6.04.2019 CLASS II MOD

CLEAN EARTH OF ALABAMA, INC.

402 WEBSTER CHAPEL ROAD
Glencoe, AL 35905

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

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 an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
☐	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
	☐ Site was a TSD facility and/or generator of > 1,000 kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in **one or more months of the 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 Form

2. Site EPA ID Number

A	L	D	9	8	1	0	2	0	8	9	4

3. Site Name

Clean Earth of Alabama, INC.

4. Site Location Address

Street Address **402 Webster Chapel Road**		
City, Town, or Village **Glencoe**		County **Etowah**
State **Alabama**	Country **USA**	Zip Code **35905**

5. Site Mailing Address

☑ Same as Location 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.	**562112**
B.	**562111**	D.	

8. Site Contact Information

☑ Same as Location Address

First Name **John**	MI	Last Name **Black**
Title **General Manager**		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email **jblack@cleanearthinc.com**		
Phone **256.492.8340**	Ext **102**	Fax

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

☐ Same as Location Address

Full Name: Clean Earth Inc.		Date Became Owner (mm/dd/yyyy): 6/1/2016
Owner Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other		
Street Address: 334 S. Warminster Road		
City, Town, or Village: Hatboro		
State: Pennsylvania	Country: **USA**	Zip Code: 19040
Email		
Phone: 215.734.1400	Ext	Fax
Comments		

B. Name of Site's Legal Operator

☑ Same as Location Address

Full Name: Clean Earth of Alabama, Inc.		Date Became Operator (mm/dd/yyyy): 6/1/2016
Operator Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email		
Phone	Ext	Fax
Comments		

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 (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
	☐	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
	☐	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
If "Yes" above, indicate other generator activities in 2 and 3, as applicable.			
☐ 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.		
☐ Y ☑ N	3. Mixed Waste (hazardous and radioactive) Generator		
☑ Y ☐ N	4. Treater, Storer or Disposer of Hazardous Waste—Note: A hazardous waste Part B permit is required for these activities.		
☑ Y ☐ N	5. Receives Hazardous Waste from Off-site		
☐ Y ☑ N	6. Recycler of Hazardous Waste		
	☐	a. Recycler who stores prior to recycling	
	☐	b. Recycler who does not store prior to recycling	
☐ Y ☑ N	7. 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.

See	List					

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.

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. Other (specify) _____
☐	f. Other (specify) _____
☐	g. Other (specify) _____
☐ Y ☑ N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

☑ 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

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

☐ Y ☑ N	A. Opting into or currently operating under 40 CFR 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 univer-
☐ Y ☑ N	B. Withdrawing from 40 CFR 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 VSQGs 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) ☐ 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)

16. Notification of Hazardous Secondary Material (HSM) Activity

☐ Y ☑ N	A. 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), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
☐ Y ☑ N	B. Are you notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate? If "Yes", you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

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) 6/5/2019
Printed Name (First, Middle Initial Last) **John Black**	Title **General Manager**
Email **jblack@cleanearthinc.com**	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	**Bryan**	MI	**C**	Last Name	**Jones**
Title	**Area EH&S Manager**				
Email	**bjones@cleanearthinc.com**				
Phone	**256.492.8340**	Ext	**105**	Fax	

2. Facility Permit Contact Mailing Address

Street Address	**402 Webster Chapel Road**	
City, Town, or Village	**Glencoe**	
State **Alabama**	Country USA	Zip Code 35905

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

9/30/1986

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
N	**A L 0 0 6 6 2 1 4**	**NPDES STORM WATER PERMIT**
T	**A L D 9 8 1 0 2 0 8 9 4**	**AL HAZ WASTE TRANSPORTATION**

5. Nature of Business

CEA is a TSDF that specializes in fuel blending, consolidating/bulking, lab packs, shredding of waste pharmaceuticals.

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0	1	S	0	1	275,000	G	004	CONTAINER STORAGE
0	2	S	0	2	90,000	G	006	15,000 gal each tank
0	3	T	0	1	90,000	U	006	15,000 each tank-FUEL BL
0	4	T	0	4	14,000	J	002	SHREDDER

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	(2) Process Description (if code is not entered in 7.D1))
					See Attached List

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

EPA ID# | A | L | D | 9 | 8 | 1 | 0 | 2 | 0 | 8 | 9 | 4 |

7. Description of Hazardous Wastes

Line#	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES	
				(1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)
1	D 0 0 1	5,000	T	S01, S02, T01, T04	
2	D 0 0 2	2,000	T	S01, S02, T01, T04	
3	D 0 0 3	1,000	T	S01	
4	D 0 0 4	1,000	T	S01, S02, T01, T04	
5	D 0 0 5	1,000	T	S01, S02, T01, T04	
6	D 0 0 6	1,000	T	S01, S02, T01, T04	
7	D 0 0 7	1,000	T	S01, S02, T01, T04	
8	D 0 0 8	1,000	T	S01, S02, T01, T04	
9	D 0 0 9	1,000	T	S01, S02, T01, T04	
10	D 0 1 0	1,000	T	S01, S02, T01, T04	
11	D 0 1 1	1,000	T	S01, S02, T01, T04	
12	D 0 1 2	1,000	T	S01, S02, T01, T04	
13	D 0 1 3	1,000	T	S01, S02, T01, T04	
14	D 0 1 4	1,000	T	S01, S02, T01, T04	
15	D 0 1 5	1,000	T	S01, S02, T01, T04	
16	D 0 1 6	1,000	T	S01, S02, T01, T04	
17	D 0 1 7	1,000	T	S01, S02, T01, T04	
18	D 0 1 8	1,000	T	S01, S02, T01, T04	
19	D 0 1 9	1,000	T	S01, S02, T01, T04	
20	D 0 2 0	1,000	T	S01, S02, T01, T04	
21	D 0 2 1	1,000	T	S01, S02, T01, T04	
22	D 0 2 2	1,000	T	S01, S02, T01, T04	
23	D 0 2 3	1,000	T	S01, S02, T01, T04	
24	D 0 2 4	1,000	T	S01, S02, T01, T04	
25	D 0 2 5	1,000	T	S01, S02, T01, T04	
26	D 0 2 6	1,000	T	S01, S02, T01, T04	
27	D 0 2 7	1,000	T	S01, S02, T01, T04	
28	D 0 2 8	1,000	T	S01, S02, T01, T04	
29	D 0 2 9	1,000	T	S01, S02, T01, T04	
30	D 0 3 0	1,000	T	S01, S02, T01, T04	
31	D 0 3 1	1,000	T	S01, S02, T01, T04	
32	D 0 3 2	1,000	T	S01, S02, T01, T04	
33	D 0 3 3	1,000	T	S01, S02, T01, T04	
34	D 0 3 4	1,000	T	S01, S02, T01, T04	
35	D 0 3 5	1,000	T	S01, S02, T01, T04	
36	D 0 3 6	1,000	T	S01, S02, T01, T04	
37	D 0 3 7	1,000	T	S01, S02, T01, T04	
38	D 0 3 8	1,000	T	S01, S02, T01, T04	
39	D 0 3 9	1,000	T	S01, S02, T01, T04	
40	D 0 4 0	1,000	T	S01, S02, T01, T04	
41	D 0 4 1	1,000	T	S01, S02, T01, T04	

42	D	0	4	2	1,000	T	S01, S02, T01, T04	
43	D	0	4	3	1,000	T	S01, S02, T01, T04	
44	F	0	0	1	5,000	T	S01, S02, T01, T04	
45	F	0	0	2	5,000	T	S01, S02, T01, T04	
46	F	0	0	3	5,000	T	S01, S02, T01, T04	
47	F	0	0	4	5,000	T	S01, S02, T01, T04	
48	F	0	0	5	5,000	T	S01, S02, T01, T04	
49	F	0	0	6	1,000	T	S01, S02, T01, T04	
50	F	0	0	7	1,000	T	S01, S02, T01, T04	
51	F	0	0	8	1,000	T	S01, S02, T01, T04	
52	F	0	0	9	1,000	T	S01, S02, T01, T04	
53	F	0	1	0	1,000	T	S01, S02, T01, T04	
54	F	0	1	1	1,000	T	S01, S02, T01, T04	
55	F	0	1	2	1,000	T	S01, S02, T01, T04	
56	F	0	1	9	1,000	T	S01, S02, T01, T04	
57	F	0	2	0	1,000	T	S01, S02, T01, T04	
58	F	0	2	1	1,000	T	S01, S02, T01, T04	
59	F	0	2	2	1,000	T	S01, S02, T01, T04	
60	F	0	2	3	1,000	T	S01, S02, T01, T04	
61	F	0	2	4	1,000	T	S01, S02, T01, T04	
62	F	0	2	5	1,000	T	S01, S02, T01, T04	
63	F	0	2	6	1,000	T	S01, S02, T01, T04	
64	F	0	2	7	500	T	S01, S02, T01, T04	
65	F	0	2	8	500	T	S01, S02, T01, T04	
66	F	0	3	2	500	T	S01, S02, T01, T04	
67	F	0	3	4	500	T	S01, S02, T01, T04	
68	F	0	3	5	500	T	S01, S02, T01, T04	
69	F	0	3	7	500	T	S01, S02, T01, T04	
70	F	0	3	8	500	T	S01, S02, T01, T04	
71	F	0	3	9	500	T	S01, S02, T01, T04	
72	K	0	0	1	1,000	T	S01, S02, T01, T04	
73	K	0	0	2	1,000	T	S01, S02, T01, T04	
74	K	0	0	3	1,000	T	S01, S02, T01, T04	
75	K	0	0	4	1,000	T	S01, S02, T01, T04	
76	K	0	0	5	1,000	T	S01, S02, T01, T04	
77	K	0	0	6	1,000	T	S01, S02, T01, T04	
78	K	0	0	7	1,000	T	S01, S02, T01, T04	
79	K	0	0	8	1,000	T	S01, S02, T01, T04	
80	K	0	0	9	1,000	T	S01, S02, T01, T04	
81	K	0	1	0	1,000	T	S01, S02, T01, T04	
82	K	0	1	1	1,000	T	S01	
83	K	0	1	3	1,000	T	S01	
84	K	0	1	4	1,000	T	S01, S02, T01, T04	
85	K	0	1	5	1,000	T	S01, S02, T01, T04	
86	K	0	1	6	1,000	T	S01, S02, T01, T04	
87	K	0	1	7	1,000	T	S01, S02, T01, T04	

88	K	0	1	8	1,000	T	S01, S02, T01, T04	
89	K	0	1	9	1,000	T	S01, S02, T01, T04	
90	K	0	2	0	1,000	T	S01, S02, T01, T04	
91	K	0	2	1	1,000	T	S01, S02, T01, T04	
92	K	0	2	2	1,000	T	S01	
93	K	0	2	3	1,000	T	S01, S02, T01, T04	
94	K	0	2	4	1,000	T	S01, S02, T01, T04	
95	K	0	2	5	1,000	T	S01, S02, T01, T04	
96	K	0	2	6	1,000	T	S01, S02, T01, T04	
97	K	0	2	7	1,000	T	S01	
98	K	0	2	8	1,000	T	S01, S02, T01, T04	
99	K	0	2	9	1,000	T	S01, S02, T01, T04	
100	K	0	3	0	1,000	T	S01, S02, T01, T04	
101	K	0	3	1	1,000	T	S01	
102	K	0	3	2	1,000	T	S01, S02, T01, T04	
103	K	0	3	3	1,000	T	S01, S02, T01, T04	
104	K	0	3	4	1,000	T	S01	
105	K	0	3	5	1,000	T	S01, S02, T01, T04	
106	K	0	3	6	1,000	T	S01, S02, T01, T04	
107	K	0	3	7	1,000	T	S01, S02, T01, T04	
108	K	0	3	8	1,000	T	S01, S02, T01, T04	
109	K	0	3	9	1,000	T	S01, S02, T01, T04	
110	K	0	4	0	1,000	T	S01, S02, T01, T04	
111	K	0	4	1	1,000	T	S01, S02, T01, T04	
112	K	0	4	2	1,000	T	S01, S02, T01, T04	
113	K	0	4	3	1,000	T	S01, S02, T01, T04	
114	K	0	4	4	1,000	T	S01, S02, T01, T04	
115	K	0	4	5	1,000	T	S01	
116	K	0	4	6	1,000	T	S01, S02, T01, T04	
117	K	0	4	7	1,000	T	S01, S02, T01, T04	
118	K	0	4	8	1,000	T	S01, S02, T01, T04	
119	K	0	4	9	1,000	T	S01, S02, T01, T04	
120	K	0	5	0	1,000	T	S01, S02, T01, T04	
121	K	0	5	1	1,000	T	S01, S02, T01, T04	
122	K	0	5	2	1,000	T	S01, S02, T01, T04	
123	K	0	6	0	1,000	T	S01, S02, T01, T04	
124	K	0	6	1	1,000	T	S01, S02, T01, T04	
125	K	0	6	2	1,000	T	S01	
126	K	0	6	9	1,000	T	S01, S02, T01, T04	
127	K	0	7	1	1,000	T	S01, S02, T01, T04	
128	K	0	7	3	1,000	T	S01, S02, T01, T04	
129	K	0	8	3	1,000	T	S01, S02, T01, T04	
130	K	0	8	4	1,000	T	S01, S02, T01, T04	
131	K	0	8	5	1,000	T	S01, S02, T01, T04	
132	K	0	8	6	1,000	T	S01, S02, T01, T04	
133	K	0	8	7	1,000	T	S01, S02, T01, T04	

134	K	0	8	8	1,000	T	S01, S02, T01, T04	
135	K	0	9	3	1,000	T	S01, S02, T01, T04	
136	K	0	9	4	1,000	T	S01, S02, T01, T04	
137	K	0	9	5	1,000	T	S01, S02, T01, T04	
138	K	0	9	6	1,000	T	S01	
139	K	0	9	7	1,000	T	S01	
140	K	0	9	8	1,000	T	S01	
141	K	0	9	9	1,000	T	S01	
142	K	1	0	0	1,000	T	S01, S02, T01, T04	
143	K	1	0	1	1,000	T	S01, S02, T01, T04	
144	K	1	0	2	1,000	T	S01, S02, T01, T04	
145	K	1	0	3	1,000	T	S01, S02, T01, T04	
146	K	1	0	4	1,000	T	S01, S02, T01, T04	
147	K	1	0	5	1,000	T	S01, S02, T01, T04	
148	K	1	0	6	1,000	T	S01, S02, T01, T04	
149	K	1	0	7	1,000	T	S01	
150	K	1	0	8	1,000	T	S01, S02, T01, T04	
151	K	1	0	9	1,000	T	S01, S02, T01, T04	
152	K	1	1	0	1,000	T	S01, S02, T01, T04	
153	K	1	1	1	1,000	T	S01, S02, T01, T04	
154	K	1	1	2	1,000	T	S01, S02, T01, T04	
155	K	1	1	3	1,000	T	S01, S02, T01, T04	
156	K	1	1	4	1,000	T	S01, S02, T01, T04	
157	K	1	1	5	1,000	T	S01, S02, T01, T04	
158	K	1	1	6	1,000	T	S01, S02, T01, T04	
159	K	1	1	7	1,000	T	S01	
160	K	1	1	8	1,000	T	S01	
161	K	1	2	3	1,000	T	S01, S02, T01, T04	
162	K	1	2	4	1,000	T	S01	
163	K	1	2	5	1,000	T	S01, S02, T01, T04	
164	K	1	2	6	1,000	T	S01, S02, T01, T04	
165	K	1	3	1	1,000	T	S01, S02, T01, T04	
166	K	1	3	2	1,000	T	S01, S02, T01, T04	
167	K	1	2	6	1,000	T	S01, S02, T01, T04	
168	K	1	4	1	1,000	T	S01, S02, T01, T04	
169	K	1	4	2	1,000	T	S01, S02, T01, T04	
170	K	1	4	3	1,000	T	S01, S02, T01, T04	
171	K	1	4	4	1,000	T	S01, S02, T01, T04	
172	K	1	4	5	1,000	T	S01, S02, T01, T04	
173	K	1	4	7	1,000	T	S01, S02, T01, T04	
174	K	1	4	8	1,000	T	S01	
175	K	1	4	9	1,000	T	S01, S02, T01, T04	
176	K	1	5	0	1,000	T	S01, S02, T01, T04	
177	K	1	5	1	1,000	T	S01, S02, T01, T04	
178	K	1	5	6	1,000	T	S01, S02, T01, T04	
179	K	1	5	7	1,000	T	S01, S02, T01, T04	

180	K	1	5	8	1,000	T	S01, S02, T01, T04	
181	K	1	5	9	1,000	T	S01, S02, T01, T04	
182	K	1	6	1	1,000	T	S01, S02, T01, T04	
183	K	1	7	1	1,000	T	S01, S02, T01, T04	
184	K	1	7	2	1,000	T	S01, S02, T01, T04	
185	K	1	7	4	1,000	T	S01, S02, T01, T04	
186	K	1	7	5	1,000	T	S01, S02, T01, T04	
187	K	1	7	6	1,000	T	S01, S02, T01, T04	
188	K	1	7	7	1,000	T	S01, S02, T01, T04	
189	K	1	7	8	1,000	T	S01, S02, T01, T04	
190	K	1	8	1	1,000	T	S01, S02, T01, T04	
191	P	0	0	1	1,000	T	S01, S02, T01, T04	
192	P	0	0	2	1,000	T	S01, S02, T01, T04	
193	P	0	0	3	1,000	T	S01, S02, T01, T04	
194	P	0	0	4	1,000	T	S01, S02, T01, T04	
195	P	0	0	5	1,000	T	S01, S02, T01, T04	
196	P	0	0	6	1,000	T	S01	
197	P	0	0	7	1,000	T	S01, S02, T01, T04	
198	P	0	0	8	1,000	T	S01, S02, T01, T04	
199	P	0	0	9	1,000	T	S01, S02, T01, T04	
200	P	0	1	0	1,000	T	S01, S02, T01, T04	
201	P	0	1	1	1,000	T	S01, S02, T01, T04	
202	P	0	1	2	1,000	T	S01, S02, T01, T04	
203	P	0	1	3	1,000	T	S01, S02, T01, T04	
204	P	0	1	4	1,000	T	S01, S02, T01, T04	
205	P	0	1	5	1,000	T	S01, S02, T01, T04	
206	P	0	1	6	1,000	T	S01, S02, T01, T04	
207	P	0	1	7	1,000	T	S01, S02, T01, T04	
208	P	0	1	8	1,000	T	S01, S02, T01, T04	
209	P	0	2	0	1,000	T	S01, S02, T01, T04	
210	P	0	2	1	1,000	T	S01, S02, T01, T04	
211	P	0	2	2	1,000	T	S01, S02, T01, T04	
212	P	0	2	3	1,000	T	S01, S02, T01, T04	
213	P	0	2	4	1,000	T	S01, S02, T01, T04	
214	P	0	2	6	1,000	T	S01, S02, T01, T04	
215	P	0	2	7	1,000	T	S01, S02, T01, T04	
216	P	0	2	8	1,000	T	S01, S02, T01, T04	
217	P	0	2	9	1,000	T	S01, S02, T01, T04	
218	P	0	3	0	1,000	T	S01, S02, T01, T04	
219	P	0	3	1	1,000	T	S01, S02, T01, T04	
220	P	0	3	3	1,000	T	S01, S02, T01, T04	
221	P	0	3	4	1,000	T	S01, S02, T01, T04	
222	P	0	3	6	1,000	T	S01, S02, T01, T04	
223	P	0	3	7	1,000	T	S01, S02, T01, T04	
224	P	0	3	8	1,000	T	S01, S02, T01, T04	
225	P	0	3	9	1,000	T	S01, S02, T01, T04	

226	P	0	4	0	1,000	T	S01, S02, T01, T04	
227	P	0	4	1	1,000	T	S01, S02, T01, T04	
228	P	0	4	2	1,000	T	S01, S02, T01, T04	
229	P	0	4	3	1,000	T	S01, S02, T01, T04	
230	P	0	4	4	1,000	T	S01, S02, T01, T04	
231	P	0	4	5	1,000	T	S01, S02, T01, T04	
232	P	0	4	6	1,000	T	S01, S02, T01, T04	
233	P	0	4	7	1,000	T	S01, S02, T01, T04	
234	P	0	4	8	1,000	T	S01, S02, T01, T04	
235	P	0	4	9	1,000	T	S01, S02, T01, T04	
236	P	0	5	0	1,000	T	S01, S02, T01, T04	
237	P	0	5	1	1,000	T	S01, S02, T01, T04	
238	P	0	5	4	1,000	T	S01, S02, T01, T04	
239	P	0	5	6	1,000	T	S01, S02, T01, T04	
240	P	0	5	7	1,000	T	S01, S02, T01, T04	
241	P	0	5	8	1,000	T	S01, S02, T01, T04	
242	P	0	5	9	1,000	T	S01, S02, T01, T04	
243	P	0	6	0	1,000	T	S01, S02, T01, T04	
244	P	0	6	2	1,000	T	S01, S02, T01, T04	
245	P	0	6	3	1,000	T	S01, S02, T01, T04	
246	P	0	6	4	1,000	T	S01, S02, T01, T04	
247	P	0	6	5	1,000	T	S01, S02, T01, T04	
248	P	0	6	6	1,000	T	S01, S02, T01, T04	
249	P	0	6	7	1,000	T	S01, S02, T01, T04	
250	P	0	6	8	1,000	T	S01, S02, T01, T04	
251	P	0	6	9	1,000	T	S01, S02, T01, T04	
252	P	0	7	0	1,000	T	S01, S02, T01, T04	
253	P	0	7	1	1,000	T	S01, S02, T01, T04	
254	P	0	7	2	1,000	T	S01, S02, T01, T04	
255	P	0	7	3	1,000	T	S01, S02, T01, T04	
256	P	0	7	4	1,000	T	S01, S02, T01, T04	
257	P	0	7	5	1,000	T	S01, S02, T01, T04	
258	P	0	7	6	1,000	T	S01, S02, T01, T04	
259	P	0	7	7	1,000	T	S01, S02, T01, T04	
260	P	0	7	8	1,000	T	S01, S02, T01, T04	
261	P	0	8	1	1,000	T	S01, S02, T01, T04	
262	P	0	8	2	1,000	T	S01, S02, T01, T04	
263	P	0	8	4	1,000	T	S01, S02, T01, T04	
264	P	0	8	5	1,000	T	S01, S02, T01, T04	
265	P	0	8	6	1,000	T	S01, S02, T01, T04	
266	P	0	8	7	1,000	T	S01, S02, T01, T04	
267	P	0	8	8	1,000	T	S01, S02, T01, T04	
268	P	0	8	9	1,000	T	S01, S02, T01, T04	
269	P	0	9	2	1,000	T	S01, S02, T01, T04	
270	P	0	9	3	1,000	T	S01, S02, T01, T04	
271	P	0	9	4	1,000	T	S01, S02, T01, T04	

272	P	0	9	5	1,000	T	S01, S02, T01, T04	
273	P	0	9	6	1,000	T	S01, S02, T01, T04	
274	P	0	9	7	1,000	T	S01, S02, T01, T04	
275	P	0	9	8	1,000	T	S01, S02, T01, T04	
276	P	0	9	9	1,000	T	S01, S02, T01, T04	
277	P	1	0	1	1,000	T	S01, S02, T01, T04	
278	P	1	0	2	1,000	T	S01, S02, T01, T04	
279	P	1	0	3	1,000	T	S01, S02, T01, T04	
280	P	1	0	4	1,000	T	S01, S02, T01, T04	
281	P	1	0	5	1,000	T	S01, S02, T01, T04	
282	P	1	0	6	1,000	T	S01, S02, T01, T04	
283	P	1	0	8	1,000	T	S01, S02, T01, T04	
284	P	1	0	9	1,000	T	S01, S02, T01, T04	
285	P	1	1	0	1,000	T	S01, S02, T01, T04	
286	P	1	1	1	1,000	T	S01, S02, T01, T04	
287	P	1	1	2	1,000	T	S01, S02, T01, T04	
288	P	1	1	3	1,000	T	S01, S02, T01, T04	
289	P	1	1	4	1,000	T	S01, S02, T01, T04	
290	P	1	1	5	1,000	T	S01, S02, T01, T04	
291	P	1	1	6	1,000	T	S01, S02, T01, T04	
292	P	1	1	8	1,000	T	S01, S02, T01, T04	
293	P	1	1	9	1,000	T	S01, S02, T01, T04	
294	P	1	2	0	1,000	T	S01, S02, T01, T04	
295	P	1	2	1	1,000	T	S01, S02, T01, T04	
296	P	1	2	2	1,000	T	S01, S02, T01, T04	
297	P	1	2	3	1,000	T	S01, S02, T01, T04	
298	P	1	2	7	1,000	T	S01, S02, T01, T04	
299	P	1	2	8	1,000	T	S01, S02, T01, T04	
300	P	1	8	5	1,000	T	S01, S02, T01, T04	
301	P	1	8	8	1,000	T	S01, S02, T01, T04	
302	P	1	8	9	1,000	T	S01, S02, T01, T04	
303	P	1	9	0	1,000	T	S01, S02, T01, T04	
304	P	1	9	1	1,000	T	S01, S02, T01, T04	
305	P	1	9	2	1,000	T	S01, S02, T01, T04	
306	P	1	9	4	1,000	T	S01, S02, T01, T04	
307	P	1	9	6	1,000	T	S01, S02, T01, T04	
308	P	1	9	7	1,000	T	S01, S02, T01, T04	
309	P	1	9	8	1,000	T	S01, S02, T01, T04	
310	P	1	9	9	1,000	T	S01, S02, T01, T04	
311	P	2	0	1	1,000	T	S01, S02, T01, T04	
312	P	2	0	2	1,000	T	S01, S02, T01, T04	
313	P	2	0	3	1,000	T	S01, S02, T01, T04	
314	P	2	0	4	1,000	T	S01, S02, T01, T04	
315	P	2	0	5	1,000	T	S01, S02, T01, T04	
316	U	0	0	1	1,000	T	S01, S02, T01, T04	
317	U	0	0	2	1,000	T	S01, S02, T01, T04	

318	U	0	0	3	1,000	T	S01, S02, T01, T04	
319	U	0	0	4	1,000	T	S01, S02, T01, T04	
320	U	0	0	5	1,000	T	S01, S02, T01, T04	
321	U	0	0	6	1,000	T	S01, S02, T01, T04	
322	U	0	0	7	1,000	T	S01, S02, T01, T04	
323	U	0	0	8	1,000	T	S01, S02, T01, T04	
324	U	0	0	9	1,000	T	S01, S02, T01, T04	
325	U	0	1	0	1,000	T	S01, S02, T01, T04	
326	U	0	1	1	1,000	T	S01, S02, T01, T04	
327	U	0	1	2	1,000	T	S01, S02, T01, T04	
328	U	0	1	3	1,000	T	S01, S02, T01, T04	
329	U	0	1	4	1,000	T	S01, S02, T01, T04	
330	U	0	1	5	1,000	T	S01, S02, T01, T04	
331	U	0	1	6	1,000	T	S01, S02, T01, T04	
332	U	0	1	7	1,000	T	S01, S02, T01, T04	
333	U	0	1	8	1,000	T	S01, S02, T01, T04	
334	U	0	1	9	1,000	T	S01, S02, T01, T04	
335	U	0	2	0	1,000	T	S01, S02, T01, T04	
336	U	0	2	1	1,000	T	S01, S02, T01, T04	
337	U	0	2	2	1,000	T	S01, S02, T01, T04	
338	U	0	2	3	1,000	T	S01, S02, T01, T04	
339	U	0	2	4	1,000	T	S01, S02, T01, T04	
340	U	0	2	5	1,000	T	S01, S02, T01, T04	
341	U	0	2	6	1,000	T	S01, S02, T01, T04	
342	U	0	2	7	1,000	T	S01, S02, T01, T04	
343	U	0	2	8	1,000	T	S01, S02, T01, T04	
344	U	0	2	9	1,000	T	S01, S02, T01, T04	
345	U	0	3	0	1,000	T	S01, S02, T01, T04	
346	U	0	3	1	1,000	T	S01, S02, T01, T04	
347	U	0	3	2	1,000	T	S01, S02, T01, T04	
348	U	0	3	3	1,000	T	S01, S02, T01, T04	
349	U	0	3	4	1,000	T	S01, S02, T01, T04	
350	U	0	3	5	1,000	T	S01, S02, T01, T04	
351	U	0	3	6	1,000	T	S01, S02, T01, T04	
352	U	0	3	7	1,000	T	S01, S02, T01, T04	
353	U	0	3	8	1,000	T	S01, S02, T01, T04	
354	U	0	3	9	1,000	T	S01, S02, T01, T04	
355	U	0	4	1	1,000	T	S01, S02, T01, T04	
356	U	0	4	2	1,000	T	S01, S02, T01, T04	
357	U	0	4	3	1,000	T	S01, S02, T01, T04	
358	U	0	4	4	1,000	T	S01, S02, T01, T04	
359	U	0	4	5	1,000	T	S01, S02, T01, T04	
360	U	0	4	6	1,000	T	S01, S02, T01, T04	
361	U	0	4	7	1,000	T	S01, S02, T01, T04	
362	U	0	4	8	1,000	T	S01, S02, T01, T04	
363	U	0	4	9	1,000	T	S01, S02, T01, T04	

364	U	0	5	0	1,000	T	S01, S02, T01, T04	
365	U	0	5	1	1,000	T	S01, S02, T01, T04	
366	U	0	5	2	1,000	T	S01, S02, T01, T04	
367	U	0	5	3	1,000	T	S01, S02, T01, T04	
368	U	0	5	5	1,000	T	S01, S02, T01, T04	
369	U	0	5	6	1,000	T	S01, S02, T01, T04	
370	U	0	5	7	1,000	T	S01, S02, T01, T04	
371	U	0	5	8	1,000	T	S01, S02, T01, T04	
372	U	0	5	9	1,000	T	S01, S02, T01, T04	
373	U	0	6	0	1,000	T	S01, S02, T01, T04	
374	U	0	6	1	1,000	T	S01	
375	U	0	6	2	1,000	T	S01, S02, T01, T04	
376	U	0	6	3	1,000	T	S01, S02, T01, T04	
377	U	0	6	4	1,000	T	S01, S02, T01, T04	
378	U	0	6	6	1,000	T	S01, S02, T01, T04	
379	U	0	6	7	1,000	T	S01, S02, T01, T04	
380	U	0	6	8	1,000	T	S01, S02, T01, T04	
381	U	0	6	9	1,000	T	S01, S02, T01, T04	
382	U	0	7	0	1,000	T	S01, S02, T01, T04	
383	U	0	7	1	1,000	T	S01, S02, T01, T04	
384	U	0	7	2	1,000	T	S01, S02, T01, T04	
385	U	0	7	3	1,000	T	S01, S02, T01, T04	
386	U	0	7	4	1,000	T	S01, S02, T01, T04	
387	U	0	7	5	1,000	T	S01, S02, T01, T04	
388	U	0	7	6	1,000	T	S01, S02, T01, T04	
389	U	0	7	7	1,000	T	S01, S02, T01, T04	
390	U	0	7	8	1,000	T	S01, S02, T01, T04	
391	U	0	7	9	1,000	T	S01, S02, T01, T04	
392	U	0	8	0	1,000	T	S01, S02, T01, T04	
393	U	0	8	1	1,000	T	S01, S02, T01, T04	
394	U	0	8	2	1,000	T	S01, S02, T01, T04	
395	U	0	8	3	1,000	T	S01, S02, T01, T04	
396	U	0	8	4	1,000	T	S01, S02, T01, T04	
397	U	0	8	5	1,000	T	S01, S02, T01, T04	
398	U	0	8	6	1,000	T	S01, S02, T01, T04	
399	U	0	8	7	1,000	T	S01, S02, T01, T04	
400	U	0	8	8	1,000	T	S01, S02, T01, T04	
401	U	0	8	9	1,000	T	S01, S02, T01, T04	
402	U	0	9	0	1,000	T	S01, S02, T01, T04	
403	U	0	9	1	1,000	T	S01, S02, T01, T04	
404	U	0	9	2	1,000	T	S01, S02, T01, T04	
405	U	0	9	3	1,000	T	S01, S02, T01, T04	
406	U	0	9	4	1,000	T	S01, S02, T01, T04	
407	U	0	9	5	1,000	T	S01, S02, T01, T04	
408	U	0	9	6	1,000	T	S01, S02, T01, T04	
409	U	0	9	7	1,000	T	S01, S02, T01, T04	

410	U	0	9	8	1,000	T	S01, S02, T01, T04	
411	U	0	9	9	1,000	T	S01, S02, T01, T04	
412	U	1	0	1	1,000	T	S01, S02, T01, T04	
413	U	1	0	2	1,000	T	S01, S02, T01, T04	
414	U	1	0	3	1,000	T	S01, S02, T01, T04	
415	U	1	0	5	1,000	T	S01, S02, T01, T04	
416	U	1	0	6	1,000	T	S01, S02, T01, T04	
417	U	1	0	7	1,000	T	S01, S02, T01, T04	
418	U	1	0	8	1,000	T	S01, S02, T01, T04	
419	U	1	0	9	1,000	T	S01, S02, T01, T04	
420	U	1	1	0	1,000	T	S01, S02, T01, T04	
421	U	1	1	1	1,000	T	S01, S02, T01, T04	
422	U	1	1	2	1,000	T	S01, S02, T01, T04	
423	U	1	1	3	1,000	T	S01, S02, T01, T04	
424	U	1	1	4	1,000	T	S01, S02, T01, T04	
425	U	1	1	5	1,000	T	S01, S02, T01, T04	
426	U	1	1	6	1,000	T	S01, S02, T01, T04	
427	U	1	1	7	1,000	T	S01, S02, T01, T04	
428	U	1	1	8	1,000	T	S01, S02, T01, T04	
429	U	1	1	9	1,000	T	S01, S02, T01, T04	
430	U	1	2	0	1,000	T	S01, S02, T01, T04	
431	U	1	2	1	1,000	T	S01, S02, T01, T04	
432	U	1	2	2	1,000	T	S01, S02, T01, T04	
433	U	1	2	3	1,000	T	S01, S02, T01, T04	
434	U	1	2	4	1,000	T	S01, S02, T01, T04	
435	U	1	2	5	1,000	T	S01, S02, T01, T04	
436	U	1	2	6	1,000	T	S01, S02, T01, T04	
437	U	1	2	7	1,000	T	S01, S02, T01, T04	
438	U	1	2	8	1,000	T	S01, S02, T01, T04	
439	U	1	2	9	1,000	T	S01, S02, T01, T04	
440	U	1	3	0	1,000	T	S01, S02, T01, T04	
441	U	1	3	1	1,000	T	S01, S02, T01, T04	
442	U	1	3	2	1,000	T	S01, S02, T01, T04	
443	U	1	3	3	1,000	T	S01, S02, T01, T04	
444	U	1	3	4	1,000	T	S01, S02, T01, T04	
445	U	1	3	5	1,000	T	S01, S02, T01, T04	
446	U	1	3	6	1,000	T	S01, S02, T01, T04	
447	U	1	3	7	1,000	T	S01, S02, T01, T04	
448	U	1	3	8	1,000	T	S01, S02, T01, T04	
449	U	1	4	0	1,000	T	S01, S02, T01, T04	
450	U	1	4	1	1,000	T	S01, S02, T01, T04	
451	U	1	4	2	1,000	T	S01, S02, T01, T04	
452	U	1	4	3	1,000	T	S01, S02, T01, T04	
453	U	1	4	4	1,000	T	S01, S02, T01, T04	
454	U	1	4	5	1,000	T	S01, S02, T01, T04	
455	U	1	4	6	1,000	T	S01, S02, T01, T04	

456	U	1	4	7	1,000	T	S01, S02, T01, T04	
457	U	1	4	8	1,000	T	S01, S02, T01, T04	
458	U	1	4	9	1,000	T	S01, S02, T01, T04	
459	U	1	5	0	1,000	T	S01, S02, T01, T04	
460	U	1	5	1	1,000	T	S01, S02, T01, T04	
461	U	1	5	2	1,000	T	S01, S02, T01, T04	
462	U	1	5	3	1,000	T	S01, S02, T01, T04	
463	U	1	5	4	1,000	T	S01, S02, T01, T04	
464	U	1	5	5	1,000	T	S01, S02, T01, T04	
465	U	1	5	6	1,000	T	S01, S02, T01, T04	
466	U	1	5	7	1,000	T	S01, S02, T01, T04	
467	U	1	5	8	1,000	T	S01, S02, T01, T04	
468	U	1	5	9	1,000	T	S01, S02, T01, T04	
469	U	1	6	0	1,000	T	S01, S02, T01, T04	
470	U	1	6	1	1,000	T	S01, S02, T01, T04	
471	U	1	6	2	1,000	T	S01, S02, T01, T04	
472	U	1	6	3	1,000	T	S01, S02, T01, T04	
473	U	1	6	4	1,000	T	S01, S02, T01, T04	
474	U	1	6	5	1,000	T	S01, S02, T01, T04	
475	U	1	6	6	1,000	T	S01, S02, T01, T04	
476	U	1	6	7	1,000	T	S01, S02, T01, T04	
477	U	1	6	8	1,000	T	S01, S02, T01, T04	
478	U	1	6	9	1,000	T	S01, S02, T01, T04	
479	U	1	7	0	1,000	T	S01, S02, T01, T04	
480	U	1	7	1	1,000	T	S01, S02, T01, T04	
481	U	1	7	2	1,000	T	S01, S02, T01, T04	
482	U	1	7	3	1,000	T	S01, S02, T01, T04	
483	U	1	7	4	1,000	T	S01, S02, T01, T04	
484	U	1	7	6	1,000	T	S01, S02, T01, T04	
485	U	1	7	7	1,000	T	S01, S02, T01, T04	
486	U	1	7	8	1,000	T	S01, S02, T01, T04	
487	U	1	8	0	1,000	T	S01, S02, T01, T04	
488	U	1	8	1	1,000	T	S01, S02, T01, T04	
489	U	1	8	2	1,000	T	S01, S02, T01, T04	
490	U	1	8	3	1,000	T	S01, S02, T01, T04	
491	U	1	8	4	1,000	T	S01, S02, T01, T04	
492	U	1	8	5	1,000	T	S01, S02, T01, T04	
493	U	1	8	6	1,000	T	S01, S02, T01, T04	
494	U	1	8	7	1,000	T	S01, S02, T01, T04	
495	U	1	8	8	1,000	T	S01, S02, T01, T04	
496	U	1	8	9	1,000	T	S01, S02, T01, T04	
497	U	1	9	0	1,000	T	S01, S02, T01, T04	
498	U	1	9	1	1,000	T	S01, S02, T01, T04	
499	U	1	9	2	1,000	T	S01, S02, T01, T04	
500	U	1	9	3	1,000	T	S01, S02, T01, T04	
501	U	1	9	4	1,000	T	S01, S02, T01, T04	

502	U	1	9	6	1,000	T	S01, S02, T01, T04	
503	U	1	9	7	1,000	T	S01, S02, T01, T04	
504	U	2	0	0	1,000	T	S01, S02, T01, T04	
505	U	2	0	1	1,000	T	S01, S02, T01, T04	
506	U	2	0	2	1,000	T	S01, S02, T01, T04	
507	U	2	0	3	1,000	T	S01, S02, T01, T04	
508	U	2	0	4	1,000	T	S01, S02, T01, T04	
509	U	2	0	5	1,000	T	S01, S02, T01, T04	
510	U	2	0	6	1,000	T	S01, S02, T01, T04	
511	U	2	0	7	1,000	T	S01, S02, T01, T04	
512	U	2	0	8	1,000	T	S01, S02, T01, T04	
513	U	2	0	9	1,000	T	S01, S02, T01, T04	
514	U	2	1	0	1,000	T	S01, S02, T01, T04	
515	U	2	1	1	1,000	T	S01, S02, T01, T04	
516	U	2	1	3	1,000	T	S01, S02, T01, T04	
517	U	2	1	4	1,000	T	S01, S02, T01, T04	
518	U	2	1	5	1,000	T	S01, S02, T01, T04	
519	U	2	1	6	1,000	T	S01, S02, T01, T04	
520	U	2	1	7	1,000	T	S01, S02, T01, T04	
521	U	2	1	8	1,000	T	S01, S02, T01, T04	
522	U	2	1	9	1,000	T	S01, S02, T01, T04	
523	U	2	2	0	1,000	T	S01, S02, T01, T04	
524	U	2	2	1	1,000	T	S01, S02, T01, T04	
525	U	2	2	3	1,000	T	S01, S02, T01, T04	
526	U	2	2	5	1,000	T	S01, S02, T01, T04	
527	U	2	2	6	1,000	T	S01, S02, T01, T04	
528	U	2	2	7	1,000	T	S01, S02, T01, T04	
529	U	2	2	8	1,000	T	S01, S02, T01, T04	
530	U	2	3	4	1,000	T	S01, S02, T01, T04	
531	U	2	3	5	1,000	T	S01, S02, T01, T04	
532	U	2	3	6	1,000	T	S01, S02, T01, T04	
533	U	2	3	7	1,000	T	S01, S02, T01, T04	
534	U	2	3	8	1,000	T	S01, S02, T01, T04	
535	U	2	3	9	1,000	T	S01, S02, T01, T04	
536	U	2	4	0	1,000	T	S01, S02, T01, T04	
537	U	2	4	3	1,000	T	S01, S02, T01, T04	
538	U	2	4	4	1,000	T	S01, S02, T01, T04	
539	U	2	4	6	1,000	T	S01, S02, T01, T04	
540	U	2	4	7	1,000	T	S01, S02, T01, T04	
541	U	2	4	8	1,000	T	S01, S02, T01, T04	
542	U	2	4	9	1,000	T	S01, S02, T01, T04	
543	U	3	2	8	1,000	T	S01, S02, T01, T04	
544	U	3	5	3	1,000	T	S01, S02, T01, T04	
545	U	3	5	9	1,000	T	S01, S02, T01, T04	
546	U	3	6	4	1,000	T	S01, S02, T01, T04	
547	U	3	6	7	1,000	T	S01, S02, T01, T04	

548	U	3	7	2	1,000	T	S01, S02, T01, T04	
549	U	3	7	3	1,000	T	S01, S02, T01, T04	
550	U	3	8	7	1,000	T	S01, S02, T01, T04	
551	U	3	8	9	1,000	T	S01, S02, T01, T04	
552	U	3	9	4	1,000	T	S01, S02, T01, T04	
553	U	3	9	5	1,000	T	S01, S02, T01, T04	
554	U	4	0	4	1,000	T	S01, S02, T01, T04	
555	U	4	0	8	1,000	T	S01, S02, T01, T04	
556	U	4	0	9	1,000	T	S01, S02, T01, T04	
557	U	4	1	0	1,000	T	S01, S02, T01, T04	
558	U	4	1	1	1,000	T	S01, S02, T01, T04	

1 General Facility Description

1.1 Clean Earth of Alabama, Inc. (CEA) is located at 402 Webster Chapel Road in Glencoe, Alabama. The facility receives hazardous wastes in bulk and containers by means of vans, tankers, roll offs and dumps. No hazardous waste is received by rail or water at the facility. No disposal of any type occurs on site.

1.1.1 The active portion of facility is on private property that consists of an area approximately 7 acres in size. The surrounding area consists of light industrial and residential housing within a 1000-foot area around the facility.

1.1.2 There are two water bodies located within 1000 feet of the facility; 1) Little Cove Creek 2) Quarry

1.1.3 Topography: See topographic map in Appendix A.

*1.1.3.1 100-year Flood Plain: CEA is not in a 100-year flood plain. See Flood Plain Map in **A**ppendix A.*

1.2 Storm water, Runoff, and Sewage Control:

1.2.1 The facility operates under an NPDES storm water discharge permit. A Best Management Plan and Spill Prevention and Control Plan are maintained in accordance with this permit. All storm water that falls onto the facility is funneled to a storm water discharge point **(DSN001)** before being released. This discharge point is capable of holding approximately 10,000 gallons of storm water and is equipped with a valve that is capable of being opened and closed. This valve remains closed and is only opened to discharge storm water after the water to be discharged is inspected for obvious signs of oil sheen or other contamination. As part of the NPDES storm water permit, samples are collected semi-annually and sent off site to an independent lab for analysis. Storm water and ground water flows generally in a west/southwesterly direction. Sewage is handled by onsite septic tanks.

1.3 Access Control:

1.3.1 The facility is surrounded by a chain link fence with barbed wire. There are two gates that are used to control access to the facility. During normal working hours plant personnel and/or security personnel control access to the facility.

1.4 Traffic Patterns:

1.4.1 There is one major **road** (Webster Chapel) that allows access to the facility. Traffic patterns are rural in nature. Traffic on facility premises is accomplished by private roads leading to and from the main road. See the Facility Satellite photo in Appendix A.

2 Waste Analysis Plan

2.1 General Description of Waste

CEA processes industrial wastes including, but not limited to, paints, lacquers, thinners, waste petroleum products, petroleum by-products, aerosols, inks, resins, adhesives, petroleum distillates, solvents, such as, halogenated and non-halogenated, organic chemicals and by-products, various alcohols, waste contaminated materials and residues in its waste storage, blending and processing facility.

Waste materials may be delivered to the facility in bulk and/or various containers sizes, and either processed, blended and consolidated and/or stored in various containers sizes or tanks on-site or processed and shipped off-site to an approved, permitted disposal facility.

Most, but not all, of the wastes handled at the CEA facility are wastes designated as characteristic or listed as hazardous by U.S. EPA and the State of Alabama. However, CEA also receives used oil and other non-hazardous material.

2.2 Hazardous Characteristics

Hazardous wastes listed by the U.S. Environmental Protection Agency under its regulations at 40 CFR Part 261 (ADEM Rule 335-14-2) and wastes exhibiting hazardous characteristics also described in those regulations may be accepted at CEA depending upon their suitability for the facility's operations and compatibility with materials with which they will be stored, blended and/or processed. The wastes accepted at CEA are listed in the Part A Application and are identified by EPA Hazardous Waste Codes and associated hazard.

Wastes exhibiting the characteristics of reactivity, D003, may be accepted only for storage and shipped off-site to an approved, permitted facility for final disposal. EPA listed wastes which contain dioxins, furans, such as, F020-F023, F026- F027, are not accepted for processing or fuel blending purposes. However, these wastes may be accepted for storage and transfer from CEA to an approved, permitted disposal facility. *Note: that these wastes will not be placed in storage tanks.

2.3 Basis for Hazardous Designation

The typical components of hazardous waste accepted at CEA are spent solvents or other industrial wastes which are characteristic or listed wastes.

These wastes are further described by one or more toxicity characteristics. Many industrial wastes and waste petroleum products may contain significant heat value, i.e. BTU'S, but are not listed wastes for ignitability. Such wastes may contain sufficient concentrations of certain metals or organic components to exhibit the characteristics of toxicity. CEA may accept for storage, blending, Consolidated and processing any of these wastes. The determination of whether a waste is suitable for CEA's use is generally more dependent on the physical and chemical characteristics of the waste.

CEA also receives wastes in the form of debris, RCRA hazardous non-infectious medical wastes, metals bearing waste, plating waste, and solids for processing. Processing protocol for

these types of waste may consist of any of, or combination of, but not limited to, the following; storing, pumping, blending, bulking, consolidating, shredding, compaction, or separation. Once processed these wastes are then transferred off-site for final disposal to an approved, disposal facility.

CEA also receives wastes in the form of aerosol cans and other containers. Most of the aerosol containers to be received at the facility are regulated and classified as ignitable (or flammable) compressed gas as defined in 40 CFR Part 261.21 and 49 CFR 173.300. Non-flammable aerosol containers are also accepted at the facility (e.g., cans with compressed air, such as, nitrogen). Cylinders are also accepted at the facility, such as, but not limited to: oxygen, nitrogen, helium, propane, Freon**,** etc. and are transferred off-site for final disposal to an approved, permitted facility or recycled.

2.4 Laboratory Documentation

New waste streams undergo a prequalification review as indicated in Section 2.6.1. Analytical data, if required, may be provided by the generator or by CEA. Other laboratories may also be used as necessary. Samples of wastes delivered to the CEA facility are analyzed per Section 2.10, shipping papers and/or manifests are reviewed before acceptance into the facility. Any problems with waste identification and composition are resolved with the generator or the waste is not accepted into the facility. Samples for analysis from incoming shipments are generally performed at the laboratory on-site. Other laboratories may also be used as necessary.

2.5 Waste Analysis Plan

The waste analysis plan sets out the criteria, rationale and procedures that will be followed at CEA for the sampling, analysis and evaluation of wastes received, stored in tanks, consolidated, blended and/or processed at the facility. It outlines the procedures and analytical methods used to obtain the chemical and physical characteristics of the wastes to evaluate them for safe storage and handling by the facility.

2.6 Waste Qualification Protocol, Parameters and Rationale

It is CEA's policy not to process any waste until the analytical results are obtained and any discrepancies resolved, except for the following; aerosols, debris, Loose pack paint, Lab-packs or RCRA non-infectious medical waste.

2.6.1 Prequalification Procedures and Analysis

CEA requires a written waste profile of the waste material from the generator prior to the waste being shipped to the facility. An example of a Waste Profile Sheet, shown in Figure 1-1, is reviewed biennially or whenever the waste stream changes. The generator may use their version of a Waste Profile Sheet if all pertinent information is included on the form. The prequalification procedure is designed to assure that a comprehensive chemical profile is provided for each waste including, e.g., volatile and semi-volatile chemicals, metals, pesticides and poly-aromatic hydrocarbons. The information can be based on generator knowledge, generator certification, SDS or testing. Based on the information contained on the Profile Sheet, CEA will determine whether the waste can be managed on site.

Note: non-substantive changes to these exemplary documents may be made so long as all required information is contained in the documents.

As part of this prequalification procedure, representative samples of each waste stream are either obtained from the generator or from the first shipment of material at the facility. These are required to be analyzed and the results are compared to the waste profile.

The following prequalification fingerprint analysis will be performed as necessary.

1. BTU Value*
2. Chlorides*
3. pH**
4. Moisture Content***
5. Specific Gravity***
6. Compatibility*
7. Flash Point

* This analysis will be performed only on materials to be blended into fuel for reuse.

** This analysis will **not** be performed on solvent matrix materials, e.g., organic solvent waste or oil wastes, or water insoluble solid matrix wastes.

*** This analysis will be performed only on liquid materials.

2.7 Discrepancies

The criteria used for identifying discrepancies will include 1) differences in physical state 2) materials or compounds present which were not listed on the manifest or waste profile and 3) materials or compounds present but outside the expected range.

If discrepancies are noted, CEA will contact the generator and describe the discrepancy. The generator can revise the profile. If the profile is revised, the generator may fax or email the corrected signed document(s).

2.8 In-Coming Bulk Shipment Procedures and Analysis

In addition to the prequalification procedures, representative samples from the waste shipment are analyzed upon arrival at CEA and the results are compared to the waste profile. The following fingerprint analysis will be performed on incoming bulk shipments as discussed below:

1. BTU Value*
2. Chlorides*
3. pH**
4. Moisture Content***
5. Specific Gravity***
6. Compatibility*
7. GC Scan (PCB's)
8. Flash Point

* This analysis will be performed only on materials to be blended into fuel for reuse.

** This analysis will not be performed on solvent matrix materials, e.g., organic solvent wastes or oil wastes, or water insoluble solid matrix wastes.

*** This analysis will be performed only on liquid materials.

If discrepancies are noted CEA will contact the generator within 24 hours and describe the discrepancy. The generator is allowed 24 hours to 1) revise the profile; 2) correct the manifest; or 3) make arrangements to remove the waste. If revisions are necessary, the generator may fax or email the signed corrected document(s).

2.9 In-Coming Container Shipment Procedures and Analysis

In addition to the prequalification procedures, representative samples from incoming container shipments are analyzed upon arrival at CEA and the results are compared to the waste profile sheet. The following waste streams are exempt from sampling: aerosols, loose pack paint, Lab-packs, RCRA hazardous (non-infectious) medical waste (i.e. pharmaceuticals), cylinders, RCRA Reactive waste (D003), D.O.T. hazard classes 4.2 Spontaneously combustible and 4.3 Water Reactive, Poison Inhalation Hazards as defined by D.O.T. under hazard classes and divisions 2.3 & 6.1, Hydrofluoric acid at any other waste stream that management deem unsafe to sample.

The following prequalification fingerprint analysis will be performed as discussed below:

1. BTU Value*
2. Chlorides*
3. pH**
4. Moisture Content***
5. Specific Gravity***
6. Compatibility*
7. GC Scan **(PCB's)**
8. Flash point

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* This analysis will be performed only on materials to be blended into fuel for reuse.

** This analysis will not be performed on solvent matrix material, e.g., organic solvent wastes or oil wastes, or water insoluble solid matrix wastes.

*** This analysis will be performed only on liquid materials.

Trucks carrying containers will proceed to the container unloading dock where plant personnel will visually inspect the load, confirm the number of containers, and, on the basis of the documentation and waste identification number, give permission for the load to be unloaded onto the container dock area. During the unloading process, all containers will be inspected, and any container not considered to be in a satisfactory condition will be placed safely in an over pack drum or other suitable container. Each consignment of containers will be kept separate until approved. When the truck is unloaded, and the manifest signed, the truck may leave the plant.

Containers being unloaded may be placed on sampling floor or the dock, or temporarily in storage, for sampling and verification by fingerprint testing. If it is found that the truckload or a group of containers within a truckload need to be placed in storage for a time before

processing, then these containers may be placed in the storage area for up to 72 hours prior to acceptance while undergoing fingerprint testing. Each container or group of containers, which have been sampled, will be specially marked in such a manner to indicate the arrival date and also so as to be readily apparent to plant personnel that the containers have not been sampled. For sampling, all containers in a shipment will be opened and sampled. A composite sample will be created from the individual samples in accordance with the written procedure. The samples will be taken to the laboratory for analysis.

The containers will travel by forklift truck to the appropriate storage area. If it is found that a container or group of containers does not conform to the profile sheet and upon review it is determined that the waste is unsuitable for processing, then the containers will be placed into storage and put on "hold" until a resolution has been reached.

If discrepancies are noted CEA will contact the generator within 24 hours and described the discrepancy. The generator is allowed 15 Days to 1) revise the profile; 2) correct the manifest; or 3) make arrangements to remove the waste. If revisions are necessary, the generator may fax the signed corrected document(s).

2.10 Parameters to be analyzed

A general discussion of the parameters to be analyzed follows:

pH

pH is a very important indicator since unwanted reactions may occur when wastes of widely different pHs are mixed.

Specific Gravity

Specific gravity is a basic indicator of waste characteristics and, as such, is used to ensure that a waste shipment matches the waste profile. Specific gravity is performed as both part of the pre-qualification and incoming shipment acceptance testing.

Flash Point

Flash point is an indicator for proper handling and storage of liquid wastes.

BTU/Chlorides/Moisture Content

These help determine the waste's suitability as a fuel.

GC Scan (PCB's)

The facility is not requesting a permit to process wastes whose PCB content is such that the waste is legally a PCB waste. Thus, it is important to sample and analyze for PCB content. However, these wastes may be accepted for temporary storage and transfer from CEA.

Compatibility

A compatibility test is conducted for all liquid and sludge waste received at the CEA facility for storage, blending, consolidating or processing. A sample from each load received is tested to determine if the material reacts with other materials already in the system.

For this test, a container is partially filled with a sample of representative material from a storage tank. A sample from the load being received is then added to the container and capped. The mixture is shaken and observed to determine if the samples react chemically.

Failure of the compatibility test does not necessary imply that the waste is out of specification. If a waste is found to be incompatible the decision will be made to either (1) reject the waste, (2) accept the waste and retest it using a different solvent matrix that will not result in a reaction that will interfere with processing or (3) ship it off-site to a permitted facility that could handle this material.

2.11 Test Methods

Table 1-1 lists the test methods utilized to measure each parameter at the CEA laboratory. Because of the varied nature of the waste materials it may be desirable or necessary to modify or adapt the standard methods or the sample preparation used prior to analysis, or to use entirely alternative methods. Such modifications are permissible under this plan, provided that the modified or alternative procedures produce accurate and reliable results. However, test methods normally conform to SW-846 methods or other acceptable methods.

Initial testing for qualifying a new waste stream is generally performed by CEA, independent laboratories may also be used. Analyses of samples collected from incoming trucks for acceptance at CEA are generally performed in laboratories at the facility. If the facility is unable to analyze a sample in a timely manner, an alternate laboratory will be utilized.

TABLE 1-1
TEST METHODS FOR ANALYSIS *

Parameters	**Test Methods**	**Reference**
Specific Gravity	Standard Hydrometer	
Flash Point	Closed-cup Methods	USEPA SW-846, Method 1010
pH	pH Measurement or Litmus Paper	USEPA SW-846, Method 9040, 9041, 9045
Heat of Combustion	Bomb Calorimeter	ASTM D-240
Moisture Content	Karl Fisher	ASTM D-2361, D-805, E-203
Chloride	Silver Nitrate Titration	ASTM D-808, and 512B

Polychlorinated Biphenyls	Gas Chromatography	Test Method for Evaluating Solid Waste (EPA SW-846, Method 8082)
Toxicity Characteristic Leaching Procedure	Eight RCRA Hazardous Metals ONLY.	USEPA SW-846 1311

The above methods may be modified provided the modified method is sufficiently accurate and reliable for waste acceptance procedures.

2.12 Sampling Methods

2.12.1 Bulk Shipments

Sampling of tanker trucks is accomplished using a Coliwasa sampler. The sampling devices proposed for use by the facility for bulk shipments and containers go all the way to the bottom of the vessels so that accumulated sludge will be included in the sample matrix. Storage tanks may have agitators on them to reduce the possibility of sludge accumulation.

2.12.2 Containers

Samples from drums, e.g., 55-gallon drums and smaller containers are taken with a tube or pipe similar to a Coliwasa sampler. The pipe is made of non-sparking material such as copper or plastic and has an inside diameter of about ½" to 5/8". This provides a much sturdier tool for sampling and has proven to be an adequate sampling device even under adverse sampling conditions.

2.12.3 Storage Tanks

Storage tanks may be sampled by different methods. A sampling device may be used for sampling tanks with depths of up to 30 feet or more. A Coliwasa sampler may be used if practical. Also, a grab sample may be taken from a recirculating line. Samples are typically collected from a tap located on the solvent tank recirculating line. The tank(s) are agitated, and solvents are recirculated for a period of approximately thirty minutes. A Coliwasa sampler may be used if practical. Also, a grab sample may be taken from a recirculating line, or an equivalent method.

2.12.4 Solids

Solids that are non-penetrable may be sampled with an auger, spatula or by chipping, scraping, or by tearing or breaking off a piece.

2.12.5 Aerosol Cans and Cylinders

Currently CEA receives shipments of aerosols in non-bulk (i.e. 55 gal. drum and smaller) and intermediate bulk containers (i.e. cubic yard boxes). Non-bulk containers of aerosols may be consolidated into cubic yard boxes prior to shipment off site for final disposal at an approved recycling facility. Again, no samples of the liquids or propellant gases from aerosol cans or cylinders will be obtained.

2.13 Frequency of Analysis

Sampling and testing prior to storage, blending, or processing. All new waste streams are prequalified. Waste streams in current use are reviewed biennially (24 months) at which time generators are required to provide a recertification of their waste profile.

Each incoming shipment of bulk waste is sampled to verify the identity of the waste. Containers are sampled according to ADEM Administrative Rule 335-14-5-.02 **(**c) and (d) in lots of 10 or less with the representative samples from each container being composited into 1 sample. Composite samples will be taken only from containers containing material from the same waste stream of the same generator.

2.14 Additional Waste Analysis Requirements Pertaining to Land Disposal Restrictions

The facility does not treat or dispose of any hazardous waste in land disposal units at the facility. Wastes are stored in tanks or containers, blended, consolidated or processed in tanks or containers for off-site shipment to approved, permitted facilities.

Waste generated at the facility requiring shipment off-site will require knowledge of the waste generating process or chemical analysis to allow the facility to make proper notification of any land disposal restrictions to the receiving facility. The applicable testing, tracking and recordkeeping requirements pertaining to the land disposal restrictions in 40 CFR 268.7 will be followed for applicable off-site shipments.

3 Preparedness, Prevention, and Contingency Plan

3.1 Emergency Contact Information

This section provides all emergency contact and response/reporting information for this facility.

TABLE 1
EMERGENCY COORDINATORS CONTACT INFORMATION

Name/Position	Office Address	Phone Numbers
Primary Emergency Coordinator John Black General Manager	402 Webster Chapel Road Glencoe, AL 35905	713-538-4341 (C) 256-492-8340 (O)
1st Alternate Michael Wilson Plant Manager	402 Webster Chapel Road Glencoe, AL 35905	256-558-6185 (C) 256-492-8340 (O)
2nd Alternate Don Johnson Assistant Plant Manager	402 Webster Chapel Road Glencoe, AL 35905	256-613-6303 (C) 256-438-5376 (H) 256-492-8340 (O)
3rd Alternate Bryan Jones Area EH&S Manager	402 Webster Chapel Road Glencoe, AL 35905	205-405-3042 (C) 256-492-8340 (O)
See SECTION 4 for description and requirements for emergency coordinators.		

TABLE 2 EMERGENCY NOTIFICATION PHONE LIST: COMMUNITY		
Entity	**Name**	**Phone Numbers**
Fire Department (Primary)	Glencoe Volunteer Fire Department	911 for Emergencies 1-256-492-1433
(Secondary) Fire Department	Gadsden Fire Department	911 for Emergencies 1-256-549-4500
Police	Glencoe Police Department	911 for Emergencies 1-256-492-4124
Hospitals	Gadsden Regional Medical Center Riverview Medical Center	1-256-494-4965 1-256-543-5838
EMS/Ambulance	Rural Metro Ambulance	911 1-256-442-3648
Response Contractor – for response to releases that occur during ***or*** after business hours	Safeway Environmental	1-256-492-3704
	Verisk (3E)	800-451-8346
Water	Glencoe Water Works	1-256-492-1020
Power – Electric	Alabama Power	1-888-430-5787
Natural Gas	ALAGASCO	1-800-292-4008

3.2 Other Numbers and Links for Reporting Oil Spills & Hazardous Substance Releases

1. National Response Center (NRC) - 1-800-424-8802
2. Alabama Dept. Of Public Safety (24 Hours) 1-334-261-4378
3. (LEPC) Local Emergency Planning Committee 256-549-4575
4. Alabama Emergency Response Commission 1-800-843-0699
5. EPA Region 4 in Atlanta Emergency Response | (404)-562-8700
6. United States Coast Guard – Mobile | (251) 441-5286
7. ADEM Montgomery Branch Field Office | (334)-260-2700
8. ADEM Birmingham Branch Field Office | (205)-942-6168
   - Aaron Peters, 1-334-394-4310 dapeters@adem.alabama.gov
9. ADEM - Central Office | (334)-271-7700
10. ADEM Office of Emergency Response (General Info. only) | (334)-260-2717
11. CHEMTREC 1-800-424-9300
12. Coastal Section Office | (251)-304-1176
13. Alabama State Warning Point - 1-800-843-0699

3.3 Purpose and Implementation

This Contingency Plan (the "Plan") is designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the CEA, Glencoe, Alabama facility (the "Facility"). This Contingency Plan describes the actions Facility personnel will take to comply with Alabama Administrative Code Rule 335-14-5-.04(2) and (7) in response to fires, explosions, or any unpermitted sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the Facility. The provisions of this Plan will be carried out immediately whenever there is a fire, explosion or release of

hazardous waste or hazardous waste constituents which could threaten human health or the environment.

The Plan also describes arrangements agreed to by local law enforcement, fire departments, hospitals, contractors and ADEM Field Operations Division and local emergency response teams to coordinate emergency services, pursuant to Alabama Administrative Code Rule 335-14-5-.03(8).

3.4 General Information

CEA operates a Facility located at 402 Webster Chapel Road in Etowah County, Glencoe, Alabama 35905 (the "Facility") where hazardous wastes are stored in tanks and containers. The Facility is located on a total of 7.3 acres, with 4.6 acres being the actual area that contains the permitted Treatment, Storage and Disposal Facility (TSDF). The TSDF is secured with an 8-foot perimeter chain link fence and locking gates that are monitored. The fenced TSDF area includes the following buildings and structures:

1. An administrative and office building;
2. A breakroom building;
3. Building #1: drum storage building and covered containment pad/loading dock (a permitted area)
4. Building #2: (Quonset Hut) building (a permitted area);
5. Building #4: A solids waste processing building (a permitted area);
6. Building #3: a bulk storage covered containment area (a permitted area);
7. A covered aboveground storage tank (AST) farm and loading dock area (a permitted area); and
8. Miscellaneous hydraulic air compressor, fire suppression, electrical and safety supply sheds.

An earthen berm has been installed along the eastern and southern fence lines to aid with site drainage and runoff control. Just outside the permitted and fenced area to the south is a non-regulated carbon-black processing shed and pad.

The Facility accepts a variety of hazardous and non-hazardous industrial wastes, pharmaceutical wastes, universal wastes and e-wastes. The majority of wastes that are received at the Facility are blended into fuel and shipped off-site to be burned in kilns, boilers, and industrial furnaces. Other wastes are accepted for storage and shipment off-site to permitted facilities.

The Facility consists of storage and blending tanks, container storage and processing areas, tanker loading/unloading pad, solids processing area, and an on-site laboratory. The Facility has bulk storage capacity of 90,000 gallons divided amongst six (6)-15,000 gallon above ground storage tanks (ASTs) and 190,497 gallons in container storage such as various sized totes and drums, etc. Wastes are typically transported to the Facility in bulk tank trucks with a capacity of up to 6,000 gallons and vans carrying various size containers.

Incoming bulk fuel wastes are pumped directly into the ASTs. Containerized fuel wastes are processed through fuel blending or by other Facility processes such as bulking. Waste may be pumped to or from the holding tanks either directly from tankers or other containers as needed.

The Facility has the following active utilities:

- Natural Gas
- Electrical
- Water
- Internet/Cable
- Telephone

The only toilet facilities are in the administrative, laboratory breakroom buildings. These buildings are

attached to a septic tank waste disposal system.

The Facility currently operates one (1) primary work shift between 7 AM to 3:30 PM. A second work shift operates between 2:30 PM to 11:00 PM. The site always has one security guard on the premises 24/7, 365 days a year.

3.5 Emergency Coordinators

At all times, there must be at least one employee either on the Facility premises or on call (i.e., available to respond to an emergency by reaching the Facility within a short period of time) with the responsibility for coordinating all emergency response measures. That person is known as the Emergency Coordinator.

The Emergency Coordinator must be available on a 24-hour basis and trained in the responsibilities of the position. The Emergency Coordinator will be thoroughly familiar with all aspects of the Facility's Contingency Plan, all operations and activities at the Facility, the location and characteristics of wastes handled, the location of all records within the Facility and the Facility layout. In addition, the Emergency Coordinator and alternates have the authority to commit the resources needed to carry out the Contingency Plan.

Emergency Equipment

The following emergency response equipment is available at the Facility:

INVENTORY OF EMERGENCY RESPONSE EQUIPMENT

① Throughout Facility	⑦ Drum Storage Building
② Office Building	⑧ Stabilization Building
③ Break Room Building	⑨ Bulk Storage
④ Emergency Storage Shed	⑩ Solids Buildings
⑤ Laboratory Building	⑪ Nonregulated Operations Pad
⑥ AST Tank Farm	⑫ Other:

CATEGORY/ITEM	LOCATION(S) (Insert #'S from above to all that apply)	CAPABILITY/USE
COMMUNICATIONS		
Telephones	1	Land line service. For use in contacting emergency responders and employees.
Portable Radios	1	Used for onsite inter-communication between staff. Hand held and body mounted.
Air Horns	1	Used to alert employees of an emergency or evacuation order.
PERSONAL PROTECTIVE EQUIPMENT		
Air-Purifying Respirators	4	Variety of forms, see corporate respirtory protection program for selection criteria.
Full-face (APR) Respirators	Individually Issued	Individual inssued to employees. Air purifying. Adequate reserves on hand. Variety of forms, see corporate respirtory protection program for selection criteria.
Half-face (APR) Respirators	Individually Issued	Individual inssued to employees. Air purifying. Adequate reserves on hand. Variety of forms, see corporate respirtory protection program for selection criteria.
Repirator Cartridges:		
Multi-gas Organic Vapor Acid Gas/P100	Individually Issued (Stored PPE Closet Electrical Room)	Protects against organic vapors - see corporate respiratory protection program for selection details.
Other:		
Other:		
Particulate Protective Suits	4	Protects against small size hazardous particles, such as dust, lead, asbestos, and mold.
Chemical Resistant Suits	4	Protects against splash hazard from certain hazardous checmical types. Need to check compatability of suit with waste.
Rain Gear	4	Protects against splash hazard from certain hazardous checmical types. Need to check compatability of suit with waste.
Booties	4	Protects against splash hazard from certain hazardous checmical types. Need to check compatability of suit with waste.
Splash Shield	4	Protects face from splashes.
Goggles	4	Protects eyes.
Safety Glasses	4	Protects eyes.
Hearing Protection	4	Protects ears/hearing.
Chemical Resistant Gloves:	4	
Nitrile	4 work station area PPE suppy room	Protect when working with oils, greases, acids, caustics and alcohols. Not recommended for oxidizing agents, aromatic solvents, ketones and acetates.
PVC	4	Versatile heavy duty work glove that protects workers from chemicals, punctures, cuts and abrasion.
Cloth Glove Liners	4	Inner cloth glove liners.
Decontamination Supplies	4	Wash brushes, alquinox, alcohol, buckets to clean off emergency personnel.
Duct Tape	1, 4	Seal PPE, multi-purpose.
EMERGENCY RESPONSE EQUIPMENT		
Backhoe	12 Other: Various Locations Onsite	Mechanical tool for excavating and recovering large quanities of released waste.
Hand shovels, rakes, hoes, & brooms	4, 12 Other: Various Locations Onsite	Hand tools for waste capture.
Explosion Proof Pumps	6, 12 Other: Various Locations Onsite	Pumps that are complient with NFPA standards for transferring or pumping Class 1 and 2 flammable liquids.

INVENTORY OF EMERGENCY RESPONSE EQUIPMENT

① Throughout Facility	⑦ Drum Storage Building
② Office Building	⑧ Stabilization Building
③ Break Room Building	⑨ Bulk Storage
④ Emergency Storage Shed	⑩ Solids Buildings
⑤ Laboratory Building	⑪ Nonregulated Operations Pad
⑥ AST Tank Farm	⑫ Other:

CATEGORY/ITEM	LOCATION(S) (Insert #'S from above to all that apply)	CAPABILITY/USE
Pnuematic Pumps	6, 12 Other: Various Locations Onsite	Pnuematic diaphragm pump. Can be used for non-flammable and flammable liquids. Check compatability of pump and bladder to waste and degree of flammablility of material.
Sump/Electric Pump	12 Other: (TBD)	Pump non-flammable liquids.
Centrifual Pump	4	Typically gas powered pumps designed to move large volumes of non-flammable liquids.
Hoses	6, 12 Other: Various Locations Onsite	Attachments to pumps.
Clamps & Fittings	12 Other: Various Locations Onsite	Misc. fittings for piping and hoses
Compressor	8, 12 Other: Various Locations Onsite	Air Supply for pnuematic equipment
Generator/Extension Cords	12 Other: Various Locations Onsite	In-field electrical power supply.
Forklift	12 Other: Various Locations Onsite	Removing pallets, drums and other objects.
Absorbent Materials:		
Pads	4	Spill containment/clean-up.
Booms	4	Spill containment/clean-up.
Particulate	4	Spill containment/clean-up.
Wipes	4	Spill containment/clean-up.
Soda Ash	8	Spill containment/clean-up.
Saw Dust	4, 7, 8, 9, 10, 11	Spill containment/clean-up.
Drums	12 Other: Various Locations Onsite	Waste capture/storage.
Totes	12 Other: Various Locations Onsite	Waste capture/storage.
Buckets	12 Other: Various Locations Onsite	Waste capture/storage.
Pre-assembled Spill Response Kits	4, 7, 8, 9, 10, 11	Chemical resistance gloves (2 pair), goggles (2), Tyvek coveralls (2), oil absorb granules, absorbent pads (25), absorbent socks (4), absorbent pillows (2), disposable bags and ties (3), roll of caution tape, plastic shovel, 85 gallon container. Kit is capable of containing spills up to 26.5 gallons. Materials contained in spill kit can be used to contain spill, to prevent it from reaching a waterway or from leaving the site.
Storm Drain Covers	4	Cover drains to prevent impacted surface water from migrating within the stormwater system.
Polyethylene Sheeting (rolls)	1	Building containments, covering wastes, protective layer, etc.
FIRE FIGHTING SUPPLIES		
Foam Station (fixed)	12 Other: 2 Central Locations Onsite	Firefighting - Class B foams for flammable or combustible liquids.
ABC Fire Extinguisher (portable)	1	Firefighting - Class A (combustible), Class B (flammable or combustible liquids) and Class C (electrical) fires.
Dolly Mounted ABC Fire Ext. w/ Hose	8	
Class D Fire Extinguisher	8, 10	Extinguishing Class D (combustible metal) fires.
FIRST AID SUPPLIES		
First Aid Kit	1	Equipment for treating minor medical problems such as lacerations, punctures, abrasions, sprains, strains, 1st and 2nd degree burns.
Automatic Defibrillator	5	Treating sudden cardiac arrest.
Stretcher	12 Other: (TBD)	Transport injured person.
Eye Wash Station	4, 7, 8, 9, 10, 11	Wash eyes after being splashed.
Showers	4, 7, 8, 9, 10, 11	Wash body after being splashed.
NA = Not applicable or currently onsite.	TBD = To Be Determined/Unknown whether onsite at this time.	

3.6 Evacuation Plan

In the event that the Emergency Coordinator or Alternate determines that the evacuation of Facility personnel is necessary, the need for evacuation will be signaled through the use of an emergency air horn. All employees, contractors and visitors will evacuate the Facility using predetermined routes as depicted on DRAWING 2 and proceed to the Assembly (Rally) Point. At the Assembly Point, supervisors will note the presence of their employees and any contractors who were working in their area. The Emergency Coordinator

or Alternate (or designee) will account for any visitors who were present at the Facility.

General evacuation recommendations and procedures are also listed on DRAWING 2, but for a full account of CEA's evacuation procedures and routes please consult the personnel training manual. Evacuation routes are also posted throughout the Facility.

3.7 Copies of the Contingency Plan

A copy of the Contingency Plan and all revisions to the plan will be maintained at the Facility and submitted to local law enforcement, fire departments, hospitals, and the Alabama Department of Environmental Management (ADEM), Field Operations Division as well as any local emergency response teams that may be called upon to provide emergency services. Documentation of compliance with this requirement will be maintained at the Facility.

3.8 Amendment of the Contingency Plan

The Contingency Plan will be reviewed, and immediately amended if necessary, whenever

- The Facility's permit is revised;
- The Plan fails in an emergency;
- The Facility changes, in its design, construction, operation, maintenance, or other circumstances, in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- The list of emergency coordinators changes; or
- The list or location of emergency equipment changes.

All revisions to the plan will be provided to ADEM and/or all other parties that are typically provided copies of the plan.

3.9 Emergency Procedures

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator or Alternate will immediately activate internal Facility alarms or communication systems, where applicable, to notify all Facility personnel. Emergency notification systems include two-way radios, voice, or air horn. In addition, the Emergency Coordinator will notify appropriate State of Alabama or local agencies with designated response roles if their help is needed.

The Facility uses a color-coded system, as shown below, to identify the type of emergency:

EMERGENCY RESPONSE CODES

YELLOW (INJURY)
BLUE (SPILL)
RED (FIRE)

YELLOW (INJURY) is used to denote when an injury has occurred onsite. There are two types of injuries: (1) a minor injury where the injured party(s) can be adequately addressed by onsite personnel using the Facility's first aid supplies; and (2) a serious injury where the injured party(s) requires immediate professional medical attention either onsite and/or requires transport to an offsite medical facility for care. **IN ALL CASES, BEFORE A RESPONDER(S) ATTEMPTS TO PROVIDE AID TO AN INJURED PARTY THEY MUST SURVEY THE SCENE TO MAKE SURE IT IS SAFE FOR THEM TO PROVIDE ASSISTANCE. RESPONDING TO AN INJURY, REGARDLESS OF THE DEGREE OR URGENCY,**

BLUE (SPILL) is used to denote a spill of a hazardous material. There are two types of spills: (1) a minor and/or contained spill that occurs within a structure that can control and prevent any of the materials from migrating to other areas and/or impacting the environment; and (2) is an uncontained spill where materials can migrate in an uncontrolled manner and potentially impact the environment. Uncontained spills are dynamic and pose unique risks and concerns and must be addressed based on real-time situations and site conditions. When liquids are released to an uncontained area the liquid will flow in a downgradient direction. Predicting where the material may migrate based on its viscosity and site terrain so that barriers or temporary containments can be made to capture the migrating liquid is recommended. Preferably, response actions should attempt to keep the material onsite, if possible. Amongst many options, the use of absorbent materials (booms, pads, wipes, etc.), creating ditches and pits (lined if possible) or diverting the materials into an existing containment structure are some of the things that might be consider to address and shorten the migration route of an uncontained spill. Ultimately, the goal of the responder should be to stop the migration of the material as quickly as possible in a manner that allows for the largest volume of material to be subsequently recovered. Special attention should be paid to minimizing the risk the spill may pose to human health and environment as well as ensuring that the material does not pose a physical hazard to the site structures or other areas.

RED (FIRE) is used to denote a fire or explosion. There are two types of fires/explosions: (1) an incipient fire that is small or in the initial stages of starting (or small chemical reaction/explosion) that can be put out by appropriately trained Facility personnel using the onsite fire extinguishing resources; and (2) a serious fire/explosion that will or already has exceeded the firefighting/response capabilities available onsite. A serious fire or explosion of this nature requires immediate outside professional firefighting resources and will likely require the evacuation of the Facility. A generalized response flow diagram for each of these emergencies is provided in APPENDIX A.

Whenever there is a spill/release, fire, or explosion, the Emergency Coordinator or Alternate will immediately identify the character, exact source, amount, and areal extent of any released materials or hazardous substances. This may be done by observation or review of Facility records or manifests, and, if necessary, by chemical analysis.

Concurrently, the Emergency Coordinator or Alternate will assess possible hazards (substances or conditions present) to human health or the environment that may result from the release, fire, or explosion. That assessment will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions). Such information will be provided to the appropriate Federal, State and local authorities as necessary to protect human health and the environment.

The following sections describe the prioritized response actions to be carried out by Facility personnel under this response plan to ensure the safety of the Facility and its employees and to mitigate or prevent small, medium and worst-case discharges.

3.9.1 Discovery

If an employee discovers a spill, fire, or other emergency, he or she will notify the Emergency Coordinator or Alternate by telephone, portable radio or other direct means and report the following:

1. Nature of emergency (i.e. fire or spill);
2. Location of emergency;
3. Size and extent of emergency;
4. Materials involved;

5. Injury to personnel;
6. The name of the person providing notice of the emergency; and,
7. The person's present location.

Telephones are located at clearly visible locations within the administrative office and operational buildings only. Notification can be made via phones as needed.
The Emergency Coordinator or Alternate will determine the proper response in accordance with the control procedures provided in this Contingency Plan.

3.9.2 Initial Response

In the event of injury, in-house, trained personnel will administer first aid as necessary. If the injury is beyond the capabilities of first aiders, the Emergency Coordinator or Alternate (or designee) will contact the ambulance (911) and the hospital, as appropriate. In the event of an after hour's emergency, the onsite supervisor will be responsible for contacting the ambulance and hospital in the event of injuries.

Upon being notified of the emergency, the Emergency Coordinator or Alternate (or designee) will assess the situation to determine the following:

1. Hazards involved including the character, exact source, amount, and areal extent of any released materials or hazardous substances;
2. Magnitude of the problem;
3. 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;
4. Resources threatened; and,
5. Exclusion zone need or if evacuation of the Facility is required.

The Emergency Coordinator will then determine the actions to be taken using the procedural flow diagrams provided in APPENDIX A.

If the emergency involves the release of a hazardous material, while awaiting arrival of the Emergency Coordinator or his designee, plant personnel shall commence containment activities immediately, using all available trained manpower and materials on-hand. **All containment activities will be conducted at a safe distance from the release area and will consist of only those activities for which the employee has received training and can be safely administered.** Immediate containment of the spill shall include blocking of adjacent drains, constructing dikes, etc., using all available containment materials on-hand. The location of available emergency equipment is provided in SECTION 5 of this Contingency Plan.

If the emergency involves an incipient (i.e., just starting/small) fire, and the employee can safely do so while allowing a safe means of egress from the building, the employee may fight the fire using the appropriate handheld fire extinguisher. **All firefighting activities will be limited to incipient fires and will consist of only those activities for which the employee has received training and can be safely administered.** The location of available emergency equipment is provided in SECTION 5 of this Contingency Plan as well as on DRAWING 1.

CEA employees will not engage in emergency response operations other than responding to minor releases or hazardous materials, containment of larger releases of hazardous materials or responding to incipient fires. In the event of an emergency, as described in this Plan, all employees will evacuate the plant buildings and report to a designated assembly area or shelter-in-place as directed by the Emergency Coordinator. An outside emergency responder (i.e., Fire Department, a contract response company) will

be contacted for emergency response.

3.10 Establishment of Objectives and Priorities for Response

3.10.1 Immediate Goals

In the event of an accidental discharge or spill of hazardous materials, the immediate objective is to protect human health and the environment by:

1. Containing the spill to the smallest possible area;
2. Preventing potential ignition of the released material; and,
3. Recovering and packaging the spilled materials.

3.10.2 Later Goals

After the accident or emergency has been address, the later goals of the response are:

1. Investigate the nature and extent of impact resulting from the incident and complete the cleanup or remediation of affected areas (coordinate with local, state and federal agencies, as needed);
2. Diagnose the cause;
3. Evaluate the adequacy of the response, safety equipment, staff preparedness and training, and the ability of the site's engineered controls to address/manage the type of emergency that just occurred.
4. Evaluate pros and cons of the Facility's response actions (i.e., lessons learned); and,
5. Revisit the Contingency Plan and make modifications as needed.

3.11 Mitigation Actions for Releases

3.11.1 Immediate Emergency Actions for Releases

Emergency procedures are the responsibility of the Emergency Coordinator or Alternate (or designee) and not the general employees of CEA. Immediate procedures are outlined below:

1. The Emergency Coordinator or Alternate (or designee) will identify the character, exact source, amount and extent of any released materials and assess possible hazards to human health or the environment.
2. If necessary, the Emergency Coordinator or Alternate (or designee) will order the evacuation of all personnel within the Facility using predetermined routes as shown on DRAWING 2. As an alternative, the Emergency Coordinator or designee can order personnel to shelter-in-place.
3. If the Emergency Coordinator or designee determines there is a threat to human health or to the environment outside the Facility he will report his findings immediately to local authorities, especially if evacuation of local areas is advised (see procedural flow diagrams) by calling 911.

3.11.2 Response to Small Spills or Leaks

For all spills or leaks, the following guidelines will be followed as closely as possible by individuals specified only by the Emergency Coordinator or his/her alternate. If the spill is small enough to be absorbed, neutralized or otherwise controlled (i.e., typically 55-gallons or less) at the time of release by employees in the immediate release area; does not pose an adverse exposure hazard to employees; and is within the scope of the employee's training then the spill will be handled in the following manner:

1. Make sure all unnecessary persons are removed from the hazard area.
2. Survey the area. Identify the source and nature of the spill to determine if the area is safe and how best respond to the spill.
3. If flammable material is involved, remove all ignition sources, and use spark and explosion proof equipment and clothing in containment and clean up.

4. If possible, try to stop the leak.
5. Remove all surrounding materials that could be especially reactive with the materials in the waste. Determine the major components at the time of the spill.
6. Specific spill clean-up methods are provided in APPENDIX B to this Contingency Plan.
7. Use absorbent pads, booms, earth, sandbags, sand, and other inert materials to contain, divert, neutralize and clean up a spill if it has not been contained by a dike or sump. Most spills contained within a dike or sump can be pumped back into the appropriate storage tank or drum. If the released material is flammable, make sure that all electrical/mechanical equipment used in the response is explosion proof.
8. Procedure to follow for leaking drum:
   a. Move drum into or construct containment around area;
   b. Roll drum or stand up on end away from leak;
   c. Drain contents (transfer to clean drum);
   d. Label both drums accordingly;
   e. Absorb spillage or leakage with absorbent;
   f. Transfer absorbent waste to drum, label accordingly; and
   g. Store until final disposal.

9. If spilled materials are flowing off site, try to stop flow from the source by using sand, earth, sandbags, etc. If this is done, pump this material out into a temporary holding tank or drum as soon as possible. If the released material is flammable, make sure that all electrical/mechanical equipment used in the response is explosion proof.
10. Place all containment and clean-up materials in drums for proper disposal. Some items, such as absorbent rags or booms, may have to be cut up.
11. Place all recovered liquid wastes in drums for removal to an approved disposal site.

3.11.3 Response to Large Spills

For large spills (i.e., greater than 55-gallons) and/or small spills of an acutely hazardous material, the Emergency Coordinator or Alternate (or designee) will use the following procedure:

1. Call Glencoe Volunteer Fire Department if a fire is involved by dialing 911.
2. With the exception of small fires in the incipient stage, Facility employees are not to respond to a fire. Any response must be consistent with the employee's training and experience.
3. If exposed containers can safely be cooled with water spray and/or removed from the area, the Emergency Coordinator or Alternate may direct employees to do so. Note that fire emergencies generally supersede spill emergencies.

IF A HISSING SOUND COMES FROM A VENTING DEVICE OR IF A DRUM BEGINS TO BULGE OR DISCOLOR, WITHDRAW FROM THE AREA IMMEDIATELY.

4. If the spill can be safely contained through the use of absorbents, spill booms, storm drain covers or other appropriate spill equipment, the Emergency Coordinator or designee may direct properly trained employees to do so.
5. Contact an emergency response contractor listed in SECTION 1 for emergency spill response.
6. Contact the proper authorities (see SECTION 1) to report the spill or release as deemed necessary by the Emergency Coordinator or designee. Contact local authorities first so that, if necessary, downstream water users and/or persons downwind of the vapor can be notified and, if necessary, evacuated and/or sheltered. The Emergency Coordinator or Alternate (or designee) will be prepared to assist authorities in making the final determination relative to evacuation. However, the final decision to

evacuate the area will be the responsibility of the local agencies.

7. All emergency equipment used in the emergency will be returned to ready status prior to resumption of plant operations in the affected area. During the emergency, the Emergency Coordinator or designee should be aware of the following:
   a. If the Facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator or designee must monitor for leaks, pressure build up, gas generation, or ruptures in valves, pipes or other equipment, as appropriate.
   b. No waste or other materials that may be incompatible with the released material should be treated, stored, or disposed in the affected areas of the Facility until after cleanup procedures are completed
   c. Run-off (i.e., liquid wastes and/or fire water potentially mixed with wastes) from spills or firefighting operations, to the degree possible, should be contained in a safe, down gradient location, onsite and then recovered in competent vessels pending proper profiling and re-processing or disposal.

The Emergency Coordinator or designee will document the incident within 15 days and begin an investigation of the incident and the effectiveness of the emergency procedures.

3.12 Mitigation Actions for Fires

3.12.1 Precautionary Measures for Fires

In general, a fire can be extinguished by eliminating one of the four (4) basic components that keep it in the active state. They are:

Oxygen supply - Usually, oxygen is supplied by air.

Heat - BTUs are generated on a self-sustaining basis as a result of continuing oxidation.

Fuel - The material undergoing oxidation.

Chemical Reaction. The following precautionary measures are in place to minimize the spread of fire:

- Portable A, B, C fire extinguishers (see top insert) are located throughout the facility for use on trash, wood, building materials, flammable liquids and electrical fires are located throughout the Facility and are designated with identifying labels (see DRAWING 1). In addition to the fixed locations within the structures, forklifts and other onsite equipment are also equipped with fire extinguishers.
- Portable D (dry powder) fire extinguishers (see middle insert) are located in Building #2 (s) and Building #4 for use on combustible metals fires (see DRAWING 1).
- Two (2) fixed foam fire suppression stations (see bottom insert), #1 is west of the main administration building and #2 is in the middle of the Facility between the Building #1 and Building #4 (as shown in the photograph below), are for use on flammable liquids (see DRAWING 1).
- Plant personnel are trained annually on how to properly use fire extinguishers. All employees are trained in proper reporting and evacuation procedures.

TYPICAL DOLLY MOUNTED CLASS ABC HOSE UNIT AND CLASS D (DRY POWDER) EXTINGUISHER AT FACILITY

TYPICAL FIXED FOAM SUPPRESSION SYSTEM SHED AT FACILITY (FOAM STATION #2 – SMALL SHED ON THE LEFT)

3.13.2 Response to Fires and Explosions

1. The person discovering a fire will leave the immediate area and notify the Emergency Coordinator or Alternate by telephone or portable radio and provide the following information:
   a. Nature of the emergency;
   b. Location of the emergency;
   c. Size and extent of the emergency;
   d. Hazardous materials involved (if any);
   e. Person(s) injured and seriousness of injury;
   f. The name of the person providing notice of the emergency; and,
   g. The person's present location.

Note: The first priority for an employee discovering a fire should be notifying the Emergency Coordinator or Alternate Coordinator by telephone, portable radio or other direct means *so that the chain of command is aware of the situation and the fire department can be contacted, if needed.*

2. If the fire is small and contained (incipient) and does not involve hazardous materials:
   a. The Glencoe Voluntary Fire Department will be notified. Under extreme conditions, the Gadsden Fire Department can also be notified as a secondary or back-up option.
   b. At the same time, any employee with fire extinguisher training may extinguish the fire, if within his training and experience.
   c. If exposed containers can safely be cooled with water spray and/or removed from the area, the Emergency Coordinator or Alternate (or designee) may direct employees to do so. Note that fire emergencies generally supersede spill emergencies.
   d. After fire is put out, the accident scene will be surveyed for any other hazards and a cause analysis performed. All associated wastes will be contained and processed for disposal.

IF A HISSING SOUND COMES FROM A VENTING DEVICE OR IF A DRUM BEGINS TO BULGE OR DISCOLOR, WITHDRAW FROM THE AREA IMMEDIATELY.

e. The Emergency Coordinator or Alternate (or designee) will determine whether the building should be evacuated.

f. The Emergency Coordinator or Alternate (or designee) will be notified of any injuries or damage to the building.

3. If the fire is determined to be significant:
   a. If necessary, the Emergency Coordinator or Alternate (or designee) will order the evacuation of all personnel within the Facility using predetermined routes depicted on DRAWING 2.
   b. All personnel and visitors will proceed to the nearest designated assembly area unless that point is affected by or downwind of the fire, in which case they will process to an alternate assembly point.
   c. The Emergency Coordinator or Alternate (or designee) will notify the Glencoe Voluntary Fire Department by dialing 911 in order to give the emergency center the name and address of the Facility and the nature of the call (fire). Under extreme conditions, the Gadsden Fire Department can also be notified as a secondary or back-up option.
   d. All feed lines and additional equipment in the area of the fire will be shut down as necessary and practical.
   e. Upon arrival of the fire department, the Emergency Coordinator or Alternate (or designee) and employee discovering the fire will report the location and type of fire and any missing employees.
   f. Employees shall not speak with the media. All media requests will be referred to a designated media point of contact.

After the incident is complete, the Emergency Coordinator or Alternate (or designee) and person discovering the fire will document the incident.

During the emergency, the Emergency Coordinator or Alternate (or designee) should be aware of the following:

1. If the Facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator or Alternate (or designee) must monitor for leaks, pressure build up, gas generation, or ruptures in valves, pipes or other equipment, as appropriate.
2. No waste or other materials that may be incompatible with the released material should be treated, stored or disposed in the affected areas of the Facility until after cleanup procedures are completed

3.13 Notification

If the Emergency Coordinator or Alternate determines that the Facility has had a release, fire, or explosion which could threaten human health or the environment outside the Facility (release of hazardous waste or hazardous waste constituents from the active portion of the Facility is defined as such a threat), he must report his findings as follows:

1. If the assessment indicates that evacuation of local areas may be advisable, the Emergency Coordinator or Alternate will immediately notify appropriate local authorities. The Emergency Coordinator or Alternate will

be available to help appropriate officials decide whether local areas should be evacuated; however, any decision to evacuate will be made by local officials.

2. The Emergency Coordinator or Alternate will immediately notify the **Alabama Emergency Management Agency (available 24-hours / 7 days per week [24/7]), the National Response Center (24/7), and the ADEM (normal business hours are 8:00 AM and 5:00 PM., Monday through Friday)**. See SECTION 1 for all contact and reporting names and numbers. The report will include:

   a. Name and telephone number of reporter;
   b. Name and address of Facility;
   c. Time and type of incident (e.g., release, fire);
   d. Name and quantity of material(s) involved, to the extent known;
   e. The extent of injuries, if any; and
   f. The possible hazards to human health or the environment outside the Facility.

3.14 Requirements Following an Emergency

Prior to resumption of operations, the Emergency Coordinator or Alternate will ensure that all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use.

The Facility must note in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan. Within 15 days after the incident, the Emergency Coordinator or Alternate (or designee) will submit a written report on the incident to the ADEM.

That report will include:

1. Name, address, and telephone number of the owner or operator.
2. Name, address, and telephone number of the Facility;
3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

4 Personnel Training

4.1 Training will be given to facility personnel whose duties have a direct effect on hazardous waste management and/or hazardous waste accumulation, whether by direct contact with the hazardous waste or through hazardous waste management activities. Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the ADEM and EPA requirements and will include all elements of the regulations.

4.2 Training Director

4.2.1 This program will be directed by a person trained in hazardous waste management procedures and will include instruction that teaches facility personnel hazardous waste management procedures, including implementation of the Contingency Plan, relevant to their positions.

4.3 Training Program

4.3.1 At a minimum, the training program is designed to ensure facility personnel are able to respond effectively to emergencies by familiarizing themselves with emergency procedures, emergency equipment, and emergency systems. Facility personnel will be directed in the procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment, automatic waste feed cut-off systems, communications or alarm systems, response to fires or explosions, response to groundwater incidents and shut down operations.

4.3.2 All emergency response team members are trained to 29 CFR 1910.120(q). Facility personnel will be given the required training within 6 months after the date of their employment or assignment or to a new position at the facility, whichever is later. They are not allowed to work unsupervised until they have successfully completed the training program, thereafter an annual review will be conducted.

4.4 Documentation

4.4.1 The following documents and records will be maintained at the facility;

- Written job description of each position
- Job title
- Name of employee filling the position
- Written description of the type and amount of training given
- Documentation of training | Training records for former employees will be maintained onsite for at least a minimum of 3 years from the date the employee last worked at the facility. Training records for current employees will be maintained onsite until closure of the facility.

5 Condition of Containers

5.1 This section addresses the condition, handling, and storage of containers at the facility. The wastes received at this facility are contained in DOT approved containers that are compatible with the waste within. All containers are inspected for rusting or structural defects prior to being stored. If a container is determined to be leaking the contents are transferred to another container that is in good condition or processed immediately.

5.2 All containers are stored in the appropriate containment system with adequate volumes (see section 10 CONTAINMENT).

5.3 Management of Containers

5.3.1 All containers that contain waste materials are kept closed during storage except when adding or removing waste.

5.3.2 All containers are handled in such a way as to minimize the possibility of rupture, leakage, or other damage to the container.

5.3.3 All containers greater than thirty (30) gallons will not be stacked more than two high.

5.4 Shredding

5.4.1 The upgraded shredder unit was installed in Building #4 and operations began in late March of 2017. In a letter dated 12/15/2016 CEA notified the Department that the shredder unit and dewatering screw conveyor (Model MS 4220) was replacing the model # MS-2817 that was originally approved in the 2013 permit application. In March of 2019 CEA submitted a Class I MOD to relocate the existing shredder from Building #4 and into Building #2. CEA is submitting a Class II MOD in June 2019 to add an additional second identical shredding unit which will sit side by side to allow for both units to feed processed material directly into an end dump trailer that will be positioned within the containment of the building. Refer to drawing A2.1 dated 3.15.2019.

CEA receives containers of expired medicines or pharmaceuticals as either non-regulated or as RCRA hazardous waste such as P and U listed wastes. The containers are rigid in design, UN rated, and approved by D.O.T. for such type of pharmaceutical waste. The containers of pharmaceutical wastes will be received and checked in. These pharmaceutical wastes will then be processed in the shredder. The technicians working in this department conduct a quality control inspection to identify off-spec materials that are not desirable for shredding or prohibited for receipt by the facility. Material can be fed to the shredder via a conveyor belt, or manually in which employees remove the lids from the containers and dump the contents into a hopper. The technicians visually inspect the contents as they dump the material to look for non-conforming waste that may have been inadvertently packaged by the generator. The contents of the hopper (when full) are dumped into a shredder for final processing. The shredded material drops down into a collection hopper or through a dewatering screw into an end dump trailer. The shredded debris will be sent to a RCRA incinerator or to a cement kiln as fuel. Liquids from the shredded material will be pumped out of the hopper into a tote. If the resulting liquids are amenable to fuel blending the tote will be transferred to the tank farm for fuel blending (directly into a tanker for outbound disposal; not fuel blending into the tank farm i.e. T-1 through T-6), otherwise it will be shipped off site for RCRA incineration.

5.5 Inspections

5.5.1 Inspections shall be accomplished in accordance with the schedule set forth in Section 7 INSPECTIONS.

6 Tank Systems

6.1 Purpose

CEA currently holds a RCRA Part B Permit which expires in September 25, 2024. This Tank Assessment Report is prepared, certified and submitted in satisfaction of requirements found in the State of Alabama Department of Environmental Management Administrative Coder. 335-14 (Revised Effective March 26, 2013); specifically, Chapter 335-14-5, Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, Section 10, Tank Systems.

6.2 Scope and Organization of the Certification

There are six aspects of a tank certification. This Tank Assessment Report is organized to address each of the aspects described below.

6.2.1 First, the structural integrity of the tank(s) must be determined. The focus of this aspect is to ensure the tanks have the structural strength to hold the hazardous waste that is to be stored and that the tanks are constructed of a material that is compatible with the waste stored.

6.2.2 The second aspect is the structural integrity of the support system that holds the tanks. The focus is to ensure that the structural supports can hold the tanks when they are full and that the supports are adequately designed to withstand seismic and wind loads.

6.2.3 The third aspect is the foundation on which the tank(s) and the supports rest. The focus is to determine if the foundation can support the fully loaded tanks and supports. Both frost heave and flotation due to hydraulic saturation should be considered if applicable.

6.2.4 The fourth aspect addresses corrosion. The focus is to ensure the materials used in the construction of the tanks and ancillary systems are compatible with the wastes stored. Special considerations apply if the tank(s) are in contact with the soil.

6.2.5 The fifth aspect examines the adequacy of secondary containment. The focus of this aspect is on both the structural integrity of the containment and on the ability of the containment to hold at least 100% of the volume of the largest vessel. Coating compatibility is also examined.

6.2.6 The sixth aspect addresses piping and ancillary equipment. The focus of this aspect is to ensure piping and ancillary equipment is in containment and can be visually inspected daily.

6.3 Background

6.3.1 CEA began operations in June of 2016. The original facility received its Interim Status permit in 1986. The facility was grandfathered into the RCRA program and granted its Part B Permit in 2004.

6.3.2 CEA is a full-service waste management company. The company is a fully permitted Part B facility located in Etowah County, Alabama at 402 Webster Chapel Road, Glencoe, AL 35905. The permitted active site is 7.3 acres surrounded by 32 acres of woodland property, which is also owned by CEA. Security is maintained 24 hours per day, 7 days per week, by CEA personnel, security guards, and surveillance cameras. The facility is surrounded by a 6-ft. chain-link fence with a 3-strand barbed wire overhang and has controlled access.

6.3.3 CEA receives hazardous and non-hazardous waste from several business sectors: industrial, medical, and governmental. Waste and chemicals that are eligible for beneficial reuse are transported to CEA for storage, repackaging, and recycling. Wastes are beneficially reclaimed or reused and disposal. CEA has a wide range of capabilities for managing various waste streams from hazardous to non-hazardous waste processing to include fuels blending, bulking, lab packaging, and unpacking.

6.3.4 This Tank Assessment Report addresses CEA fuels blending operations. It is the goal of CEA to maximize the waste-to-energy programs available. CEA receives spent solvents and ignitable wastes and blends them to maximize their Btu content.

6.4 Process Description

CEA receives, and blends spent solvents and other ignitable hazardous wastes. The company receives wastes by tanker, by van, in containers, or by bulk shipment.

6.4.1 Hazardous Characteristics of Wastes

The exact characteristics of the waste stored at CEA vary daily. Based on experience, the following accurately describes the waste potentially present at any one time.

- Waste flammable liquids with a Flash Point< 140 F
- pH: 4-10
- Heat content> I0,000 Btu

The following are the waste codes that may be present in the blended mixture: D LISTED WASTES, F LISTED WASTES, K LISTED WASTES, P LISTED, and U LISTED WASTES.

6.4.2 Delivery by Tanker

Waste that is delivered in tankers is offloaded directly into the storage tanks. (There are six, 15,000-gallon storage tanks located in a nest within secondary containment.) On occasion, the tanker's internal pump is used to move the hazardous waste into the storage tanks. More frequently, one of the pumps located in the storage tank secondary containment area is used. Tankers are parked next to the storage tank containment area on a coated concrete pad that slopes into the containment area. The tanker uses its hoses to attach to the manifold that services the storage tanks. The intake manifold that services the tanker is in a trench so that all piping leading from the tanker to the storage tanks is visible. Any leak which may occur in the transfer of hazardous waste from the tanker to the storage tank would be immediately observed. Because the tanker sits on a coated concrete pad that slopes into the containment area, and because the piping used to transfer the hazardous waste is in a trench that also slopes into the containment area, no release of hazardous waste to the environment is likely. Any hazardous waste that is spilled during transfer would drain into the secondary containment area. At the time of my observation, there was no evidence of any spill on the coated concrete near the intake manifold or in the

coated trench containing the piping servicing the tanks.

6.4.3 Waste That Arrives in Containers

Containers are pumped by a dedicated pump through piping that is in a coated trench to the storage tanks.

6.5 Regulated Tanks

The following tanks and ancillary equipment are regulated and are addressed in this report.

Description	Size/Capacity	Number	Location	Composition
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#1	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#2	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#3	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#4	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#5	Containment Area	0.45 inch plate steel
Storage Tank	11.44ft diameter x 21.16ft height	Storage Tank#6	Containment Area	0.45 inch plate steel

6.6 Assessment

6.6.1 Structural Integrity

The ultimate structural integrity of the tanks is determined by visual inspection, through the analysis of ultrasound reports, and by the application of API 653 (Tank Inspection and Repair) standards. All tanks present have been in continuous service in excess of 14 years. Requirements to observe and document proper installation of the tanks were addressed in the November 1991 BCM RCRA Tank Assessment submitted to, and on file at, ADEM Similarly, the ADEM code requires tanks to be leak tested prior to being put into service. Neither BCM in 1991 nor HGS at present can locate documentation that leak testing was performed. The tank systems have been in service for 14 years and there is no evidence of leaking.

6.6.2 Storage Tanks

CEA utilizes six (6) above ground atmospheric tanks that have a volume of 15,000 gallons each. The tanks are 21.16 feet high and have a diameter of 11.44 feet. The tanks are conical and are constructed of 0.45-inch carbon plate steel. The tanks were originally constructed in approximately 1945 by Sharpsville Steel Fabricators, Inc. They were constructed as pressure vessels. The company is no longer in business and the standard to which the tanks were constructed is not known. Regarding compliance with NFPA 30 requirements that prescribe minimum spacing standards, Table 22.4.1.1(b) of the 2008 Edition of the *Flammable and Combustible Liquids Code Handbook* was reviewed. The storage tanks comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys or an adjoining property line.

Visual inspection of each of the tanks revealed no noticeable corrosion, punctures, indentations or other defects. Ultrasound inspections were performed on each tank on July 16, 2013. A total of 32 measurements were taken on each tank. The minimum observed thickness was 0.262 inches.

T (actual) = 0.262 inches

Calculation of the minimum allowable tank thickness following API 653, Edition 3, Section 4.3.3.1 is provided below.

T (min) = (2.6HH-1) (D) (G) /(S) (E) Where:

D = tank diameter H=height S= 0.429T

Y= yield strength of plate or 30,000 psi if not known

G= highest specific gravity of material stored

T= tensile strength of plate or 55,000 psi if not known

E=joint efficiency or 1.0 if not known

T (min) = (2.6) (20.16) (11.44) (1.4)/ (23,595) (1.0) T (min) = 0.0356 inches

T (actual)> T (min)

The results of the ultrasound testing reflect adequate steel is present to hold the hazardous waste stored.

6.6.3 Structural Integrity of the Tank Support System

John Funk, PE of David Funk Engineering, Inc. was commissioned to assess the adequacy of the storage tank support system. His report of findings is found at Attachment 3.

Based on the findings of the structural engineer, the support system for the storage tanks is adequate to support the tank and its full load.

6.6.4 Foundations

As described in the November 1991 BCM Tank Assessment Report, "The tanks are resting on a slab foundation and, as such, the tanks are not in contact with the soil or water."

The foundations and sub-grade of the floor slab upon which the tanks sit *are compacted native soils overlain by 2-4 inches of compacted crushed Limestone. Compaction tests were not performed on the sub-grade after compaction, and prior to construction; however, the facility has operated with folly loaded tanks for about two years with no noticeable settlement of the structure. The plant site* is not *influenced by any known fault system, therefore, any uplift pressures that might be experienced would be inconsequential pressures caused by the expansion and contraction of the clay* in *the native soil (generally less than 10% of the total soil composition).*

The...tanks are not subject to dislodgement or flotation since they are not located in *a saturated zone. Seismic action* is *not a likely cause of structural failure for these tanks since the geographic location is* not *subject to excessive seismic activity.*

The facility is *not located* in *a frost heave zone and, therefore, the tanks...are not subject to the damaging effects of frost heave."*

On August 20, 1996, John Funk, PE issued a report regarding the structural adequacy of the foundation for the six storage tanks. He concluded, *"...the existing concrete slab foundation is capable of safely supporting the six relocated storage tanks."*

A visual inspection of the foundations was conducted by Mr. Harry Summers, PE on July 17, 2013. There was no evidence of settlement, cracks, gaps or structural damage or deterioration.

Based on visual inspection and current conditions, and on the findings of Mr. Funk, a licensed

professional structural engineer, I conclude that the foundations are adequate to support the loads to which they are subjected.

6.6.5 Corrosion

Because the tanks and ancillary equipment are not in contact with the soil or water, a detailed corrosion analysis by a certified corrosion engineer or expert is not required. However, analysis must be performed to demonstrate that the tanks are constructed of a material that is compatible with the wastes stored for the anticipated service life of the tanks.

6.6.5.1 Storage Tanks

The storage tanks are constructed of .45-inch plate carbon steel. The plates and welds are free of defect and appear in good repair. There is no evidence of corrosion or deterioration.

Annual ultrasound results are available from 2008 to the present. Using 192 readings taken in 2008 as a baseline and comparing it to 192 readings taken on July 16, 2013, no corrosion is noted. Based on the predicted corrosion rate and the minimum thickness required for these storage tanks, the tanks have an indefinite service life.

6.6.6 Secondary Containment

Secondary containment is provided for all tanks and ancillary equipment as detailed below. CEA has selected daily visual inspection as its method of leak detection. A procedure is in place and daily inspections are being performed and documented.

6.6.6.1 Storage Tanks

6.6.6.1.1 Structural Adequacy

The structural adequacy of the containment area was addressed in a letter, dated August 20, 1996, by John Funk, a licensed structural engineer. See Attachment 2. He concluded that the containment area was structurally sound and adequate. Visual inspection of the area conducted on July 17, 2013 found that the area was free of cracks or other defects, that the coating was in good repair, and no changes had been made that could potentially impact the area's structural functionality.

6.6.6.1.2 Containment Adequacy

Secondary containment for the storage tanks is provided by an epoxy-coated, concrete liner. The liner is designed to completely encompass all the tanks. According to plant personnel and as verified by visual inspection, the concrete liner was placed as a monolithic pour without construction joints or seams. The liner has a rectangular shape with outside dimensions of 30 feet x 60 feet. The long axis of the rectangle is oriented north-south. The structure has a 0.3% slope from southwest to southeast and a 0.4% slope from north to south. A pump intake system is located in the southeast corner of the containment area for the removal of accumulated precipitation or of spilled waste. Additional secondary containment is provided by an 11.5 x 9.5-foot reinforced concrete basin. The basin has the same floor and wall elevation as the main containment area and is located at the southeast corner of the main containment area. The walls and floor were designed to prevent migration of released waste to the environment. Both the walls and the floor are structurally capable of resisting lateral earth pressure. The floor slopes toward the main containment area to provide positive drainage to the sump. Precipitation and any spilled waste accumulate in the 11.5 x 9.5-foot concrete basin area where a manually activated precipitation pump pipes it to one of the tanks in the containment area. The floor and walls of the

containment area are coated with chemically resistant epoxy coating selected for its compatibility with the wastes present.

Volume Analysis

Primary Containment 29 x 59	1,711 sq. ft. Additional
Containment 11.5 x 9.5	109 sq. ft.
Pump pit Containment 11.5 x 11	126 sq. ft. Total Available
Containment Area	1,946 sq. ft. Total Available
Volume (height 2.583 ft.)	5,026 cubic ft.
100% of Largest Tank (15,000 gallons)	2,005.5 cubic ft.

Volume of Rainfall during a 25 year/24-hour event

6.75/12 feet x 1, 946 sg ft.	109.46 cubic ft.
Volume 100% largest tanks and rainfall	2,114.96 cubic ft.
Excess containment capacity	**2,911.04 cubic ft.**

The Secondary Containment for the six (6) 15,000-gallon storage tanks is sufficient to capture a release of 100% of one of the tanks plus the accumulated rainfall of a 25 year/ 24-hour rainfall event.

6.6.7 Ancillary Equipment

The regulation requires that all ancillary equipment be supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction. Ancillary equipment must be provided with secondary containment. Aboveground piping and welded flanges, joints and connections must be inspected for leaks daily.

Pumps that support the drum pumping operation are located in the secondary containment area. Pumps that support the storage tanks are located in the storage tank containment area. All piping is welded, is visible, and is located in coated concrete trenches that drain into the storage tank containment area.

Plant personnel indicate that all pumps and piping are inspected daily for leaks.

At the time of my inspection, there were no leaks or evidence of leaks from the piping or pumps. Trenches were free of cracks or other defects. The piping appeared free of corrosion and all welds appeared to be intact.

CEA has policies in place and implemented to ensure the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite.

6.6.8 Regulatory Crosswalk

The following table identifies the regulatory requirements of a Tank Assessment Report. It also leads reviewers to that section in this report that addresses the requirements cited.

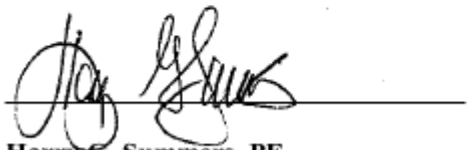
ADEM Citation 335-14-5-.10	Description	Location in this report (page)
(3)(a)	Assessment and certification of design	15
(3)(a) 1.	Identification of design standards	Tub 6 Tank 7
(3)(a) 2.	Characteristics of hazardous waste to be handled	2
(3)(a) 5.(i)	Tank foundation will maintain the load of the full tank	Attachment 2
(3)(a) 5. (ii)	Tank is anchored to prevent flotation if it is in a saturated zone	8
(3)(a) 5. (iii)	Tanks will withstand frost heave	8
(3)(b)	Tanks were properly handled during installation	5
(3)(d)	Tanks tested for tightness prior to being placed in use	5
(3)(e)	Ancillary equipment must be supported and protected against physical damage	13
(4)(b) 1.	Secondary containment designed to prevent any migration of hazardous waste to the environment	Tub 10 Tank 12
(4)(b) 2.	Secondary containment capable of detecting and collecting releases	10
(4)(c) 1.	Constructed or lined with materials compatible with the waste stored	Tub 11 Tank 12
(4)(c) 2.	Placed on a foundation capable of supporting the secondary containment	Attachment 2
(4)(c) 3.	Provided with a leak detection system	10
(4)(c) 4.	Secondary containment is sloped	12
(4)(d) 1.	Secondary Containment must be provided with an exterior liner	12
(4)(e) 1. (i)	Liner is designed to contain 100% of the capacity of the largest tank within its boundary	12
(4)(e) 1.(ii)	Liner must have sufficient additional capacity to contain precipitation from a 25 year, 24 hour rainfall event	12
(4)(e) 1. (iii)	Liner must be free of cracks or gaps	11
(4)(e) 1. (iv)	Liner must be designed to surround the tanks completely and cover all surrounding earth likely to come into contact with the waste	Tubs 10 Tanks 12
(4)(e) 1. (v)	Liner must be provided with an	12

	impermeable interior coating if concrete is used. The coating must be compatible with the waste stored.	
(4)(f)	Ancillary equipment must be provided with secondary containment (e.g. trenches)	13
(4)(f) 1.	Aboveground piping must be inspected daily	13
(4)(f) 2.	Welded flanges, welded joints and welded connections on ancillary equipment must be inspected daily	13
(9)(a) 2.	Special requirements for ignitable waste…the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite.	13
(9)(b)	Complies with protective distances prescribed by the NFPA	Tubs 6 Tanks 7

6.6.9 Professional Engineer Certification

The following certification statement is provided in satisfaction of ADEM Admin Code r 335-14-5-.10, specifically those requirements identified in Section 5.0 above.

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

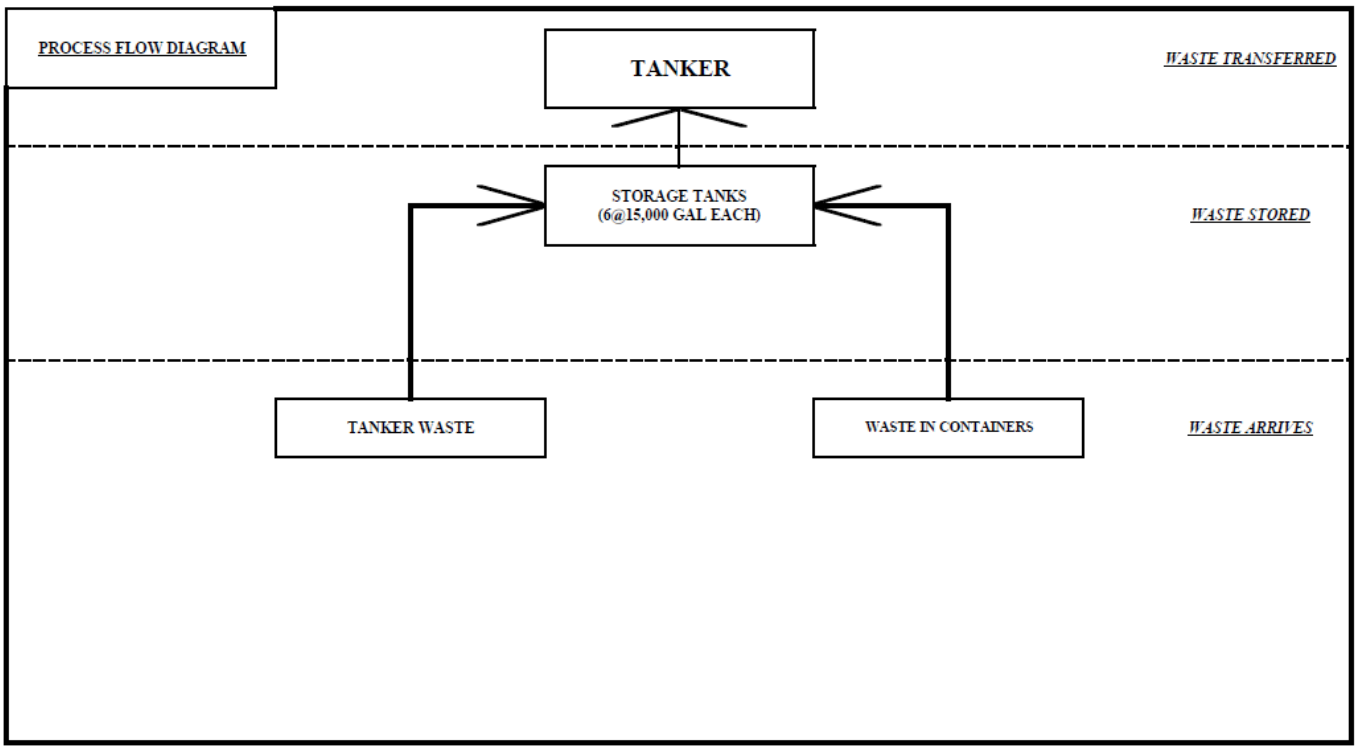


7/24/2013

Harry G. Summers, PE **Date**

Alabama License Number 17129

Clean Earth of Alabama, Inc. – ALD981020894
Attachment #1 Process Flow Diagram



Attachment #2 Structural Engineer's Report – Foundation

DAVID FUNK ENGINEERING, INC.
CONSULTING STRUCTURAL ENGINEERS
P. O. BOX 480 - TELEPHONE (205) 733-8491
PELHAM, ALABAMA 35124

August 20, 1996

Mr. Scott Skipper
Skipper Engineering, Inc.
171 Woodland Drive
Rainbow City, Alabama 35906

RE: Fisher Industrial Services
Containment Slab Foundation

Dear Scott:

This office has completed a structural engineering review of an existing concrete containment slab foundation pertaining to its capacity to support six relocated storage tanks. Our review and accuracy of our conclusions rely upon information provided by the owner defined as follows:

1. Relocated storage tanks are 15,000 gallon tanks to be filled with a fluid weighing 9.5 pounds per gallon.
2. The tanks are built of 0.45" thick steel plates. Each tank is supported by eight channel legs, each with a base plate measuring 5.0" by 8.0".
3. The existing slab is a minimum 12" thick, of 4000 psi concrete, with a layer of 5/8" diameter reinforcing bars on 12" centers each direction located at mid-depth of slab. A concrete containment wall around the slab perimeter is 1'-6" high, 5" wide at the top and 6" wide at the base, with reinforcing dowels embedded into the slab.

The results of our review indicate that the existing concrete slab foundation is capable of safely supporting the six relocated storage tanks. Each tank leg can be anchored to the existing slab with a 1" diameter "Hilti Kwik Bolt", 4-1/2" embedment into concrete. See the enclosed sketch. If interference occurs from an existing stiffener, a new plate can be welded to the edge of an existing base plate to receive a new anchor bolt.

If we may be of further service in the matter, please advise.

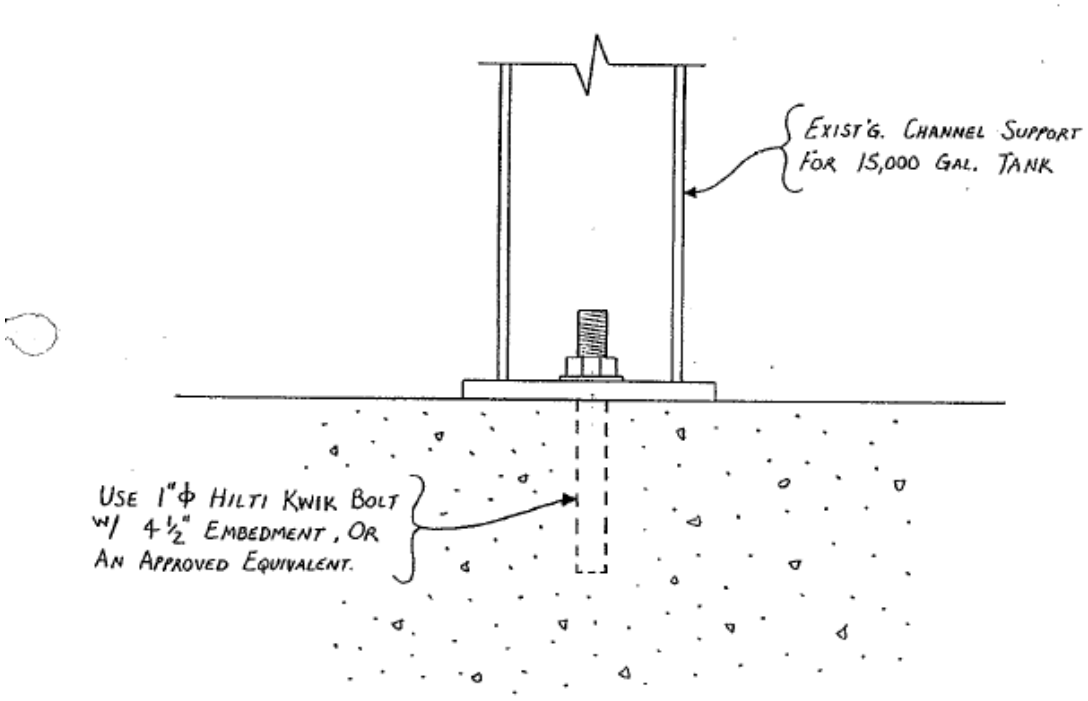
Sincerely yours,

DAVID FUNK ENGINEERING, INC.

John D. Funk

John D. Funk, P.E.

Enclosure


EXIST'G. CHANNEL SUPPORT
FOR 15,000 GAL. TANK
USE 1"ϕ HILTI KWIK BOLT
W/ 4½" EMBEDMENT, OR
AN APPROVED EQUIVALENT.

DAVID FUNK ENGINEERING, INC.
CONSULTING STRUCTURAL ENGINEERS
TWO RIVERCHASE OFFICE PLAZA, SUITE #124
HOOVER, ALABAMA 35244-2810
TELEPHONE (205) 733-8491

July 23, 2013

VIA EMAIL TO harry@hgsengineeringinc.com
ORIGINAL VIA U.S. MAIL

HGS Engineering, Inc.
ATTN: Mr. Harry Summers
1121 Noble Street
Anniston, AL 36201

RE: 15,000 Gallon Storage Tank Frames
EWS Alabama, Inc.
402 Webster Chapel Road
Glencoe, Alabama 35905

Dear Mr. Summers:

This office has completed a structural engineering review of six tank frames located at the above mentioned facility. The purpose of the review is to determine whether each frame can safely support a 15,000 gallon tank and its contents. Our review and accuracy of our conclusions rely upon information provided by either HGS or the tank owner and is defined as follows:

1. The tanks have a 15,000 gallon capacity to be filled with fluids weighing 9.5 pounds per gallon.
2. The tanks are built of 0.45" thick steel plates. Each tank is supported by eight channel legs, each with a base plate measuring 5.0" by 8.0".

The undersigned visited the site on July 22, 2013, to inspect the frames on each of the tanks. Five of six tank frames are built exactly the same way. One different frame had 1/2" thick by 6" wide by 4'-0" long plates welded to the flanges of the channel legs starting approximately 2 1/2" above the top of the concrete slab. There was no indication as to why these plates were added to the channel legs. The addition of plates will increase the lateral stability of the channel legs.

Repair work was observed on one channel leg of one tank frame. It appeared the flanges of the channel leg were damaged and repaired by adding a plate 1/2" thick by 1 1/2" wide

by 10" long to the exterior side of each flange of the channel. No other modifications were observed on any of the other tank frames.

The results of our review indicate the tank frames are capable of safely supporting the tanks and contents including the additional overhead walkway supported at various channel legs. Unless there are reasons unknown to us, it is recommended each channel leg be anchored to the concrete slab with one 1" diameter Hilti Kwik bolt with a 4 1/2" embedment into the concrete slab. Follow the manufacturer's recommendations when installing the anchor bolt.

Should you wish to discuss the contents of this report, or if we may be of further service in the matter, please advise.

Sincerely yours,

DAVID FUNK ENGINEERING, INC.

7-23-13

ALABAMA REGISTERED NO. 19013 PROFESSIONAL ENGINEER JOHN D. FUNK

John D. Funk, P.E.

JDF/jf

7 Facility Inspections

7.1 The inspection of the facility components and equipment is an integral part of an overall personnel safety and environmental security program. The purpose of this section is to describe the procedures for inspecting the hazardous waste management units at the facility and to establish a schedule for conducting the inspections. Routine inspections are required to detect equipment malfunctions, deterioration, leaks, discharges and unauthorized entry.

Inspections are conducted on a predetermined schedule. Identified problems are noted in the Inspection Report. The nature of the problem, the date and time the problem is discovered, is noted on this report. An example inspection log is included in this plan for illustrative purposes. The Facility Manager or designated representative will assess the problem and have necessary repairs and/or replacement of equipment identified as defective or damaged. Repair/replacement of affected equipment will be completed on a priority basis, as soon as possible or practical. The date, time, and nature of the repair or replacement action taken is then documented on the Work Order which is then given to the Plant Manager. The documents are retained on file for an indefinite period of time (i.e., not less than 3 years).

7.2 Subpart BB - Air Emission Standards for Equipment Leaks

7.2.1 CEA (CEA) has implemented the following program for Leak Detection and Repair (LDAR) for the six (6), fifteen thousand (15,000) gallon storage tanks located in the tank farm containment area of the facility. The key elements of the plan that will be addressed in this program are as follows:

- Maintaining a leak rate goal below detectable limits (<500ppm)
- A listing of all equipment that has the potential to leak
- Procedures for identifying leaks
- Procedures for repairing leaks
- Procedures for evaluating new or replacement equipment that will minimize or eliminate leaks
- A listing of LDAR personnel and a description of their roles and responsibilities
- Procedures for evaluating new construction to identify components that may be subject to the LDAR requirements
- Procedures for submitting updates or additions to the LDAR program to the required agencies
- Procedures for identifying regulated components
- Monitoring
- Inspection
- Recordkeeping
- Best Management Practices (BMP)

7.3 List of Equipment subject to the program:

COMPONENT	CODE
Blind Flanges	BFL
Couplers	C
Cap	CA
Double Tee	DT
Elbow	E
Flange	FL
Hand Valve	HV
Opening	O
Man way's	MW
Tee	T
Tank	TK
Union	U
Pump	P

7.4 Procedures for Identifying Leaks

7.4.1 Detection of leaks is an ongoing process, detected by daily visual inspections and Method 21.

7.4.2 Daily visual inspection: At least daily a visual inspection is performed. This inspection includes both a visual and auditory inspection of tank farm components. An auditory inspection consists of listening for hissing, dripping, etc. The results of this inspection will be noted on the Daily Inspection form.

7.4.3 Monthly monitoring using Method 21, monitoring for leaks is completed monthly and/or quarterly as specified and appropriate. This is accomplished by the tank farm supervisor, the Assistant Plant manager, and/or the EH&S Manager or designee. Equipment used is PhotoVac MicroFID, or equivalent equipment. Any personnel that has been tasked to conduct monitoring shall be trained on how to calibrate and use the testing equipment (see training in section) prior to use. The EH&S Manager takes recorded readings and compiles them results into a report that is kept on site.

7.5 Procedures for Repairing Leaks

Once a leak is discovered either visually or during monthly monitoring, the leaking component is isolated and contained. Any spilled material is cleaned up and notification is given to the Plant Manager or direct supervisor. The Plant Manager will evaluate the leak and generate a work order for the repair(s). One copy of the work order will be placed in the Daily Inspection Log book, and one copy will be given to the EH&S Manager. The Facility Manager will arrange for repairs to be accomplished either by plant personnel or an outside source. Once repairs have been completed the work order shall be updated by the individual performing the repair. This completed work order must include the following information:

- Name of person performing the repair
- What repairs were completed
- What repairs were not accomplished and the reason(s)
- Date of repair
- Results of visual inspection of installed components
- Verification by the Assistant Plant Manager, Plant Manager, or the EH&S Manager that the repair(s) have been completed.

7.6 Delay of Repair

7.6.1 No component will be placed back into service until repairs are completed unless this involves a process unit shutdown. If a component cannot be repaired because a process unit must be shut down to perform the repair, and then the component shall be placed on the Delay of Repair List. For any component placed on the Delay of Repair List, the following information must be recorded:

- Identifying number and description of component
- An explanation of why the component cannot be repaired
- An estimated date of repair

7.6.2 Repairs shall be accomplished for components that have been placed on the Delay of Repair List before the end of the next hazardous waste management unit shutdown (40 CFR 264.1059(a)). Repair for pumps and valves must be accomplished as soon as possible but no later than six months after the leak was detected (40 CFR 264.1059(d)(2) (pumps), and (e) valves). Once repairs have been accomplished, monitoring should be done over several days to ensure that the leak repair is successful.

7.7 Procedures for Evaluating New or Replacement Components

7.7.1 All new or replacement components that are replacing components that were identified as leaking during the last monitoring cycle shall be visually inspected for leaks at the time the component is placed into service. Those components installed by an outside contractor or other entity shall be inspected by plant personnel prior to being put into service.

7.7.2 All components shall be monitored using method 21 immediately or no later than the next scheduled monitoring cycle. This is not to exceed 30 days from the time the component is installed. Components that are installed as part of preventive maintenance must be monitored using method 21 during the next monitoring cycle. All new components that are installed either as a result of leak detection or preventative maintenance must be tracked using the work order program defined in section 4.0.

7.8 LDAR Personnel

The following Facility personnel are the individuals that will be adequately trained to perform LDAR inspections, monitoring and their associated duties and responsibilities.

Facility personnel will be adequately trained to perform LDAR inspections, monitoring and their associated duties and responsibilities.

Title	Responsibility
Plant Manager	• Generation of work orders • Verification of repairs • Dissemination of work orders • Tracking work orders
Assistant Plant Manager	• Verification of repairs • Dissemination of work orders • Method 21 monitoring • Daily Visual Inspection
Tank Farm Supervisor	• Verification of repairs • Repair or replacement of leaking components • Preventative maintenance repairs • Method 21 monitoring • Daily visual inspections

Maintenance	• Repair or replacement of leaking components • Preventative maintenance repairs
EH&S Manager	• Generation of work orders • Tracking work orders • Recording work • Verification of repairs • Method 21 monitoring • Recordkeeping • Report generation • Program maintenance

7.9 Program Updates

7.9.1 Updates will be accomplished by the EH&S Manager whenever any of the following occur:

- New components are added
- New personnel are added, or
- Roles or responsibilities of current employees are changed

7.9.2 Program updates will be sent to the Alabama Department of Environmental Management.

7.9.3 Procedures for Identifying Regulated components will be accomplished at the time of installation.

7.10 Monitoring

7.10.1 Monitoring shall be accomplished conducted by facility personnel. The equipment used shall be the PhotoVac MicroFID or equivalent. Monitoring shall be in accordance with the following schedule:

- Pumps – monthly
- Valves, connectors, flanges, fittings, etc. - *monthly
- Tanks – monthly

7.10.2 Diaphragm type pumps meet the specifications in 40 CFR 264.1052(e) [ADEM Admin. Code Rule 355-14-5-.28(3)] and therefore only require annual monitoring. These pumps must operate with no detectable emissions as determined at annual monitoring and initial designation. CEA operates only diaphragm type pumps in light liquid service, and assumes these pumps are used greater than 300 hours per calendar year.

7.10.3 This schedule shall be followed for six consecutive months. If after the sixth month no more than 2% of all listed components are above the threshold of 500 ppm then these components shall go to a quarterly monitoring schedule until greater than 2% of all components monitored are above the 500-ppm threshold.

7.10.4 Components deemed Unsafe to monitor:

7.10.4.1 All unsafe or difficult-to-monitor components must be included on a log with identification numbers and an explanation of why the component is “unsafe to monitor” or “difficult to monitor.” Monitoring can be deferred for all such components, but the facility must maintain a plan that explains the conditions under which the components become safe to monitor or no longer difficult to monitor.

7.11 Inspection

7.11.1 Visual inspections of the LDAR components are accomplished daily during operational days. The only exception to this is that on weekends one of the members of the security team will conduct the visual inspection except for the tops of the tanks due to safety concerns.

7.12 Recordkeeping

7.12.1 All records and reports shall be generated and kept by the EH&S Manager. All records shall be kept for a minimum of three years and be made available upon request to representatives of the Alabama Department of Environmental Management and/or EPA. See Appendix A for a representative copy of the log used to record monitoring results. This format and/or the contents may be changed to accommodate changes to the regulations, the addition to or subtraction from components, or changes to the monitoring plan.

7.13 Best Management Practices

7.13.1 All results should be entered into a spread sheet for easier maintenance. Results shall be entered into a report by the EH&s manager or other designated employee.

7.13.2 A review of the LDAR program shall be conducted no less than once every four years.

7.13.3 Before any monitoring is accomplished every effort will be taken to ensure that all components can be monitored safely and that all obstructions are removed prior to monitoring.

7.14 Training

7.14.1 Training shall take place initially before any duties are carried out, and at least annually thereafter. Training shall be conducted by a qualified trained personnel for all new employees, or by another qualified individual. All training shall be documented and maintained in the employee training file and shall be kept by the EH&S Manager.

8 Record Keeping

8.1 This document covers the records that are required to be kept at CEA, Inc. per ADEM regulations. This document addresses the type, retention, and procedures that will be followed with regard to the records that are required to be kept per ADEM code 355-14-3-.04, 355-14-4-.02, and 355-14-5-.05.

Records to be kept:

Type	Retention Time
Signed Manifests	3 years
Designated Facility Manifests	3 years
Biennial Report	3 years
Exception Report	3 years
Closure Report	3 years
Test results, waste analyses	3 years
Operating Record	3 years
Waste Minimization Plan	3 years

8.2 Biennial Report

This report must be prepared and submitted to ADEM by March 1 of each even numbered year. The biennial report shall contain the following information:

- EPA Identification number
- Calendar year covered
- EPA identification number, name, and location address for each off-site TSDF to which waste has been shipped during the year
- The name and EPA identification number of each transporter used to ship hazardous wastes to each TSDF.
- Description, EPA waste number, USDOT hazard class, and quantity of each hazardous waste shipped off-site to each TSDF.
- Description of the efforts undertaken during the year to reduce the volume and toxicity of wastes generated.
- Description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984.
- Any other information requested in the biennial report.

8.3 Exception Reporting

If CEA does not receive a copy of the manifest with a hand-written signature signed by the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter, CEA, as the generator of the waste must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

CEA must submit an Exception Report to ADEM if we have not received a copy of the manifest with the hand-written signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The exception report must include the following:

- A legible copy of the manifest for which the generator does not have confirmation of delivery
- A cover letter signed by CEA, or its authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.
- For rejected shipments of hazardous waste or container residues contained in non-empty

containers that are forwarded to an alternate facility by a designated facility using a new manifest (see 335-14-.05(3)(e)(1 through 335-14-6-.05(3)(e)1-6) the generator must comply with the above.

8.4 Closure Reporting

As a large quantity generator of hazardous waste, CEA, must notify ADEM no less than 45 days prior to the expected date of the beginning of closure of:

- Cessation of storage in, or moves container storage areas
- tanks systems
- drip pads and/or containment buildings

The notification to ADEM must include the following:

- Generators name, address, and EPA identification number
- The date the closure is expected to begin, and a timeframe for completing closure activities (not to exceed 180 days)
- A description of the units to be closed, and a site diagram identifying each unit
- The procedures to be used for closure
- The type and maximum volume of hazardous wastes stored in the unit at any time and the associated EPA hazardous waste numbers
- The type and amount of hazardous waste expected to be stored in the unit at the time closure activities are expected to begin
- The condition of the units at the time of the notification
- Plans for hazardous waste determinations on, and proper management and disposal of, stored wastes, unit components, investigation derived wastes, and decontamination wastes.

Within 45 days after completion of closure CEA, must provide a written report documenting the procedures used to comply with rule(s) 335-14-3-.03(5)(a)5, 335-14-6-.09(9), 335-14-6-.10(8), 335-14-6-.23(6), and/or 335-14-6-.30(3).

8.5 Transporters

CEA as the transporter of any hazardous waste must keep a copy of the manifest signed by the generator in accordance with what is listed below under "generator requirements" for a period of three years from the date the waste was accepted by the original transporter of the waste, or until CEA receives a signed copy from the facility that received the waste.

8.6 Operating Record

CEA must keep a written operating record. The following information must be recorded, as it becomes available and maintained in the operating record for three years.

- A description of and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by 335-15-5-Appendix I. This information must be maintained in the operating record until closure of the facility.
- The location of each hazardous waste within the facility and the quantity at each location. This information must be cross referenced to manifest document numbers if the waste was accompanied by a manifest. This information must be kept until closure of the facility.
- Records and results of waste analyses must be kept for three years.

- Summary reports and details off all incidents that require implementing the contingency plan must be kept for three years. Records and results of inspections must be kept for three years.
- Monitoring, testing, or analytical data, and corrective action where required by ADEM rules must be kept for three years.
- Closure cost estimates must be kept until closure of the facility.
- Waste minimization program must be reported annually and kept for three years.

9 Closure

9.1 Partial and Final Closure

Partial Closure, should it be necessary prior to final closure, will be made in accordance with the Closure Plan procedures and will be accomplished in the same manner as specified for Final Closure, using the methods, equipment, and procedures applicable to that unit of the facility. Final Closure will be accomplished in accordance with provisions outlined in this section.

9.2 Current Treatment/Storage Tanks Maximum Design Capacity

CAPACITIES TANKS			
ITEM	**QUANTITY**	**NET CAPACITY (gallons)**	**GROSS CAPACITY (gallons)**
Storage/Treatment Tanks	6	15,000	90,000
Total Capacities		15,000	90,000

CAPACITIES DRUM STORAGE NOTE: A 55 GALLON EQUIVALENT IS USED			
ITEM	**QUANTITY**	**NET CAPACITY (gallons)**	**GROSS CAPACITY (gallons)**
Building #1	1,840	55	101,200
Building #4	420	55	23,100
Building #2	1,780	55	97,900
Building #3	960	55	52,800
		Total Capacities	275,000

9.3 Closure Tasks

The following is a general outline of the tasks necessary to effect closure of this facility. Specific details of these tasks are covered in subsequent sections of this document. Methods for decontaminating this facility have been selected based on best available information at this time. However, the final engineering details of the Closure Plan will be submitted to ADEM/EPA in an Engineering Plan 45 days prior to proposed commencement of closure. This plan will include the results of a bench scale treatability study designed to validate the methods proposed for use in this document and to do a final engineering design on the closure. Additionally, other appropriate technologies will be evaluated in this study which may provide more thorough decontamination of the facility under conditions that are more appropriate with respect to worker safety and to the environment and that generate the least hazardous waste to be managed. Figure 1 summarizes the major closure tasks and the sequence in which they will be carried out.

9.4 Figure 1 Closure

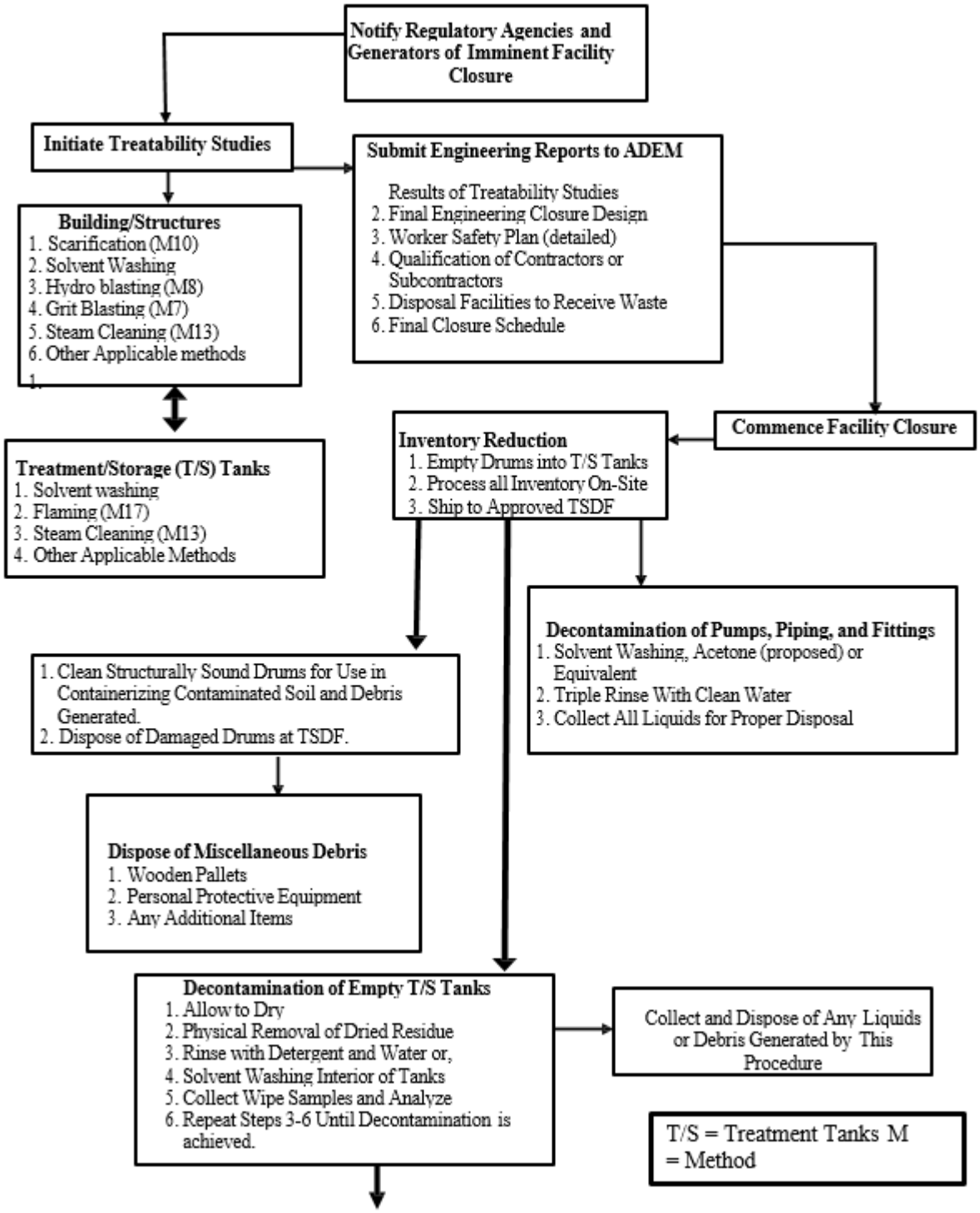
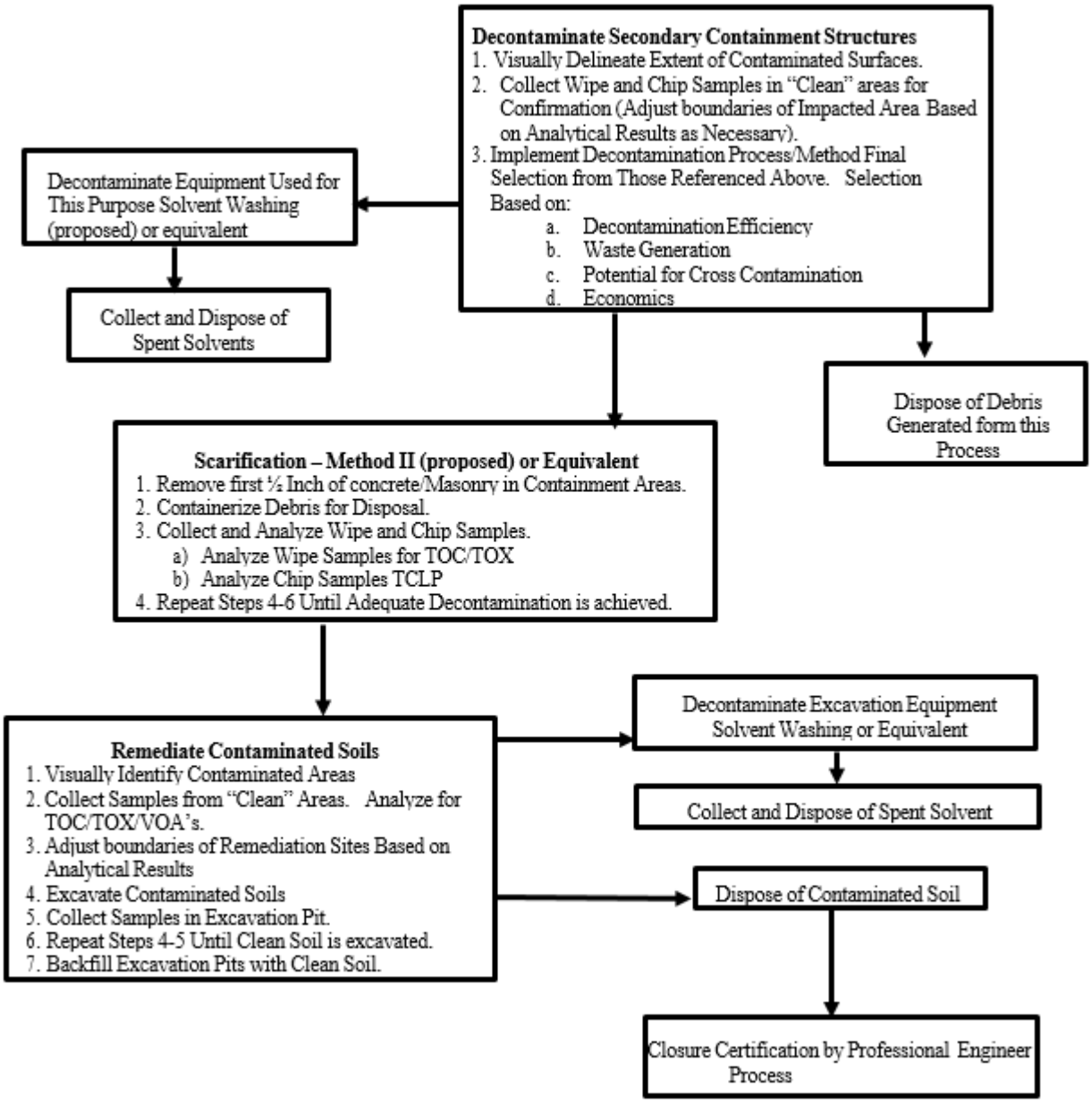


Figure 1 Closure (Continued)



9.5 Closure Details

9.5.1 Generators will be notified of imminent closure so that they may seek other sources of waste management. Bench scale treatability studies will be conducted to verify that the method and materials (i.e.; solvents, etc.) proposed in this plan are appropriate to the closure of this facility. Additionally, new technologies will be investigated for possible application in the closure of this facility. The results of this study will be submitted to ADEM 45 days prior to the implementation of this plan.

9.5.2 Submittal of a final Engineering Plan 45 days prior to the closure commencement to ADEM/EPA for review. This engineering plan will be consistent with actual and operating facility design as approved in the permit. The plan will ensure that any changes to the facility will be submitted to ADEM by means of a permit modification. Prior to submittal of this report, a bench scale treatability study will be conducted. The purpose of this study is to verify that the proposed decontamination/disposal method is adequate to perform the test. The Engineering Report will contain a detailed worker safety plan, the results of the Bench Scale Treatability Study, additional specification of these methods, as required, for decontamination and demolition, independent contractor qualifications and experience, and the identity of the disposal facilities which will receive the waste.

All tasks will be undertaken in strict accordance with worker Health and Safety standards provided in OSHA 1910 specifically:

- All workers will have attended an OSHA 24-hour HAZWOPER class provided by a qualified instructor or other source, and be fully acquainted with the facilities contingency plan.
- All workers involved in closure will wear appropriate levels of personal protective equipment (PPE), including, but not limited to, dermal and inhalation protection. The on-site Safety coordinator will determine the level of protection required for each task.
- An exclusion zone will be established around each work site so that the on-site Safety Officer and on-site Coordinator control access to and from this area. All workers will be required to enter and leave the work area via designated corridors.
- All wash waters generated from worker decontamination will be collected, sampled and analyzed, and, if appropriate, managed as a hazardous waste.

9.5.3 In order to affect a "clean closure" of this facility, the methods by which decontamination and removal of contaminated debris are accomplished will be largely dictated by the condition of the facility at the time of closure. However, selection of the most comprehensive, and cost-effective method by which closure will be accomplished will follow the guidelines established in appropriate and relevant EPA documents and guidance. The details of the closure plan will be dictated by the most cost effective, appropriate, and relevant technologies at the time of closure. The methods for decontamination of structures and the procedures for selection of methods as provided in the closure plan are supported by the referenced AP guidance document[1].

- Reduce inventory of waste as practical.
- Empty drums which are structurally sound will be cleaned by scraping both the inside and outside of the drum. These drums will then be shipped off-site for proper disposal, or

may be used to containerize contaminated soils and debris generated at closure. The material scraped from these drums will be collected and managed as a hazardous waste. Structurally unsound drums will be shipped off-site for proper disposal.

- All piping and pipe fittings in hazardous waste service will be cleaned to below method detection limits. A treatability study will be performed at the time of closure to confirm that the selected method of decontaminating the tank, TSP (trisodium phosphate) rinse is appropriate. Based on current information, the preferred method EWS Alabama, Inc. intends to use is a high-pressure water rinse followed by a rinse with a TSP and a final high-pressure water rinse. The wash waters will be collected, sampled and analyzed, and shipped offsite for appropriate disposal.
- Alternatively, a solvent washing method may be used if the TSP method described above is ineffective in decontaminating the piping ad pipefitting in hazardous waste service. The solvent used to decontaminate this equipment will be collected and managed as a hazardous waste.
- A qualified and experienced contractor will perform the decontamination of tanks in hazardous waste service. The contractor will supply certification of closure in accordance with ADEM approved methods. Residue generated from this task will be managed as hazardous waste if indicated by TCLP analysis of samples.
- The decontamination of vessels will be accomplished by either TSP rinse of solvent wash method. The interior of the tanks will be visually clean prior to collection of wipe samples from each tank.
- To confirm that the tanks have been sufficiently decontaminated, wipe samples will be collected from inside the tanks. From the individual tanks, three wipes will be collected from the tank walls at different strata along the tank walls and one sample collected from the floor of the tank. Each of the four samples collected from each tank will be collected from a 10cm x 10cm area using laboratory cleaned gauze pads. These four samples will be composited and the composited samples from each tank will be submitted for analysis for Appendix VII compounds.

1 **EPA Document Guide for Decontaminating Buildings, Structures, and Equipment at Superfund Sites EPA/600/2-85/028**

9.5.4 Decontamination of secondary containment structures will likely be necessary. The extent of the contamination will be determined from visual observations of these areas and analyses of a representative number of wipe and bulk/chip samples. The proposed method for decontaminating the structures is scarification. This method involves the removal of thin layers (i.e.; ~1/4 inch) of concrete from the surface areas where spills have caused staining. The resulting debris from this operation will be collected and analyzed for TCLP parameters and managed appropriately. Alternatively, solvent washing, or Hydroblasting/water washing may be performed. Each of these methods will be tested during the treatability study. Selection will be made on the basis primarily of effectiveness and residue/waste generation will be subject to ADEM approval. Economic considerations will also be a factor but may not be the deciding factor in the selection of a method(s), or any alternative methods. The resulting waste waters or used solvent will be collected and managed appropriately.

Demolition of the secondary containment system will only be necessary if decontamination procedures given above are ineffective in rendering these structures free from contamination. Decontamination procedures will be judged ineffective and demolition required if contaminated soil is found beneath the concrete. Soil samples will be collected from beneath the concrete if evidence of migration has been found (i.e.; ½ inch penetration into the concrete and/or if

cracks in the concrete have occurred). Should such action be necessary, the structure will be demolished. The debris from this activity will be sent to a waste management facility for disposition. Disposal of all other closure debris will be collected, sampled and analyzed for TCLP parameters and managed appropriately.

9.5.5 All visibly contaminated soils will be excavated and subjected to a TCLP analysis and managed appropriately. Following removal of all visibly contaminated soils, a grid will be constructed on each wall and on the floor of the excavation pit. A minimum of four grab samples of approximately 150 grams each will be collected at each grid node. The grab samples from each wall and the floor will then be composited to create five separate samples representing each of the five surface areas. Each of these five samples will be submitted to a qualified analytical laboratory and analyzed for TOC< TOX, and selected organic compounds. If analysis indicates remaining contamination above background, an additional 1-foot of soil will be excavated on each of the offending surfaces of the pit (i.e.; walls and floor). When this excavation is completed, more samples will be collected as previously described and submitted for analysis. This process will be repeated until analytical verification is obtained indicating that the site is free of contaminants. All analyses will be performed in accordance with appropriate SW-846 protocols and procedures by a qualified analytical laboratory. The contaminated soils excavated from this site will be subjected to TCLP analysis and managed appropriately. Excavated sites will be back-filled with clean soils procured from off-site locations.

9.5.6 Following the completion of the above tasks, soil samples will be collected around the perimeter of the production and storage areas of the facility and submitted for analysis to verify clean closure of the site. The samples will be collected as close to the regulated units as possible to the edge of the buildings and structures and a minimum of 10 samples will be collected from each area. The sample locations will be selected such that the areas of most probable contamination are included in the sampling strategy. One background soil sample will be collected from an offsite location that is topographically up gradient of the site. This off-site location will not be more than 100 yards from the property boundary, if practical (i.e.; not within roadways or roadway drainage ways). This background sample and those collected from the storage and process areas will be analyzed for Appendix VII constituents. If any on-site samples indicate Appendix VIII constituent levels above background, additional soil will be excavated until clean soil (i.e.; < background is encountered). Prior to back filling the excavation pit with clean soil, two additional samples will be collected from the immediate vicinity of this “hot spot”. One of these samples will include a surface soil sample collected three feet topographically down gradient form the original sample point and another sample will be collected from two feet beneath the pit. These samples will be analyzed for the parameters that were identified as being present in the original soil sample. This procedure will be repeated until analytical results are below background levels.

The data from sample analyses will be reviewed and any additional excavation/decontamination warranted will be performed. If warranted, additional samples will be collected and submitted for analysis. This procedure will be repeated until the standards for a RCRA clean closure have been satisfied.

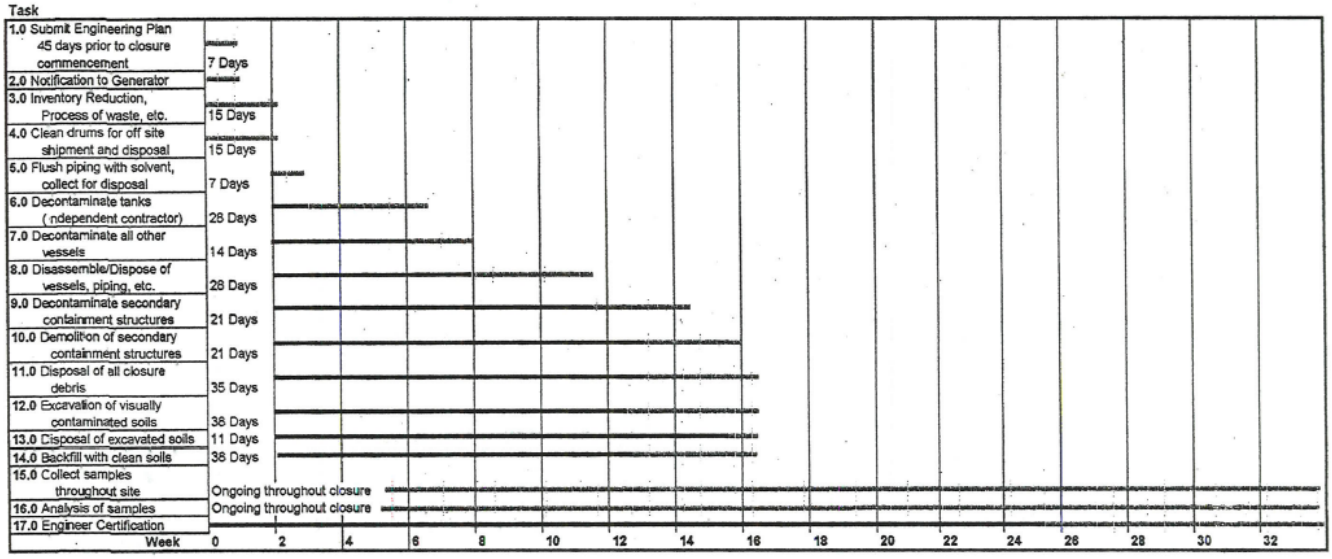
All data and details of closure will be reviewed by a qualified, registered professional engineer. A certification of clean closure will be submitted in accordance with regulatory requirements.

9.6 Schedule for Closure

Figure 2 presents the estimated schedule for final facility closure. Upon determination that closure it to take place, the facility will submit a final engineering plan to ADEM. The engineering plan will detail actual closure procedures for approval, and will be submitted to ADEM 45 days prior to the planned closure date. Generators will be notified of the imminent closure date and will be directed to seek other sources of waste management.

9.6.1 Figure 2 - Closure Schedule

Figure 2
Closure Schedule at 2 Week Graduation



9.7 Appendix I – Closure Cost Estimate Sheet

Tanks	Facility Volume			Unit Costs			Total Costs
Inventory Disposal	90,000 gal = 720,000 lbs.		720,000	$0.01	$/lbs.		$ 7,200.00
Off-site Trans.	Trips		18	$2,100.00	$/trip		$ 37,800.00
Labor Costs	Hours		1,000	$19.00	$/hour		$ 19,000.00
Analytical	Samples		24	$ 475.00	$/sample		$ 11,400.00
							$ -
Tank Subtotal							$ 75,400.00

Containers	Facility Volume			Unit Costs			Total Costs
Inventory Disposal	5,000 *containers = 2,577,143lbs		5,000	$150.00	$/each		$ 750,000.00
Shredded Pharmaceuticals in end dumps	2 end dumps = 60,000lbs		60,000	$0.18	$/lb.		$10,800.00
Tankers	200 *drum equiv. = 88,000		88,000	$0.01			$880.00
Off-site Trans.	Trips		56	$3,000.00	$/trip		$ 168,000.00
Labor Costs	Hours		250	$19.00	$/hour		$ 4,750.00
Container Subtotal							$ 934,430.00

Building & Structure Closure	Floor #			Walls(')			
Tank Farm	1,800	ft2	$ 0.40	464	ft2	$ 1.65	$ 1,485.60
Drum Storage	33,113	ft2	$ 0.40	670	ft2	$ 1.65	$ 14,350.70
Solids Building	10,571	ft2	$0.40	2370	ft2	$1.65	$ 8,138.90
Solids building addition	3,304	ft2	$0.40	included in solids calc.			$ 1,321.60
Bulk Storage	5,325	ft2	$0.40	1310		$1.65	$4,291.00
Receiving/Check-In	10,537	ft2	$0.40	1172	ft2	$1.65	$ 6,148.60
Analytical Costs	43 samples		43	$ 475.00	$/sample		$ 20,425.00
Soil Samples (5)	5 samples		5	$475.00	$/sample		$ 2,375.00
Building & Structure Subtotal							$ 58,536.40

		Current Closure Bond	$709,210
	The significant increase in closure cost estimate is due to additional container storage capacity, nearly doubled from 2,800 to 5,000 containers.		
Total		New Closure Bond	$ 1,068,366.40
		Adjusted for Inflation	$ 1,087,442.15

*** All containers are based on 55 gallon equivalent**

(#) cost per square foot for floor is $0.40/ft2

(') cost per square foot for wall is $1.65/ft2

9.8 Appendix II – Closure Cost Estimates

ROBBIE D. WOOD, INC.
P.O. Box 125
DOLOMITE, AL 35061
PHONE 205-744-8440

INVOICE 1142817
Date 06/06/2013

SHIPPER
FIGLAL
EWS OF ALABAMA,LLC
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

CONSIGNEE
LSGRIN
LONE STAR
3301 S COUNTY RD 150 WEST
GREENCASTLE, IN 46135

BILL TO
EWS
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

SHIPPING DATE 05/28/2013
SHIPPERS REF NO. 001954814GBF
ORDERED BY
DRIVER NAME CRE
TRUCK NO. 391
TRAILER NO. 1446V
BOX NO.
LOAD NO.

P.O.#/PAY#

DESCRIPTION	WEIGHT	MILES	RATE	CHARGES
HAZ. WASTE	0.0	1.0000	1625.0000	1625.00
FUEL SURCHARGE	Percent	1625.0000	31.0000	503.75

tanker

RECEIVED JUN 07 2013

THIS BILL IS PAST DUE ON	07/06/2013	PLEASE PAY THIS AMOUNT	$2,128.75

ICC REGULATIONS REQUIRE PAYMENT WITHIN 15 DAYS

Please DO NOT short pay this Invoice. Call(205-744-8440 ext 17) for a corrected Invoice.

ROBBIE D. WOOD, INC.

P.O. Box 125
DOLOMITE, AL 35061
PHONE 205-744-8440

INVOICE 1142817

Date 06/06/2013

SHIPPER
FIGLAL
EWS OF ALABAMA,LLC
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

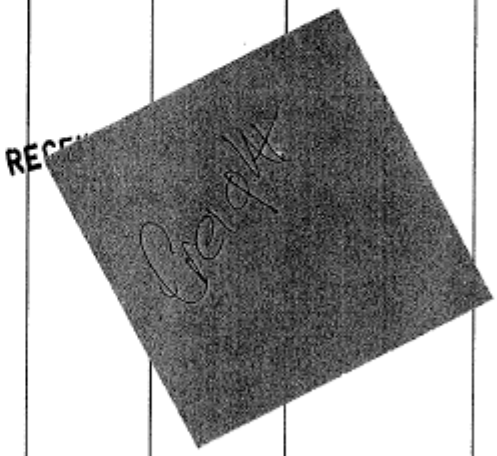
CONSIGNEE
LSGRIN
LONE STAR
3301 S COUNTY RD 150 WEST
GREENCASTLE, IN 46135

BILL TO
EWS
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

SHIPPING DATE	05/26/2013
SHIPPERS REF NO.	001954814GBF
ORDERED BY	
DRIVER NAME	CRE
TRUCK NO.	391
TRAILER NO.	1446V
BOX NO.	
LOAD NO.	

P.O.#/PAY#

DESCRIPTION	WEIGHT	MILES	RATE	CHARGES
HAZ. WASTE	0.0	1.0000	1625.0000	1625.00
FUEL SURCHARGE	Percent	1625.0000	31.0000	503.75



THIS BILL IS PAST DUE ON	07/06/2013	PLEASE PAY THIS AMOUNT	$2,128.75

ICC REGULATIONS REQUIRE PAYMENT WITHIN 15 DAYS

Please DO NOT short pay this Invoice. Call(205-744-8440 ext 17) for a corrected Invoice.

Buzzi Unicem USA

INVOICE NUMBER
78261

Buzzi Unicem USA
Greencastle WDF Facility
3301 S. Co. Rd. 150 W.
P.O. Box 486
Greencastle, IN 46135
(765) 653-8816

BILL TO:

EWS ALABAMA INC
402 WEBSTER CHAPEL ROAD
GLENCOE, AL 35905

Attention: Accounts Payable

Invoice Date: 01/11/13

JAN 2 1 2013

Thermal Destruction Services at Greencastle WDF Facility

Customer: EWS ALABAMA INC
Profile No: LS02596
Manifest No: 1954211
Weight: 39180 Pounds
Specific Gravity: 1.

Reference: 1954211

cost / lb for fuel

Item	Lab Measurement	SurCharge	Total
Load Base Price	$0.0100	$0.00	$391.80
Minimum Load Fee		$0.00	$0.00
BTU's per Pound	9,200	$0.000	$0.00
Moisture	26.90%	$0.000	$0.00
Chlorine	1.40%	$0.000	$0.00
Suspended Solids	12.00%	$0.000	$0.00
Heel Removal Fee		$0.00	$0.00
Rejection Fee			$0.00
Additional Charges			$0.00
Multiple Manifest Fee			$0.00

Terms: Net 30 days

Please Pay This Amount: **$391.80**

Comments:
Partial rejection- 260 gallons/2140 lbs approx

REMIT TO:
Buzzi Unicem USA
Greencastle - Alt. Fuels
23121 Network Place
Chicago, IL 60673-1231

SHIPPING DOCUMENTS AND CERTIFICATE OF DESTRUCTION/REUSE ENCLOSED. PLEASE FORWARD TO PROPER AUTHORITY.

A.R. Paquette & Co., Inc.

INVOICE No. 125839

INVOICE

PHONE: 386-736-1978
FAX: 386-736-2810

1400 E Int'l Speedway Blvd
De Land, FL 32724

SHIPPING DATE	12/29/2012	BILLING DATE	01/08/2013	PO #		B/L #	

SHIPPER-ORIGIN
L 1) EWS - Glencoe, AL 12/29/2012

CONSIGNEE - DESTINATION
U 2) Safety Kleen Solvent Center - Smithfield, KY 01/02/2013

CUSTOMER-BILL TO

EWS Alabama INC.
402 Webster Chapel Rd
Glencoe, AL 35905

COUNT	DESCRIPTION	WEIGHT	QUANTITY	RATE	AMOUNT
1 TL	Hazardous Waste		410Mi	2.150/M	881.50
	Fuel Surcharge		410Mi	0.580/M	237.80
	Manifest 002856803SKS				
	TRANS TO SAFETY KLEEN Solids 80 Drums				

THIS INVOICE DUE AND PAYABLE UPON RECEIPT

TOTAL 1119.30

CUSTOMER:

[11521]
EWS Alabama INC.
402 Webster Chapel Rd
Glencoe, AL 35905

----- PLEASE RETURN THIS PORTION WITH YOUR PAYMENT -----

LOAD NUMBER: 125839

INVOICE NUMBER: 125839

AMOUNT DUE: 1119.30

CREDIT TAKEN: _____

DATE PAID: _____

AMOUNT PAID: _____

MAIL PAYMENT TO:

NOTICE OF ASSIGNMENT
THIS INVOICE HAS BEEN ASSIGNED TO, AND MUST BE PAID DIRECTLY TO:
ADVANCE BUSINESS CAPITAL LLC
P.O. Box 610028
Dallas, TX 75261-0028
CLAIMS OR OFFSETS SHOULD BE DIRECTED TO 866-414-6600

safety-kleen
MAKE GREEN WORK

INVOICE

Page 1 of 2

Billing Account #	Service Account #	Invoice #	Invoice Date
609536	609536	59420423	11/09/12

Billing Address
EWS ALABAMA INC.
402 WEBSTERS CHAPEL RD
GLENCOE AL 35905-7150

Service Address
EWS ALABAMA INC.
402 WEBSTERS CHAPEL RD
GLENCOE AL 35905-7150

Branch Location
RC SMITHFIELD

Terms
Net 30

For Questions Call:

Service Date
11/07/12

PO Number	Department #	Department	Manifest #	Tax Status/#
N/A				

QUANTITY	PART#	TERM	SERIAL/PROFILE #	UNIT PRICE	UOM	SALES TAX	TOTAL
647.5	1044417 KY WASTE FEE SOLID 32375lbs @ $0.002/lb.	24		$0.1000	EA	$0.00	$64.75
1	876785 WATSE FLAMMABLE SLUDGES	6	40254256	$445.2000	CBX	$0.00	$445.20

PO Number	Department #	Department	Manifest #	Tax Status/#
NONE	36	55 GAL SOLID	002856799SKS	

QUANTITY	PART#	TERM	SERIAL/PROFILE #	UNIT PRICE	UOM	SALES TAX	TOTAL
72	875060 TSDF DISPERABLE SLUDGE & SOLIDS	6	2441573	$111.3000	DR	$0.00	$8,013.60

NOV 2 2012

Please be advised delinquent payments may result in a Late Payment Charge of $25.

safety-kleen

SAFETY-KLEEN SYSTEMS, INC
2600 North Central Expressway Ste 400
Richardson, TX 75080

Billing Account #	Service Account #	Invoice #	Invoice Date
609536	609536	59420423	11/09/12

PLEASE RETURN THIS PORTION WITH PAYMENT.
MAKE ANY ADDRESS CORRECTIONS BELOW.

Date Due	Amount Due
12/09/12	$9,247.55

00059420423000060953640000924755 6

000104 1
EWS ALABAMA INC.
402 WEBSTERS CHAPEL RD
GLENCOE AL 35905-7150

SAFETY-KLEEN SYSTEMS, INC.
PO BOX 650509
DALLAS, TX 75265-0509

SFK-INVOICE-BW

000104 000104 0001 0001

AES Environmental LLC
2100 Georgetowne Drive
Suite 303
Sewickley, PA 15143
(724) 933-4100

Invoice Number: **AES-152744**
Invoice Date: **02/04/2014**
Purchase Order #: _

Generator: **EWS Alabama, Inc.**
402 Webster Chapel Road
Glencoe, AL 35905

Work Order # 110166 T&D CC
Disposal

Date	Description	Quantity	Unit	Unit Price	Line Price
1/27/2014	002071874GBF-1 / MGT-38614 / DEBRIS W/ METALS - BULK / Rolloff/Dump	16.94	Ton	$76.00	$1,287.44

Work Order Subtotal	**$1,287.44**
Hazardous Waste Disposal Tax	$33.88
Environmental Assessment Fee	$109.43
Invoice Total	**$1,430.75**

Remit To: AES Environmental LLC
2100 Georgetowne Drive
Suite 303
Sewickley, PA 15143
(724) 933-4100

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2

AES Environmental LLC
2100 Georgetowne Drive
Suite 303
Sewickley, PA 15143
(724) 933-4100

Invoice Number: AES-152407
Invoice Date: 01/24/2014
Purchase Order #:

Generator: EWS Alabama, Inc.
402 Webster Chapel Road
Glencoe, AL 35905

Work Order # 109580 T&D CC
Disposal

Date	Description	Quantity	Unit	Unit Price	Line Price
1/9/2014	002071639GBF-1 / MGT-45752 / CAUSTIC LIQUID - BULK / Vac Trailer/Tank Truck	5,000.00	Gallon	$0.63	$3,150.00

Work Order Subtotal	**$3,150.00**
Hazardous Waste Disposal Tax	$232.92
Environmental Assessment Fee	$267.75
Invoice Total	**$3,650.67**

Remit To: AES Environmental LLC
2100 Georgetowne Drive
Suite 303
Sewickley, PA 15143
(724) 933-4100

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2

Environmental & Recycling Solutions

August 21, 2013

Pat Sullivan
EWS
402 Webster Chapel Rd
Glencoe, Alabama 35905

Re: building & structure closure cleaning

Dear Pat,

Environmental & Recycling Solutions (ERS) is pleased to provide EWS with the following proposal for cleaning of your facility in Glencoe, Alabama. This quote is for your facility closure plan. ERS will provide all equipment and personnel required to conduct this service within all applicable local, state and federal guidelines.

Rates

	Floor surface area ($0.40/sqft)	**Wall surface area** ($1.65/sqft)	**Total cost**
Tank Farm	1,800 sqft	464sqft	$ 1,485.60
Drum Storage	21,550 sqft	670 sqft	$ 9,725.50
Solids Building	10,571 sqft	2,370 sqft	$ 8,138.90
Bulk Storage area	3,600 sqft	0	$ 1,440.00
Stabilization Building	10,440 sqft	1,172 sqft	$ 6,109.80
			$26,899.80

EWS will provide access to all areas needed to perform work and a water source. EWS will provide any information requested on what materials are in the facility. Should the nature of the waste material change it is the responsibility of the generator to inform ERS of this change.

Payment terms are net thirty (30).

Should you have any questions concerning this quotation please contact me @ 334-737-3866.

We thank you for the consideration, and hope to hear from you soon.

Regards,
David Chunn
ERS
1902 Market Street
Opelika, Alabama 36801
Ph: 334-737-3866
Cell: 205-616-2436
Fax: 334-737-3868

10 Containment

10.1 Building #1

Measurements:

152 ft. + 120 ft. = 272 ft.^{2} x 60 ft. = 16, 320 ft2.

209 ft. + 125 ft. = 334 ft.^{2} x 60 ft. = 20, 040 ft.^{2}.
Total = 36,360 ft.

Lowest Wall Height – 4" = 0.33 ft.

Containment Volume = 36,360 ft.^{2} x 0.33 ft. = 11,998.8 ft.^{3} = 89,757 gallons*

Current Displacement of Containers = 1,840 Containers x 55-gallon equivalent = 101,200 gallons
10% of 101,200 = 10,120 gallons
10,120 gallons **does not** exceed containment capacity of 89,757 gallons

10.2 Building #4

Area 1 = 50 x 60 = 3,000 ft.^{2} (existing)
Area 2 = 71ft. 9inches x 34ft. = 2,439.5 ft.^{2} (existing) 10 ft. x 45 ft. = 450 ft.^{2}
10 ft. x 45 ft. = 450 ft.^{2}
10 ft. x 71.75 ft. = 715 ft. ^{2}
Total = 7,054.5ft. ^{2}

7,054.5ft.^{2} x 0.70 ft. (wall height average taken from existing measurements) = 4,938.15 ft.^{3}

Containment volume = 4,938.15 ft.^{3} = 36,939gallons*

New Displacement of Containers = 420 containers x 55 gallons = 23,100 gallons

10% of 23,100 gallons = 2,310 gallons
2,310 gallons **does not** exceed containment capacity of 36,939 gallons

10.3 Building #2

Existing Structure: 72.67 ft. x 145 ft. = 10,537.15 $ft.^2$ Containment

Area = 72.67 ft. x 145 ft. = 10,537.15 $ft.^2$

10,537.15 $ft.^2$ x 0.17 (berm height) = 1,791.31ft^3

Containment Volume = 1,791.31 $ft.^3$ = 13,397 gallons*

New Container Displacement = 1,780 (55-gal equivalent) = 97,900 gallons
10% of 97,900 gallons = 9,790 gallons

9,790 gallons does not exceed containment capacity of 13,397 gallons

10.4 Tank Farm

Small Area = 12.5 ft. x 12.25 ft. = 153.125 $ft.^2$ Large Area = 29 ft. x 59 ft. = 1,711 $ft.^2$

Total Area = 1,864.125ft^2 x 3ft. = 5,592.375 $ft.^3$

Containment Volume = 5,592.375 $ft.^3$ = 41,833 gallons*

Container Displacement = 15,000 gallons x 6 + 500 gal. Diesel tank + 500 gal. Gasoline tank =91,000 gallons 10% of 91,000 gallons = 9,100 gallons
9,100 gallons does not exceed containment capacity of 41,833 gallons

10.5 Building #3

Containment Area = 60 ft. x 60 ft. = 3,600 $ft.^2$

3,600 $ft.^2$ x 0.5 ft. = 1,800 $ft.^3$

Containment Volume = 1,800 $ft.^3$ = 13,464 gallons*
Container Displacement = (960 Drums @ 55 gallons) or 12 bulk containers = 52,800 gallons 10% of 52,800 gallons = 5,280 gallons
5,280 gallons does not exceed containment capacity of 13,464 gallons

*** Utilizing the following online conversion program:**
http://www.metric-conversions.org/volume/cubic-feet-to-us-liquid-gallons.htm?val=5999

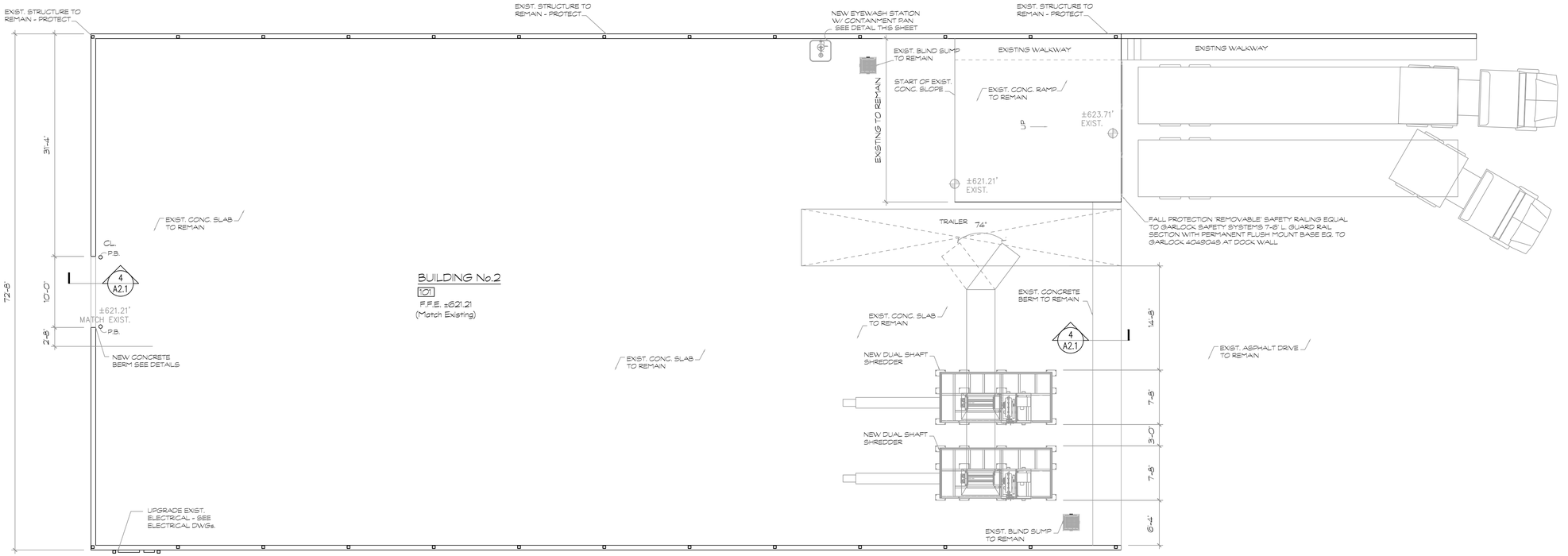
11 Proposed Changes

11.1 Building #4

A Class I MOD of the permit was approved on 5.31.2019 to relocate the shredder from Building #4 and relocate it into Building #2.

11.2 Building #2

Upon approval of a Class II MOD an additional shredder will be placed into building #2. Once approved the two units will be stationed side by side. Then the processed materials will be conveyed directly into an end dump trailer stationed within the containment of building #2. Once the trailer is full it will be stationed within the containment of Building #3 or sent to a 10-Day transfer facility until delivery to a permitted facility for final treatment/disposal.



FLOOR PLAN - BUILDING No. 2

SCALE: 1/8"= 1'-0"

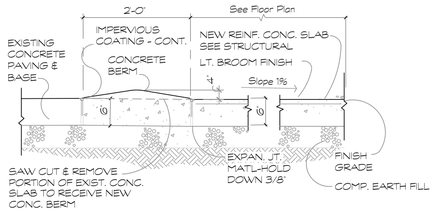
PLAN NORTH

FLOOR PLAN LEGEND:

- EXISTING EXTERIOR WALL: Existing Exterior Wall construction to remain. Protect Existing wall from damage during construction.
- INTERIOR CAST IN PLACE WALL: Reinforced Cast in place concrete Stabilization Vault Wall. See Structural For Reinforcing
- EXTERIOR CONCRETE WORK - See Civil Drawings
- ROOM NUMBER SYMBOL - See 'Schedule of Finishes'
- DOOR SYMBOL - See 'Schedule of Doors and Frames'
- X / AX — WALL SECTION MARKER - See 'Floor Plan For Locations'
- FLOOR PLAN NOTE SYMBOL - See 'Floor Plan Notes'
- ℄ CENTERLINE
- N.I.C NOT IN CONTRACT
- M.T. METAL THRESHOLD -
- F.E. FIRE EXTINGUISHER - See Plans & Details this Sheet
- D.S.B. DOWN SPOUT to BOOT - See Civil for Continuation
- H.B. HOSE BIB - New hose bid. connect to existing water supply.
- P.B. PIPE BOLLARD - See Pipe Bollard Details this sheet

AREA TABULATION:

• NEW CONSTRUCTION	
NEW CONSTRUCTION – INTERIOR	00 G.S.F.
NEW CONSTRUCTION – EXTERIOR	00 G.S.F.
TOTAL AREA – NEW CONSTRUCTION	00 G.S.F.
• RENOVATED CONSTRUCTION	
RENOVATED BUILDING	10,537 G.S.F.
COVERED ENTRANCES (0 s.f. @ 1/2 value)	0 G.S.F.
TOTAL AREA – RENOVATED	10,537 G.S.F.
• TOTAL AREA – NEW + RENOVATED:	10,537 G.S.F.

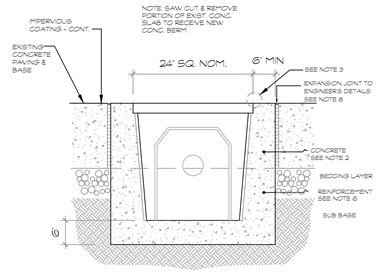


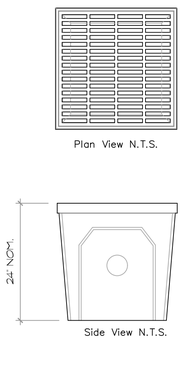
4 / A2.1 DETAIL at TYP. CONCRETE BERM at EXISTING PAVING

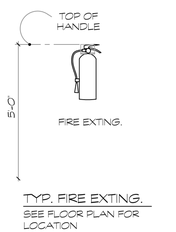
SCALE: 3/4"=1'-0"

2 / A2.1 TYP. SECTION @ CONCRETE PAD

SCALE: N.T.S.



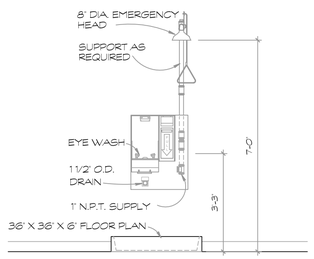




TYP. FIRE EXTING.
SEE FLOOR PLAN FOR LOCATION

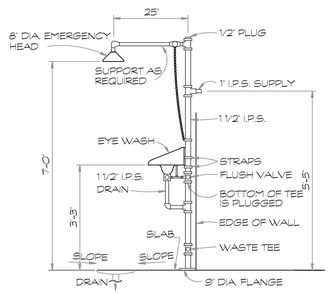
TYP. MOUNTING HEIGHTS

SCALE: 3/8"=1'-0"



WALL MOUNT - EMERGENCY SHOWER & EYE WASH DETAIL

SCALE: N.T.S. SEE FLOOR PLAN FOR LOCATION



EMERGENCY SHOWER & EYE WASH DETAIL

N.T.S.

NOTES:
1. It is necessary to ensure the minimum dimensions shown are suitable for the existing ground conditions. Engineering advice may be required.
2. A minimum concrete strength of 3000 PSI is recommended. The concrete should be vibrated to eliminate air pockets.
3. The finished level of the asphalt surround must be approx. 1/8" above the top of the catch basin edge.
4. Refer to manufacturer's latest installation instructions for complete details.
5. Concrete base thickness should match the slab thickness.
6. Rebar or steel mesh reinforcement may be required. Engineering advice may be required.
7. Outlet cap recommended for channel–sump box interface. (Factory or field core drill necessary.)
8. Expansion and crack control joints are recommended to protect the catch basin and the concrete surround. Engineering advice may be required.

The sump box shall be made from polymer concrete with a grey iron frame and grate equal to ACO Polymer Products, Inc., Chardon, Oh.

The sump box will be used in conjunction with 4"/8"/12" DRAIN trench drain (equal to ACO) and shall accept trench drain on all sides as shown above.

The sump box shall be 23 in. (582mm) maximum inside length with a 23 in. (582mm) maximum inside width. Sump box depth is 25.7 in. (652mm). The overall height is 26.8 in (680mm).

The complete sump box and trench drainage system shall be equal to ACO Polymer Products, Inc. Any deviation or partial system design and/or improper installation will void any and all warranties provided by manufacturer.

Sump box shall withstand loading to Load Class E (DIN 19 580). Grate shall be coordinated with contractor, manufacturer and architect. Sump box, Trench channel and grate shall be independently certified to meet the specified DIN 19580 load class.

Polymer Concrete shall have material properties of: compressive strength range between 14,000–14,500 psi; flexural strength between 3600–4500 psi; tensile strength of 1500 psi. The material water absorption rate shall not exceed 0.1% by weight and shall be resistant to prolonged salt exposure, repetitive frost cycles and chemically resistant to dilute acids and alkalis.

The system shall be installed in accordance with the manufacturer's instructions and recommendations.

1 / A2.1 DETAIL at TYP. SUMP

SCALE: 3/4"=1'-0"

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FLOOR PLAN & DETAILS

RENOVATIONS to BUILDING No.2
CLEAN EARTH of ALABAMA, INC
GLENCOE, ALABAMA

STATE OF ALABAMA
7375
DANIEL E. PARKER
GADSDEN, ALABAMA
REGISTERED ARCHITECT

PROJECT STATUS REVIEW	REVISED 04/11/2019
PROJECT NO. 19020	
DRAWN DEP	DRAWING NO. A2.1
CHECKED CJD	
DATE 03/15/19	2 OF 2