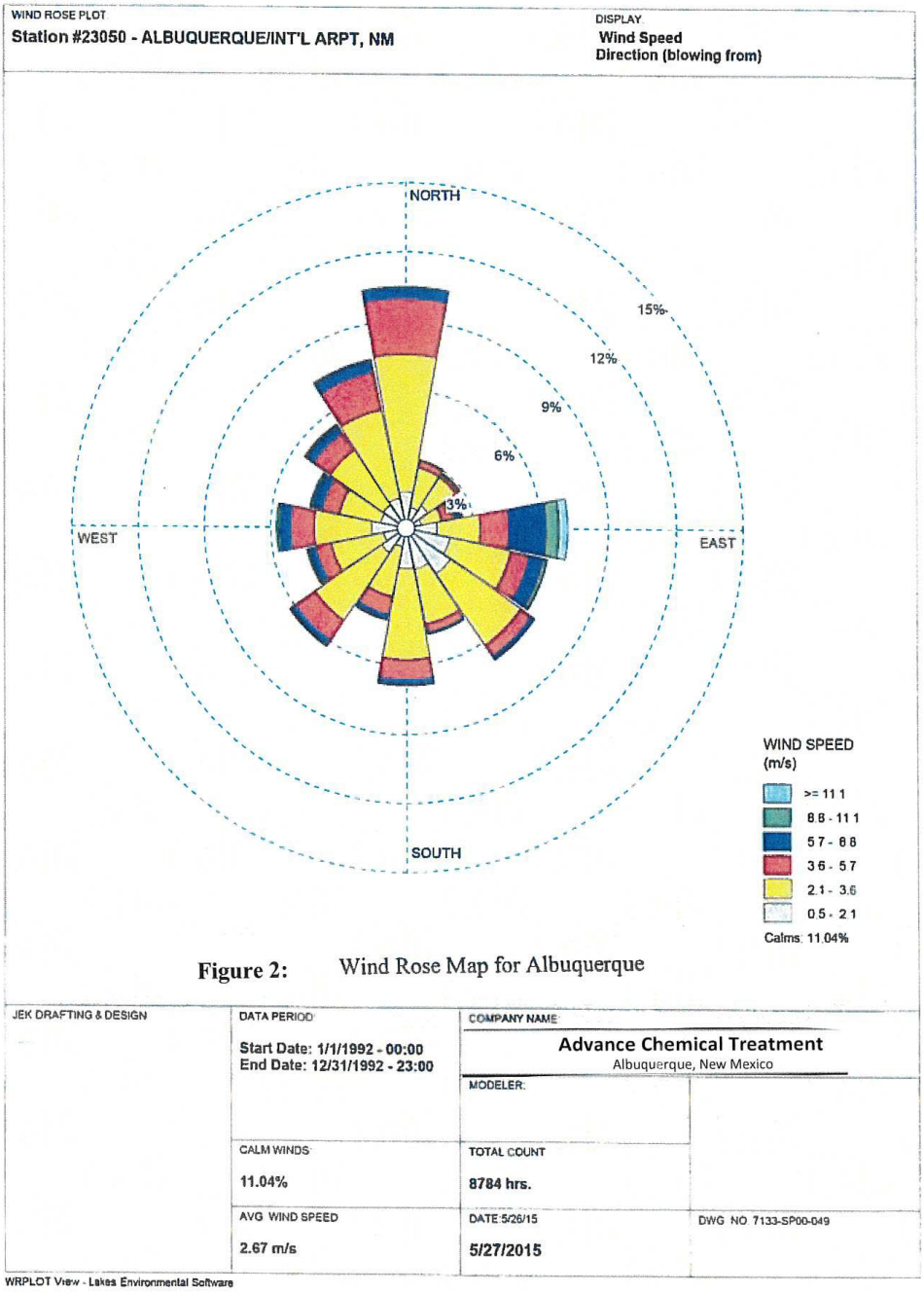
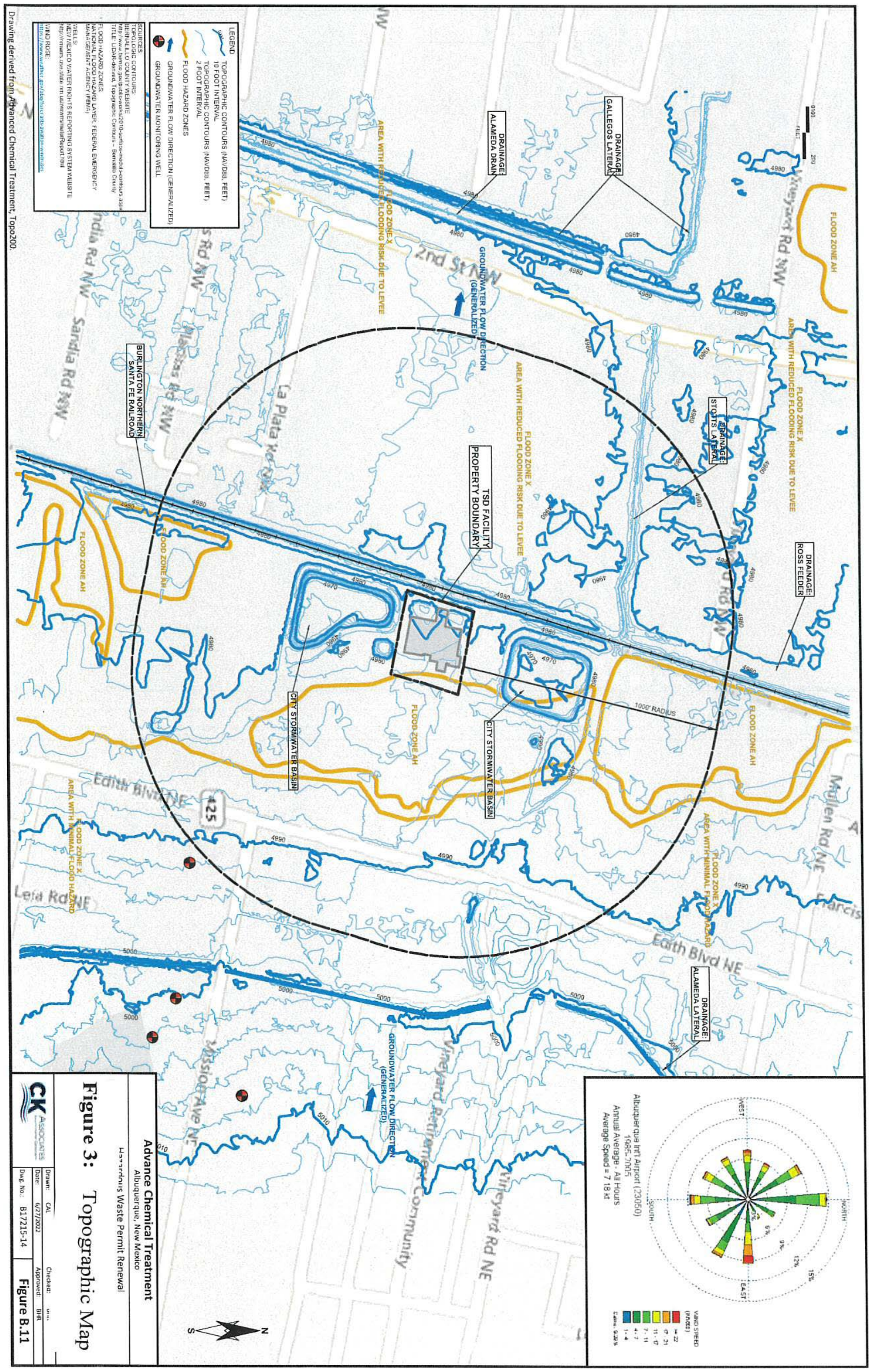
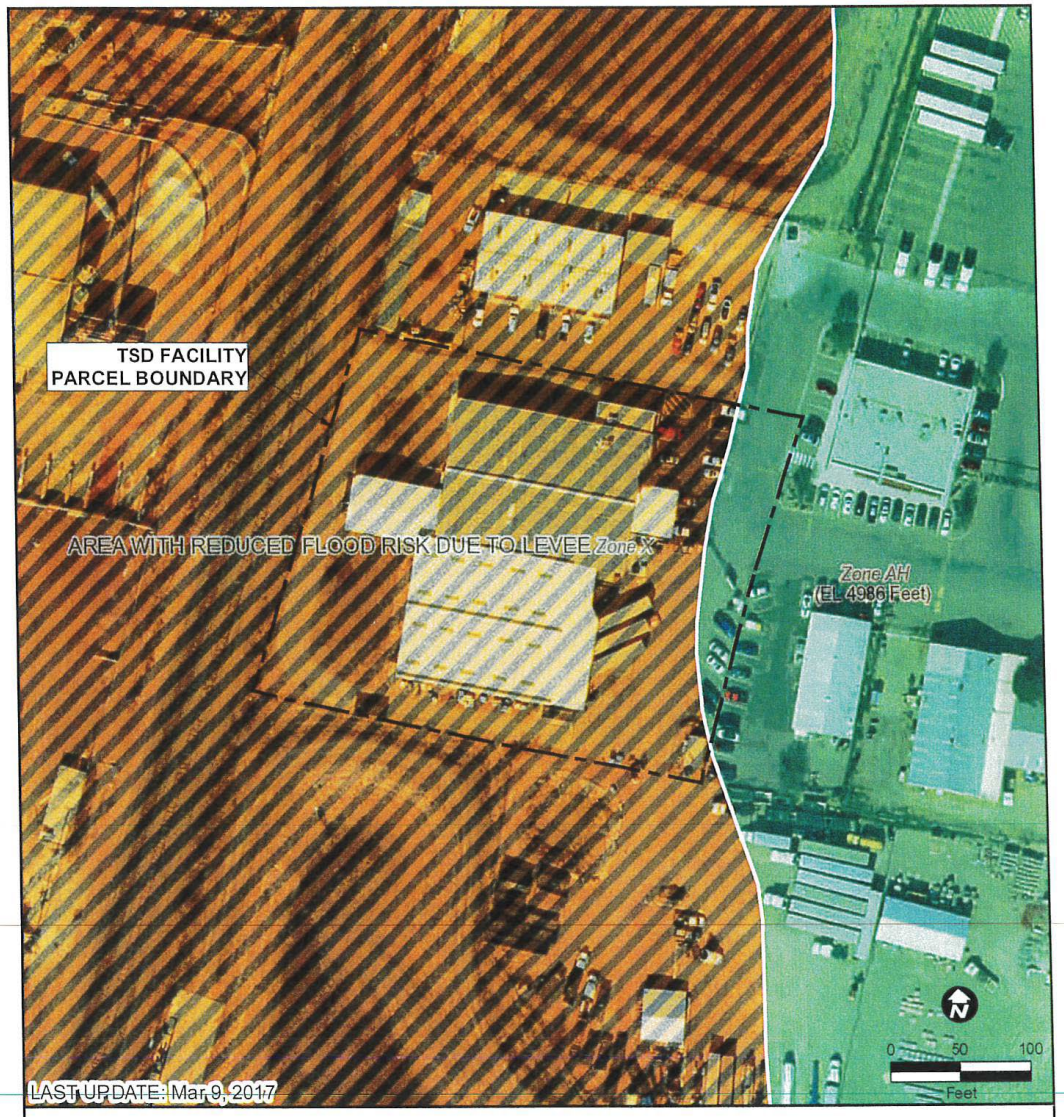


Figure 2: Wind Rose Map for Albuquerque


Advance Chemical Treatment
Albuquerque, New Mexico
Hazardous Waste Permit Renewal
Figure 3: Topographic Map
Drawn: CAL
Date: 6/27/2022
Approved: BHR
Dwg. No.: B17215-14
Figure B.11
TSD FACILITY PROPERTY BOUNDARY
CITY STORMWATER BASIN
BURLINGTON NORTHERN SANTA FE RAILROAD
GROUNDWATER FLOW DIRECTION (GENERALIZED)
FLOOD ZONE AH
1000' RADIUS
Drawing derived from Advanced Chemical Treatment, Topo200.



LEGEND

PROPERTY LINE

FLOOD HAZARD ZONE TYPE

AREA WITH REDUCED RISK DUE TO LEVEE

1% ANNUAL CHANCE FLOOD HAZARD

NOTES
1. THE FACILITY IS PREDOMINANTLY IN ZONE X, WITH A REDUCED FLOOD RISK DUE TO LEVEE.
2. ZONES DESIGNATED AH ARE SUBJECT TO INUNDATION BY 1% ANNUAL CHANCE OF SHALLOW FLOODING (USUALLY AREAS OF PONDING) WHERE AVERAGE DEPTHS ARE BETWEEN ONE AND THREE FEET.
3. ZONE AH SHOWN HAS A BASE FLOOD ELEVATION OF 4986 FEET.

Figure 4: Flood Plain Map

SOURCE:
NATIONAL FLOOD HAZARD LAYER, FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA)

File: Flood.mxd

ACT treatment

ACT TREATMENT
6137 EDITH BLVD. NE
ALBUQUERQUE, NM 87107

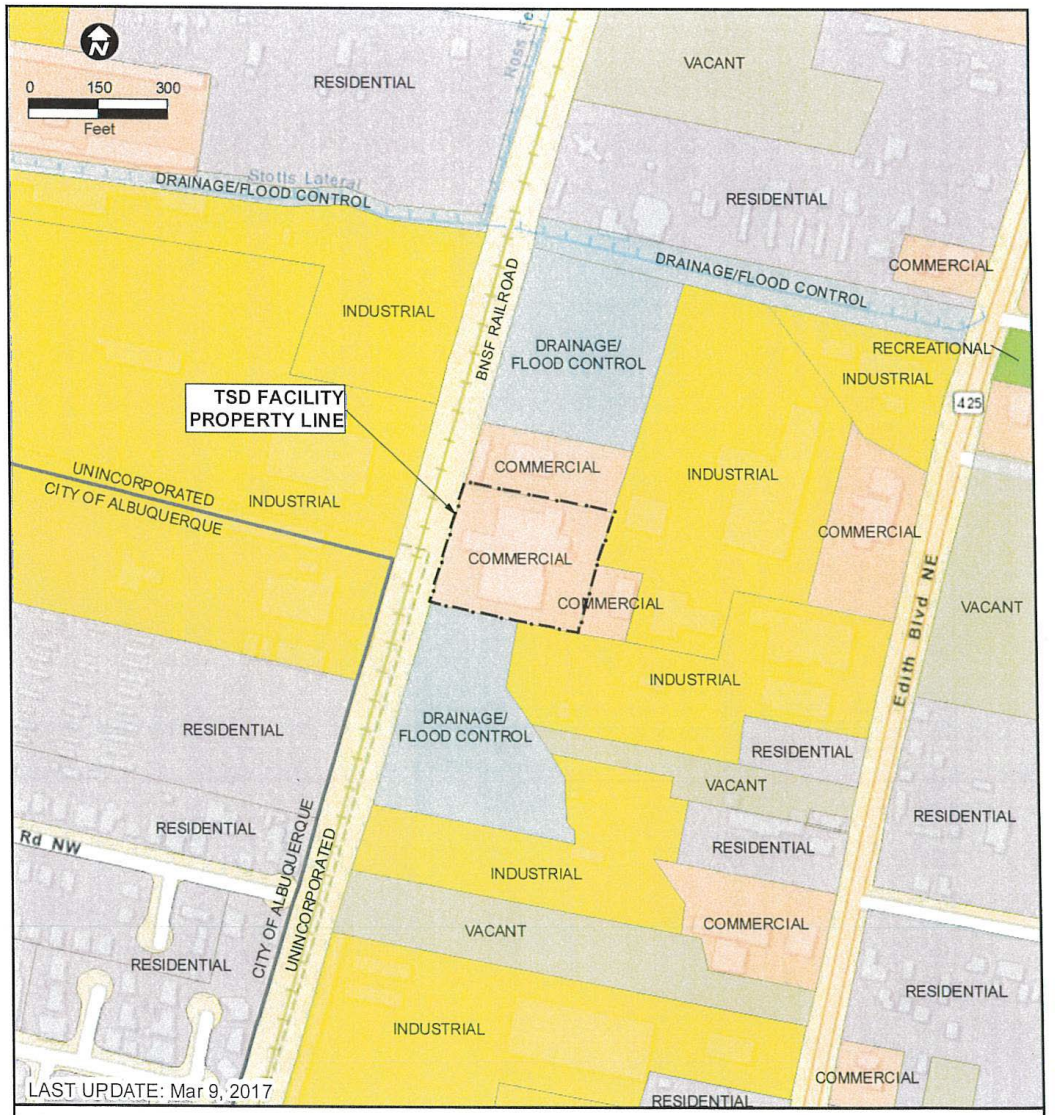


Figure 5: Land Use Map around the Facility

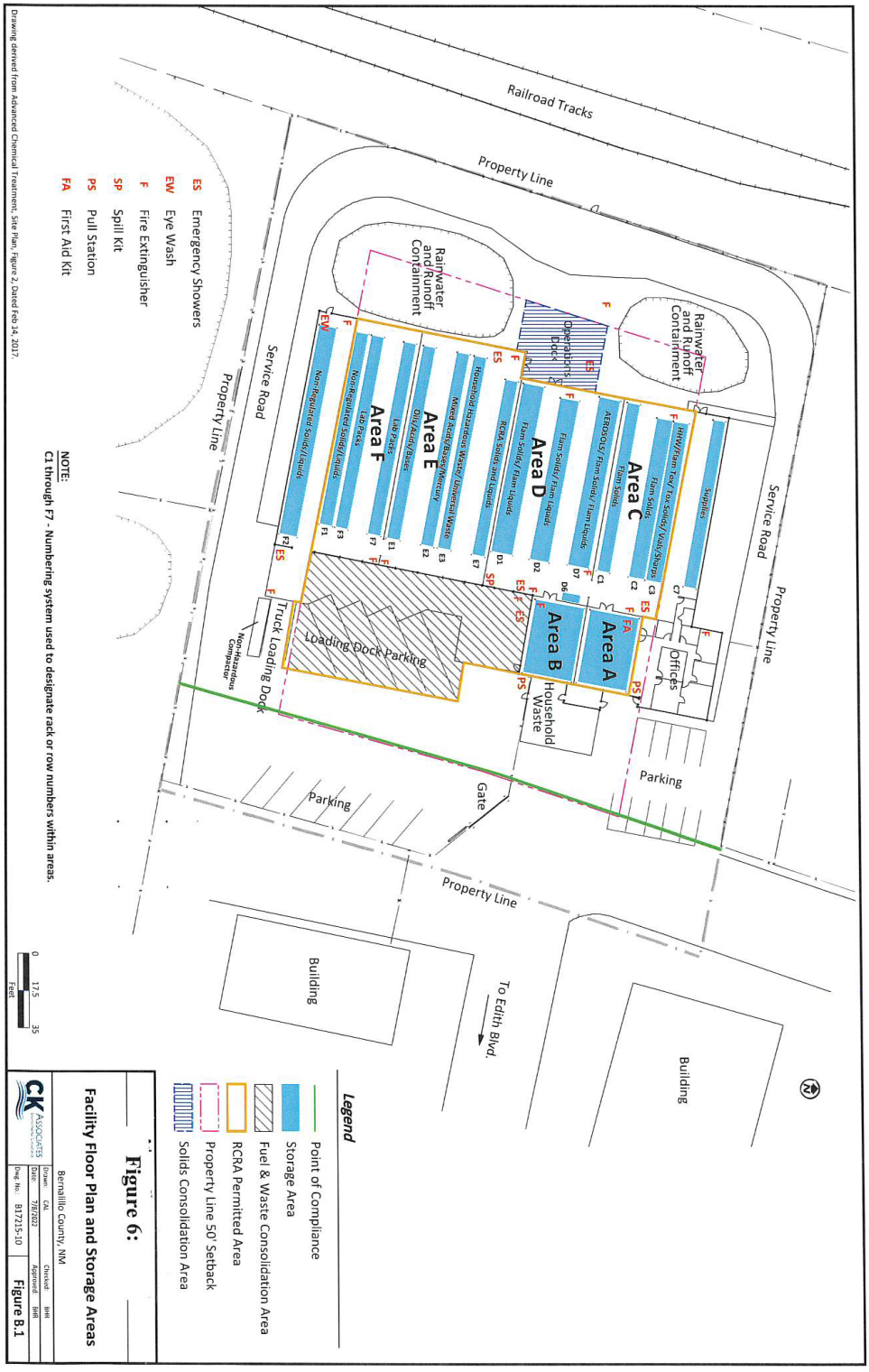


Figure 6:

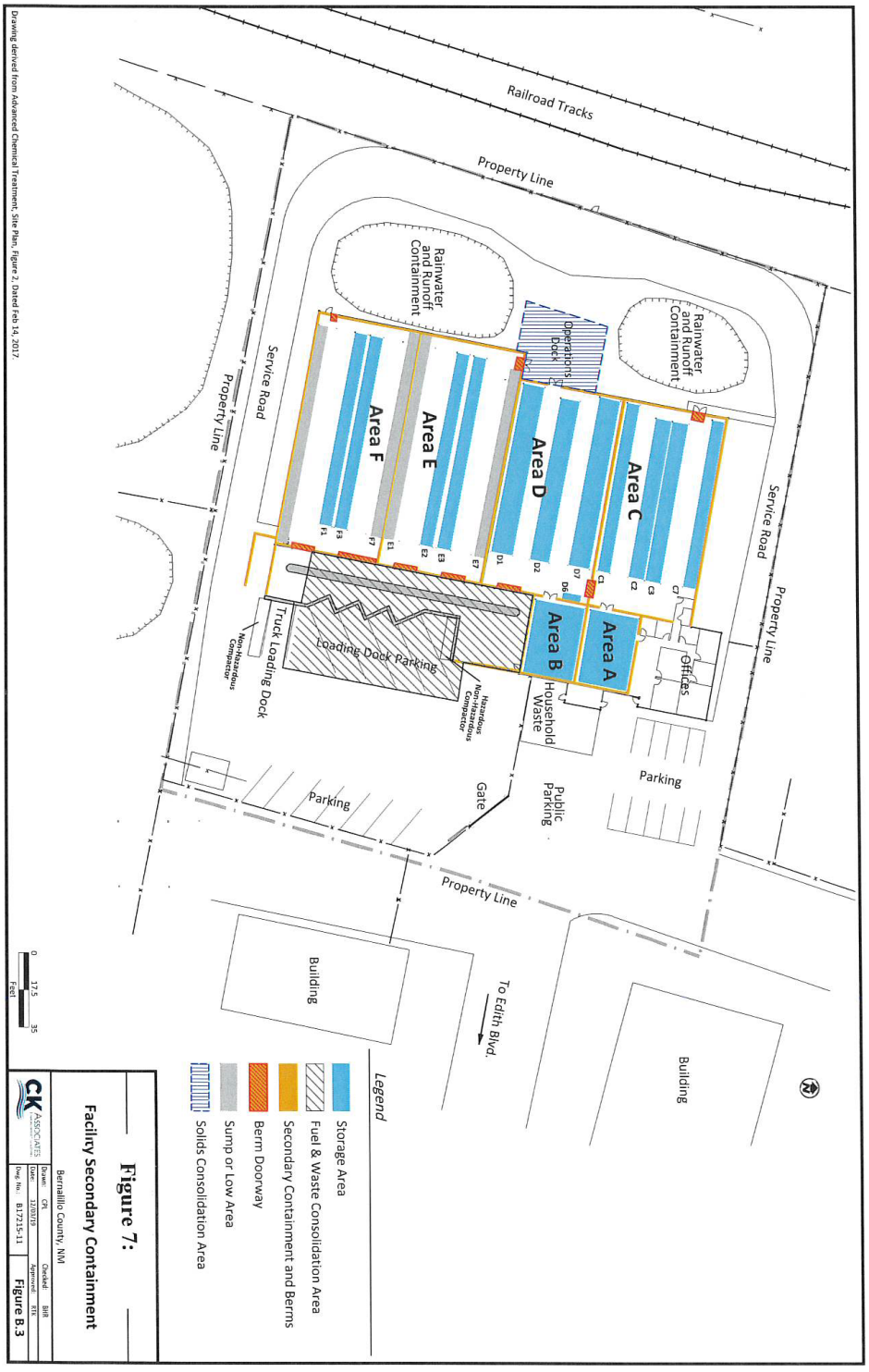
Facility Floor Plan and Storage Areas

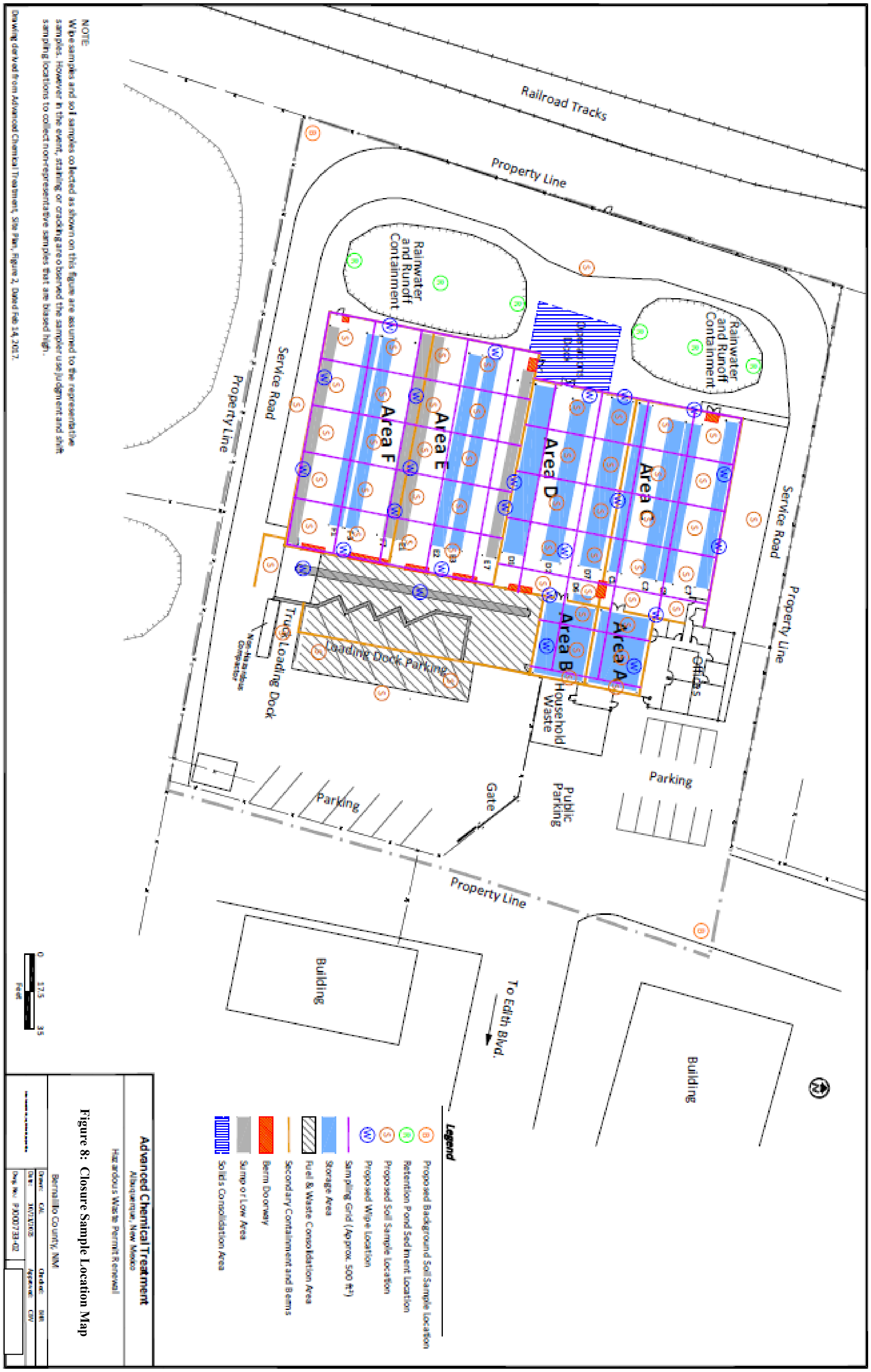
Bernalillo County, NM

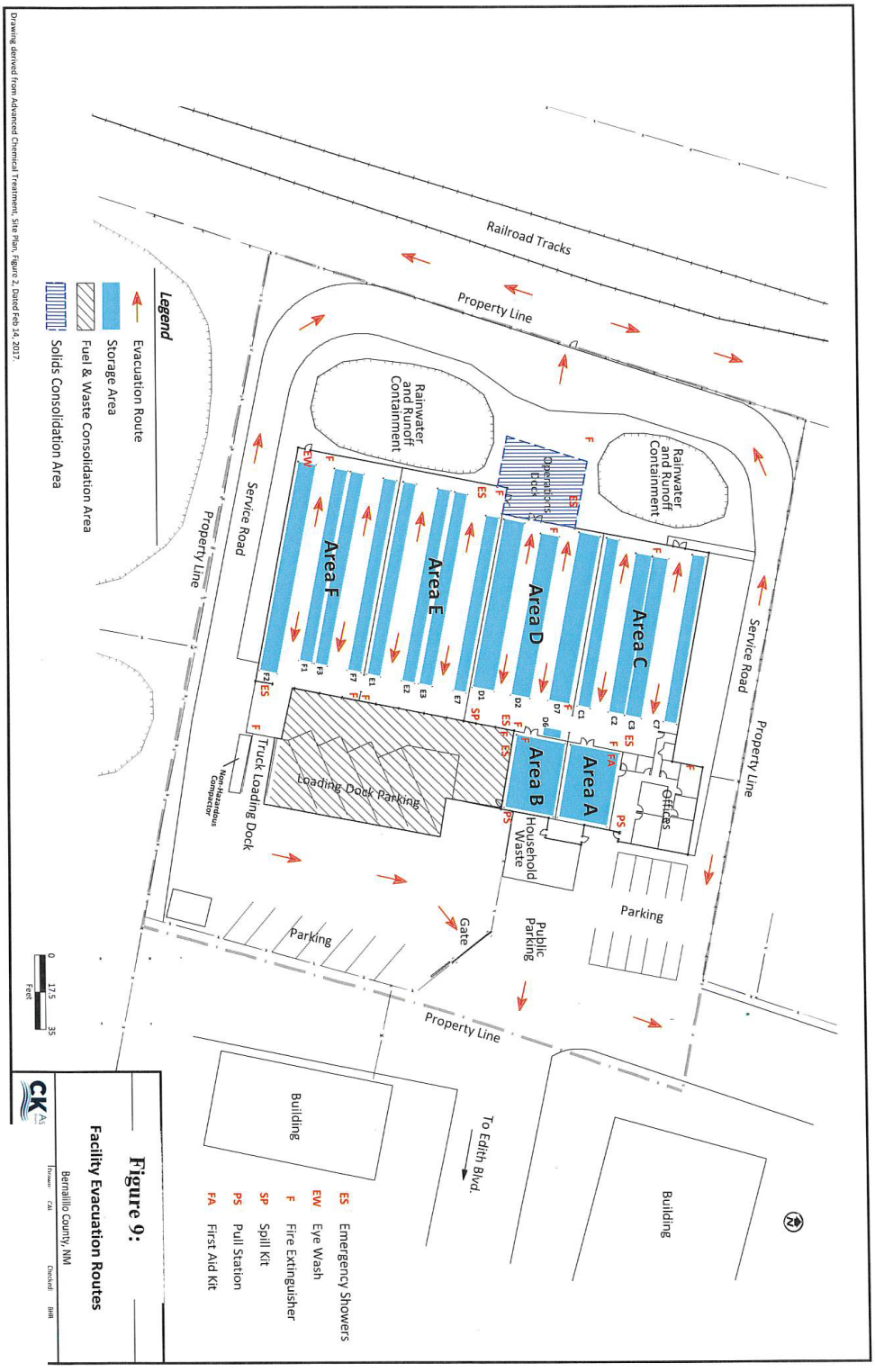
Drawn:	GAL	Checked:	BHR
Date:	7/8/2022	Approved:	BHR
Proj. No:	B17215-10		

CK Associates

Figure B.1


Railroad Tracks
Property Line
Rainwater and Runoff Containment
Operations Dock
Rainwater and Runoff Containment
Service Road
Property Line
Area F
Area E
Area D
Area C
Service Road
Property Line
Area B
Area A
Loading Dock Parking
Truck Loading Dock
Non-Hazardous Compactor
Hazardous Non-Hazardous Compactor
Household Waste
Offices
Parking
Parking
Gate
Public Parking
Property Line
Building
To Edith Blvd.
Building
Legend
Storage Area
Fuel & Waste Consolidation Area
Secondary Containment and Berms
Berm Doorway
Sump or Low Area
Solids Consolidation Area
0
17.5
35
Feet
Drawing derived from Advanced Chemical Treatment, Site Plan, Figure 2, Dated Feb 14, 2017.
Figure 7:
Facility Secondary Containment
Bernalillo County, NM
Drawn: CPL
Date: 12/07/17
Checked: BJR
Approved: RTK
Dwg. No. B17215-11
Figure B.3


NOTE
Wipe samples and soil samples collected as shown on this figure are assumed to the representative samples. However in the event, staining or cracking are observed the sampler use judgment and shift sampling locations to collect non-representative samples that are biased high.
Drawing derived from Advanced Chemical Treatment, Site Plan, Figure 2, Dated Feb 14, 2017.
Railroad Tracks
Property Line
Service Road
Rainwater and Runoff Containment
Area A
Area B
Area C
Area D
Area E
Area F
Offices
Household Waste
Truck Loading Dock
Loading Dock Parking
Parking
Public Parking
Gate
Building
To Edith Blvd.
0
17.5
35
Feet
Legend
Proposed Background Soil Sample Location
Retention Pond Sediment Location
Proposed Soil Sample Location
Proposed Wipe Location
Sampling Grid (Approx. 500 ft²)
Storage Area
Fuel & Waste Consolidation Area
Secondary Containment and Berms
Berm Doorway
Sump or Low Area
Solids Consolidation Area
Advanced Chemical Treatment
Albuquerque, New Mexico
Hazardous Waste Permit Renewal
Bernalillo County, NM
Figure 8: Closure Sample Location Map


Drawing derived from Advanced Chemical Treatment, Site Plan, Figure 2, Dated Feb 14, 2017
Legend
Evacuation Route
Storage Area
Fuel & Waste Consolidation Area
Solids Consolidation Area
Railroad Tracks
Property Line
Rainwater and Runoff Containment
Rainwater and Runoff Containment
Operations Dock
Service Road
Property Line
Area F
Area E
Area D
Area C
Area B
Area A
Truck Loading Dock
Non-Hazardous Compactor
Loading Dock Parking
Household Waste
Offices
Parking
Gate
Public Parking
Parking
Property Line
Building
To Edith Blvd.
Building
ES Emergency Showers
EW Eye Wash
F Fire Extinguisher
SP Spill Kit
PS Pull Station
FA First Aid Kit
0 17.5 35
Feet
Figure 9:
Facility Evacuation Routes
Bernalillo County, NM

APPENDIX M-1: FACILITY PHOTOGRAPHS

The following pages contain Figures 1 through 25, which are photographs showing the Advanced Chemical Treatment LLC Facility and its hazardous waste storage and treatment areas.

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A.5 - Facility Photographs

Contents

Figure 1. ACT Treatment looking west

Figure 2. Looking east from ACT Treatment towards Edith Blvd NE

Part A – A.5 – Facility Photographs

Figure 3. Gate entrance/exit that leads to loading/unloading dock

Figure 4. Gate entrance/exit that leads to the outside of the property

Figure 5. Receiving Area

Figure 6. Employees at Receiving Area

Figure 7. Dock near the Receiving Area

Figure 8. Parked trucks at the loading dock

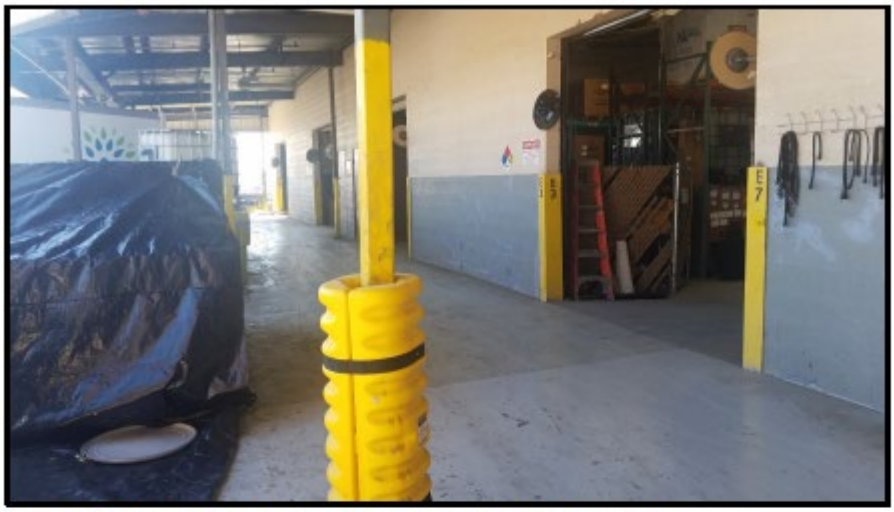

Figure 9. Roll up doors leading to Areas E and F and loading dock

Figure 10. Truck trailers backed into the loading dock

Figure 11. Compactor located on the south side of the loading dock

Figure 12. Compactor (right) and recycling containers (left)

Figure 13. Trash container at end of rear dock

Figure 14. Rear dock access doors

Figure 15. North side of rear dock

Figure 16. Warehouse A

Figure 17. Warehouse B

Figure 18. Warehouse C (C7)

Figure 19. Warehouse C (C3)

Figure 20. Warehouse C (C2)

Figure 21. Warehouse C (C1)

Figure 22. Warehouse D

Figure 23. Warehouse D

Figure 24. Warehouse E

Figure 25. Warehouse F