

**RESOURCE CONSERVATION AND RECOVERY ACT PERMIT
FACILITY OPERATING PERMIT**

ATTACHMENTS A THROUGH M

EPA ID No. NMD0002208627

issued to

**ADVANCED CHEMICAL TREATMENT LLC.
ALBUQUERQUE FACILITY**

for

HAZARDOUS WASTE STORAGE AND TREATMENT

Located in

BERNALILLO COUNTY, NEW MEXICO

Prepared by the

**NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS WASTE BUREAU
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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- Bulk/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 ≥ 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, K111-K115, K125-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, 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, K113-K115, K125-K126, K132, K136, K141-K145, K147-K151, U001-U002, U004-U005, U010-U012, U014-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-U080-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, F006-F009, 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 m³ (about 26 gallons) and in containers greater than 0.46 m³ (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	Any hazardous waste	- 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
	OR >119 gallons	Not “in light material service”	

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.