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RCRA Part B Permit Application

Submittal Date: November 24, 2014

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Hazardous waste Bureau



Advanced Chemical Treatment

6137 Edith Boulevard N.E.
Albuquerque, NM 87107
505-349-5220

RCRA Part B Permit Application

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Section 1 - Executive summary

1.1. General Description of ACTreatment

Advanced Chemical Treatment, Inc. (ACTreatment) is located at 6137 Edith Boulevard N.E., Albuquerque, NM 87107 in Bernalillo County (EPA ID# NMD002208627). ACTreatment manages a treatment, storage and disposal facility for hazardous waste products and also acts as the City of Albuquerque's household hazardous waste collection depot. Services include:

- Solid waste consolidation
- Liquid waste consolidation
- Lab pack chemical consolidation
- Universal/ E-Waste consolidation
- Household hazardous waste management
- Empty drum crushing

Wastes are sent for further recycling, incineration, landfill, wastewater treatment, transport, and/or disposal at a permitted TSDF.

1.2. General review of history and historical issues

The facility was originally constructed in 1983. In 1992, the southern half of the warehouse was built as an addition, along with the canopy on the west side of the building. The table below depicts the nature of activities from 1983 to present.

Period	Facility Operator	Land Owner	Nature of Facility Activity
1983 to 1987	RCI Properties	RCI Properties	Vacant Land
1987 to 2011	Rinchem Company, Inc.	RCI Properties	10 day transfer facility/Part B permitted TSDF
2011 to Present	Advanced Chemical Treatment, Inc.	RCI Properties	10 day transfer facility/Part B permitted TSDF

1.3. Description of submittal package

This renewal application includes the following:

- Part A, see **Figure 4 - EPA Form 8700 Site Identification**
- Part B – Required forms for application and other information, included below
- **ACTreatment Facility Operations Manual** – site specific SOPs as referenced in the application
- **Waste Analysis Plan (WAP)** – included in the **ACTreatment Facility Operations Manual**

Section 2 - Facility Description

Applicable Regulations - 49 CFR 270.14(b)(1)

2.1. Owner

The owner of the land upon which this facility is located is RCI Properties (Bill Moore), located at 6133 Edith Boulevard NE, Albuquerque, NM. Operator

The facility operator is Advanced Chemical Treatment, Inc. (ACTreatment). The NMED approved the permit modification for the transfer of the operator from Rinchem Company, Inc. to Advanced Chemical Treatment, Inc. on October 7, 2011 for the Rinchem Hazardous Waste Facility, now called Advanced Chemical Treatment, Inc. (ACTreatment)

2.2. Location

The facility is located at 6137 Edith Boulevard N.E., Albuquerque, NM 87107 in Bernalillo County. Note that EPA ID# NMD002208627 is currently linked to 6133 Edith Boulevard N.E., Albuquerque, NM 87107 and ACTreatment will keep the address of 6133 Edith Boulevard NE until the effective date of the permit renewal. At the time the new permit becomes effective, the facility will have a new address of 6137 Edith Boulevard NE and Rinchem will keep the 6133 Edith Boulevard NE address. Please refer to **Figure 1- Letter to John Kieling dated 11/11/11** for a copy of the letter referring to the address and EPA ID# change. In addition, the Bernalillo County Zoning Department authorized the address change and these letters are included as **Figure 2 - Letter from County of Bernalillo noting change of address for Lot 3.**

The facility conducts its operations on a leased 3.08 acre property which it shares with a sister company Advanced Chemical Transport, Inc. (ACT). ACTreatment operates on 1.75 acres which is leased by RCI Properties and ACT operates on 1.33 acres which is leased by Riccobene. The entire site is zoned M-1 and is situated in an urban area containing nearby commercial/light manufacturing facilities which are then bordered by mainly residential areas. The immediately adjacent properties includes a scrap metal recycler (to the northwest), an auto salvage yard (to the south), a provider of cement products (to the west), and a provider of chemical products (to the east). See **Figure 5 – General location map of ACTreatment Facility** and **Figure 6 - ACTreatment Site Layout and Storage Areas.**

The nearest surface water features are unnamed storm water drainage channels (generally dry, 0.3 miles to the east and west) that ultimately discharge into the Rio Grande River (2.5 miles west of the facility). In addition, there are two ~1 acre storm water infiltration basins (~200 feet north and adjacent to the south) which collect/infiltrate urban runoff from the surrounding urban area (but not the facility). The nearest residence is located ~0.1 miles southeast of the facility and there are

~67,000 residents within 1 mile. See **Figure 7 –Topographic map of ACTreatment and Surrounding Area (6000 ft scale)** and **Figure 8 –Topographic map of ACTreatment and Surrounding Area (200 ft scale)**

Figure 1- Letter to John Kieling dated 11/11/11



County of Bernalillo
Zoning, Building & Planning Department
111 Union Square St SE Ste 100
Albuquerque, NM 87102
Office (505)314-0350 Fax (505)314-0480

July 15, 2011

Rinchem
Attn: Lisa Gorgone
6133 Edith Blvd Ne
Albuquerque, NM 87107

Re: **CHANGE OF ADDRESS**

This letter is to serve notice of an address correction for: **Lot 4A-1 of Subdivision of Lot 4A Edith Land Company Cont 1.960 Ac**
Uniform Property Code: **101506131049110643**

FROM:

6133 Edith Blvd NE
Albuquerque NM 87107

TO:

6137 Edith Blvd NE
Albuquerque NM 87107

Address changes occur for the Safety, Health and Welfare of the residents of Bernalillo County. Please update your records to show this change.

If you have any questions, please contact our Permit Specialist, Wendy Barker directly at (505) 314-0362 or wbarker@bernco.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Beaman", is written over the word "Sincerely,".

Daniel J. Beaman
Permit & Application Processing Manager

Figure 2 - Letter from County of Bernalillo noting change of address for Lot 3



County of Bernalillo
Zoning, Building & Planning Department
111 Union Square St SE Ste 100
Albuquerque, NM 87102
Office (505)314-0350 Fax (505)314-0480

July 15, 2011

Rinchem
Attn: Lisa Gorgone
6133 Edith Blvd Ne
Albuquerque, NM 87107

Re: CHANGE OF ADDRESS

This letter is to serve notice of an address correction for: **Lot 3 Land Of Edith Land Co
The Major Portion Of Tract 2 MRGCD Map 32**
Uniform Property Code: **101506132848110644**

FROM:

6137 Edith Blvd NE
Albuquerque NM 87107

TO:

6133 Edith Blvd NE
Albuquerque NM 87107

Address changes occur for the Safety, Health and Welfare of the residents of Bernalillo County. Please update your records to show this change.

If you have any questions, please contact our Permit Specialist, Wendy Barker directly at (505) 314-0362 or wbarker@bernco.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Beaman", is written over a horizontal line.

Daniel J. Beaman
Permit & Application Processing Manager

2.3. Facility Size & Type for Fees

The facility is categorized as a Small Quantity Generator. Wastes generated at the facility may come from spill clean-up, unused cleaning and maintenance products and samples from the laboratory.

All wastes generated at the facility will be characterized according to the Waste Analysis Plan included in the ACTreatment Facility Operations Manual. The facility no longer runs an at-risk program and all at-risk waste was transferred offsite in 2013.

2.4. Facility Design

The facility contains a single 25,000 ft² warehouse building which has been subdivided into six operating areas (A-F) for waste receiving, bulking and segregated waste storage. Rooms C and D are divided by heat-based fire sensors that automatically close metal roll-up doors and the building is 4-hour fire rated. The warehouse building is constructed of concrete block and metal with concrete floors, steel I-beams frame and skylights. The southern portion of the warehouse has a covered loading dock with levelers and four (4), 10' x 10' overhead doors. Wall heights of the warehouse range from 11.5 to 16 feet and each room sealed with epoxy and the expansion joints in the floor are caulked to prevent possible contamination of the soil. Below is a description of each storage room which is designed to store hazardous waste for subsequent consolidation and transfer to off-site facilities (A-F):

- Room A Temperature controlled office space (engineered for hazardous waste storage if needed)
- Room B Temperature controlled for flammable and other compatible lab packs
- Room C Flammables, Empty Drums & Totes (DOT Class 6 toxics) and DOT Class 4.3 (Dangerous When Wet) lab packs
- Room D Flammables/Combustibles
- Room E Non-Regulated Material, Caustics/Bases and also toxics (DO Class 6)
- Room F Acids/Toxics/Oxidizers

All rooms have secondary containment provided by a 4" (approximate) curb or berm. In addition, the floor in all rooms is sloped away from the storage bays toward the aisles. Drum storage areas on the wall sides (but not the middle rack) of warehouses E & F have additional secondary containment. See Figure 3- ACTreatment Facility Evacuation Routes for facility layout.

The calculated containment capacities (and associated maximum theoretical storage capacities) are shown in Table 1 - Secondary Containment and Storage Capacities.

- Containment capacity (in gallons) is based on room size and curb height
- Length and width are indicated in feet, curb height is indicated in inches.
- Cubic feet converted to gallons using 7.48 gallon/ft³
- The actual curb height in all rooms is approximately 4". To be conservative, a 3" curb height was used to calculate containment
- Storage capacity based on requirement for 10% secondary containment capacity.

Table 1 indicates maximum hazardous materials storage capacities for individual warehouse areas. ACTreatment will limit storage of hazardous waste to a total of 150,000 gallons. Provisions for separation of incompatible materials are discussed in **4.3.1. Segregation of Incompatibles** and in **Facility SOP 8** of the **ACTreatment Facility Operations Manual**.

Table 1 - Secondary Containment and Storage Capacities

	Length (ft)	Width (ft)	Height (Inch)	Containment Capacity (gal)	Maximum Storage Capacity (gal)
A	25	50	3	2337.5	23,375
B	25	50	3	28,050	280,500
C	100	50	3	112,200	1,122,000
D	100	50	3	112,200	1,122,000
E	110	50	3	123,420	1,234,200
F	110	50	3	123,420	1,234,200
			Total	501,627.5	5,016,275

The facility also contains office space and a household hazardous waste drop-off center. In addition, there are paved parking/access ways and two small storm water collection/infiltration ponds. Vehicle access into the facility is either through a truck entrance or through an access way located on the north side of the facility.

(Applicable Regulations - 49 CFR 270.15)

2.5. Site Operations

2.5.1. Receiving (ACT)

Trucks bearing waste from ACT are backed into one of the five loading bays, (sloped to a blind sump) in front of the truck loading dock. The truck loading dock is an elevated covered concrete dock that runs along the east face of the facility and is used to process arriving waste loads. The loading dock is equipped with spill containment features and is located under an automatic foam-based fire suppression system.

2.5.2. Storage (ACTreatment)

Once processed for acceptance, containerized waste can be placed in one of six storage rooms within the facility segregated by waste type. Containers and palletized waste are placed in labeled storage positions on a tiered metal rack system or are stacked on the epoxy-coated floor (maximum of 3 high). Generally, wastes within the facility are placed along the outside walls and in the center. The individual storage positions are labeled with paint on the floor, are marked with overhead signs and/or have barcode labels. Empty containers may be placed along the south side (or in other areas where space is available) and empty drums may be accumulated within the facility paved parking area in preparation for transportation to off-site clients.

Refer to **Facility SOP 8** of the **ACTreatment Facility Operations Manual** for additional information

2.5.3. Bulking and Processing (ACTreatment)

Approximately 75% of the waste throughput at the facility undergoes some form of repackaging or bulking. Liquid wastes may be extracted from drums/containers and some small containers are consolidated into larger containers. Solid wastes may be sorted and repackaged into roll-off containers. Lab packs may be repacked/transferred into larger packaging (e.g. a transfer of a container into a 55-gallon drum from a 5-gallon pail). In general, the following types of processing or wastemanagement activities are conducted (see individual **Waste SOPs** in the **ACTreatment Facility Operations Manual** for procedures for specific waste streams)

Waste oil:

Waste oil that can be recycled is consolidated at the facility into totes or tank trucks and then disposed of at a permitted used oil recycling facility. Common Waste Oils that are managed at the TSD include:

- Used Motor Oils
- Industrial / Commercial lubricants
- Other Automotive products
- Dielectric fluids
- Other oily waste that can be recycled as oil

Aerosols:

Aerosols are received at the facility and consolidated as hazardous or universal waste or processed by puncturing. Common aerosol cans that are managed at the TSD include:

- Spray Paints
- Pesticides
- Cleaners
- Automotive products
- Medicines
- Other consumer goods packaged in aerosol cans

Batteries:

Batteries are consolidated and segregated at the facility per DOT regulations. Common types of Battery wastes that are managed at the TSD include but are not limited to:

- Lead-acid batteries
- Nickel-cadmium batteries
- Alkaline batteries
- Mercury containing batteries
- Lithium batteries

Electronic waste:

Electronic wastes are consolidated or palletized in a manner to prevent breakage. Common types of Electronic wastes that are managed at the facility include:

- Computers
- Monitors
- Printers

Labpacks:

Labpacks segregated by DOT hazard class and consolidated for transportation and disposal. Common Labpacks that are managed at the facility include laboratory and industrial chemicals that are spent or expired.

Lamps:

Lamps are consolidated into containers in a manner to prevent breakage or crushed using an EPA compliant bulb crusher. Common types of lamps that are managed at the facility include:

- Fluorescent lamps
- High pressure sodium lamps
- HID lamps of various types

Landfill Liquids:

Common Liquids that are consolidated at the facility as non-hazardous include:

- Non RCRA regulated liquids
- RCRA regulated liquids
- Corrosive bases and acids
- Other liquids that are accepted at the TSD that can legally be disposed of in a landfill

Landfill Solids:

Solids are consolidated, shredded or compacted into containers such as cubic yard boxes or roll-off containers. Common solids that are managed at the TSD include:

- Production trash
- Other debris with or without contaminants
- Lab trash
- Filters and medias

Liquid Fuels:

Liquid fuels are consolidated into totes or tank trailers. Common Liquid Fuels that are managed at the facility include:

- Laboratory or Industrial Solvent wastes
- Motor Fuels and lubricants
- Automotive products
- Other organic liquids that have greater than 5000 BTU fuel value.
- Additional information on evaluation of BTU values of combustible wastes is included in Attachment 3 - Justification of ACTreatment Fuels Consolidation Policy

Low BTU Organic Liquids:

Low BTU organic liquids are consolidated into totes or tank trailers. Common Low BTU organic Liquids that are managed at the facility include:

- Laboratory or Industrial Solvent wastes
- Water / Solvent Mixtures
- HPLC wastes
- Other organic liquids that have less than 5000 BTU fuel value.

Mercury:

Mercury wastes are consolidated into appropriate containers. Common Mercury Wastes that are managed at the facility include:

- Elemental mercury
- Laboratory / Industrial chemicals that contain mercury or mercury compounds
- Thermostats, thermometers and other devices that contain mercury
- Mercury containing debris from spill cleanup

Solid Fuels:

Solid fuels are consolidated, shredded or compacted into cubic yard boxes or roll-off containers. Common Solid Fuels that are managed at the facility include:

- Laboratory or Industrial Solvent wipes, trash, and debris
- Empty containers that once held flammable liquids
- Carbon media
- Other organic solids that may have greater than 5000 BTU fuel value

Drum-In-Drum-Out Waste (DIDO):

DIDO wastes are typically any wastes that may contain wastes that are not intended to be consolidated at the facility, or are not viable for consolidation due to the properties of the material. Common DIDO Wastes that are managed at the TSD include:

- Non-Pumpable Fuels
- Lean waters with high water concentrations
- Waste liquids packaged in small containers (vials, cartridges, devices)
- Wastes that may need additional processing at downstream TSDs
- Wastes that have no current consolidation program, but are not restricted from management at the TSD

2.5.4. 10-Day Transfer Facility (ACT)

ACT operates an outdoor 10-day transfer facility adjacent to the ACTreatment facility. Per the requirements in 40 CFR 263.12, manifested shipments of hazardous waste are stored in containers at this facility for 10 days or less during the normal course of transportation. The 10-day transfer facility is a separate business unit from ACTreatment and is used for wastes being transported by ACT to ACTreatment or other TSD facilities.

The 10-Day Transfer Facility generates traffic of approximately 8 vehicles per day. The vehicles enter/exit the transfer facility by way of Edith Blvd to a service road

(Rinchem Road) that leads to the facility through an industrial neighborhood. Employee operated vehicles have access to the facility via remote control operated automatic gate. Contract haulers and other non-employee vehicles must park on the service road and sign in at the front office to gain access to the 10-day yard.

Additional information on facility traffic patterns is provided in **Section 2.6. Traffic pattern: volume, controls, and access.**

2.5.5. Household Hazardous Waste (ACT)

A portion of the facility loading dock is used by ACT employees as a permanent Household Hazardous Waste Collection Center (HHWCC). The Center is open to the public (City of Albuquerque residents) every Monday, Wednesday, Friday and Saturday for at least six (6) hours each day. Waste brought to the Collection Center is managed in a manner consistent with comparable wastes generated by commercial enterprises and regulated under the Resource Conservation and Recovery Act (RCRA). ACT provides the following services for HHW brought to the collection center:

- Receiving/collection/segregation;
- Analysis for compatibility of unknowns;
- Packaging/bulking, including labeling and manifesting;
- Transportation in accordance with DOT and EPA regulations;
- Management (recycling/reuse/reprocessing, treatment or disposal) of HHW at an EPA permitted or equal facility; and
- Disposal of non-hazardous wastes (empty containers, packaging materials, etc.) at the City of Albuquerque's landfill, if not recyclable.

Paint related material is consolidated with compatible waste streams within the TSDF and shipped off-site for fuels consolidation.

The following waste streams are consolidated on the north loading dock and shipped offsite to permitted TSDFs.

- Aerosols (paint, pesticides, lubricants, oils)
- Alkaline batteries
- Corrosive acids (cleaners and descalers)
- Corrosive bases (cleaners and disinfectants)
- Flammable toxics (liquid pesticides and herbicides)
- Fluorescent lights
- Lead acid batteries
- Mercury (thermometers, thermostats)
- NiCd batteries
- Paint related material (flammable)
- Solid oxidizers (pool chemicals)
- Toxic solids (solid pesticides and herbicides)
- Used oil

The following waste categories are not accepted into the collection center:

- Radioactive wastes
- Biomedical wastes

- Explosives/reactive wastes
- Compressed gases (exclusive of aerosol cans)

ACT also provides a "Materials Reuse" area. Materials brought to the HHWCC and which appear to be usable, appear to be in the original container, have a complete label, are not restricted use or banned pesticides, or are not known to be carcinogenic materials are made available to the public free or charge. The material reuse is open to the public the same hours as the collection center.

2.6. Traffic pattern: volume, controls, and access

(Applicable Regulation - 49 CFR 270.14(b)(10))

There is only one street approach to the facility. This entrance is located 600 feet west of Edith Blvd. All the trucks accessing the facility approach from Edith Blvd. The trucks turn west onto a road and utility easement. This paved road is a private easement. The Access road surface is three inches of asphalt over a six inch gravel base course which translates into a load-bearing capacity of fifty 18,000-pound single-axle loads per day over twenty years. The trucks proceed on this easement until they reach the gate of the facility. See **Figure 5 – General location map of ACTreatment Facility** and **Figure 6 - ACTreatment Site Layout and Storage Areas**

A stop sign and a sign informing the drivers that they must report to the office before proceeding further is at the gate to the loading/unloading dock. After receiving permission from the office, the gate is opened and the driver is escorted to the dock.

After leaving the facility by way of the easement, the trucks stop at a stop sign that is located at the end of the easement immediately before turning onto Edith Blvd.

Various commercial motor vehicles are used to transport wastes. These vehicles can be tank, flat or van trailers or box vans. The maximum axle weight for any of these vehicles is 16,250 pounds and maximum gross weight is 80,000 pounds. Approximately 60 commercial vehicles per month enter and leave the facility.

The increase in storage capacity included in this permit application (compared to the previous permit) will increase traffic flow onto the access easement road by a maximum of 2 to 3 truckloads per day on average. The increase in vehicle traffic will have minimal impact on traffic in the area of the facility and in the adjacent industrial area. In-bound and outbound loads will be scheduled to minimize congestion

2.7. Security procedures and equipment

(Applicable Regulations - 49 CFR 264.14, 49 CFR 270.14(b))

Advanced Chemical Treatment, Inc. (ACTreatment) employs a number of measures to ensure adequate security in order to assure the protection of the facility from entry by unauthorized personnel, livestock and wildlife. ACTreatment employs the following security procedures:

2.7.1. Alarm System:

The facility has a security alarm system that is connected to each perimeter door, there are glass breaks sensors on windows, and motion detectors in office area. This security alarm system is monitored 24 hours a day by an outside security company. The alarm code is changed whenever an employee leaves the company.

2.7.2. Fence:

A fence encompasses the entire facility, including the 10-day transfer station managed by Advanced Chemical Transport, Inc. The fence is a chain link fence constructed with razor wire or barb wire along the top of the entire fence. The fence is in good repair and completely surrounds the active portion of the facility.

2.7.3. Gates:

All gates are kept closed and locked during non-working hours. During working hours, the gates are kept closed when vehicles are not entering or exiting the facility. The main truck gate has a sign informing non-facility employees to check in with the office before entering. All critical locks are changed when an employee leaves the company or a key is lost.

2.7.4. Warning Signs:

A sign with the legend, "**DANGER - UNAUTHORIZED PERSONS KEEP OUT**" and "**PELIGRO-PERSONAS SIN AUTORIZACION NO ENTRADA**" is posted at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion. The signs are legible from a distance of 25 feet.

2.7.5. Visitor/Contractor/Vendor Check-In:

All visitors, contractors, vendors, etc. are required to sign-in at the front office prior to entrance into the facility. Visitors, contractors and vendors are escorted during the course of their visit.

2.8. Air Permits

In the spring of 2013 Angela Lopez (angelalopez@cabq.gov; 505-768-1962) with the City of Albuquerque visited the facility to review the fuel consolidation process. In August 2013, ACTreatment submitted an application for an air quality permit for this process. The permit application has been assigned to Paul Puckett (ppuckett@cabq.gov; 505-767-5627) and as of the date of submission of this permit is still under review.

Section 3 - General Inspection Schedule

(Applicable Regulations 49 CFR 270.14(b)(5), 49 CFR 264.15 (b), 49 CFR 264.174)

3.1. Intent:

Advanced Chemical Treatment, Inc. (ACTreatment) personnel conducts regular inspections of all equipment and structures to prevent, detect, or respond to environmental or human health hazards.

3.2. Schedule:

The Operations Manager or his designee is responsible for carrying out and documenting the facility inspections in accordance with **Facility SOP 17** in the **ACTreatment Facility Operations Manual**.

As described in **Facility SOP 17**, inspections are conducted on a daily, weekly, monthly and annual basis (the term daily refers to one operating day). Each inspection notes any repairs that are needed and assures that they are completed. If facility personnel cannot carry out the repairs, outside contractors will be brought in and repairs will continue to be indicated on applicable inspection reports until completion. The inspection logs are maintained as part of the facility's operating log for at least three years

3.3. Corrective Actions:

The inspections include checking for leaks, drum condition, safety and emergency equipment status and containment conditions, etc. Inspectors may also make any other observations concerning the facility they think are warranted. Inspectors will recommend and document any remedial action that is appropriate. If remedial action is required, the supervisor has been authorized to respond immediately to correct any noted deficiencies.

3.4. Inspection Recordkeeping

The inspection reports are maintained at the facility for a period of three years.

Section 4 - Waste Analysis and Management

4.1. Chemical and Physical Analyses of Hazardous Wastes

(Applicable Regulations §270.14(b)(2))

Advanced Chemical Treatment, Inc. will collect information such as chemical and physical characteristics of a waste to be accepted at the facility prior to the waste being shipped. This will include completion of a waste profile sheet, compiling generator knowledge and collection of a representative sample to generate laboratory analytical data (if generator knowledge is not sufficient), or some combination thereof. The purpose of this phase is to determine if the waste is acceptable by the facility based on comparison of the waste characteristics to permit, process, and regulatory constraints.

The analysis will be repeated as necessary to ensure that it is accurate and up to date. At a minimum, the analysis will be repeated when ACTreatment is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed. In addition, the analysis may be repeated when the evaluation of incoming shipments indicates that the waste received at the facility does not match the waste designated on the accompanying manifest or profile.

Specific acceptance criteria and evaluation procedures for each type of waste collected at ACTreatment are indicated in the **Waste Category Standard Operating Procedures** (SOPs) included in the **ACTreatment Facility Operations Manual**. General procedures for hazardous waste analysis are included in the ACTreatment **Waste Analysis Plan (WAP)** also included in the **ACTreatment Facility Operations Manual**

4.2. Waste Analysis Plan (WAP)

The ACTreatment facility **Waste Analysis Plan (WAP)** is included in the **ACTreatment Facility Operations Manual**

4.3. Precautions for Prevention of Accidental Ignition or Reaction of Ignitable, Reactive or Incompatible Wastes

(Applicable Regulations §264.17, 270.14(b)(9))

The facility has a combination of building design and procedural measures to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes. The first precaution taken shall be to ensure that the hazardous waste received is what is described on the generator's profile and the manifest accompanying the waste so that it can be stored properly. The procedures to accomplish this are described in the **waste category SOPS** and the **facility WAP** included in the **ACTreatment Facility Operations Manual**

Containerized hazardous waste materials shall be stored only in closed DOT approved containers. These containers will not be opened unless sampling or repackaging is necessary. Procedures for handling containers as well as procedures for consolidation

are included in Facility SOPs and Waste Category SOPs in the ACTreatment Facility Operations Manual.

The storage areas for the waste containers are inside the building, as described in Section 2.4. Facility Design and in Section 4.3.1. Segregation of Incompatibles.

4.3.1. Segregation of Incompatibles

In order to decrease hazards caused by storing incompatible wastes, the building is designed to allow physical separation and secondary containment of incompatible materials. The storage portion of the facility is separated into six sections by stem walls and cinderblock walls. Each area has sloped floors to contain any material within that area should a spill or leak occur. There are also ramps in between the storage areas to keep any spilled or leaked waste within the storage area. Routine inspections of containers and container storage areas shall be conducted to allow site personnel to detect a spill or leak quickly and to identify potential problems before they occur.

Table 2 - Segregation of Incompatible Hazard Classes

DOT Hazard Class	Room B	Room C	Room D	Room E	Room F
2.1	✓	✓	✓		
2.2	✓	✓	✓	✓	✓
2.3	✓				
3	✓	✓	✓		
4.1	✓	✓	✓		
4.2	✓	✓	✓		
4.3	✓	✓	✓		
5.1					✓
5.2					✓
6.1	✓	✓	✓	✓	✓
8 (acid)					✓
8 (base)				✓	
9	✓	✓	✓	✓	✓
Non DOT	✓	✓	✓	✓	✓
✓ = storage allowed					

All storage containers holding hazardous waste that is incompatible with other wastes and materials (based on DOT Hazard Class) will be separated and protected from these wastes and materials by cinderblock walls, stem walls and ramps between the storage areas. Specific storage areas for hazard classes are shown in Table 2, above.

Consistent with 40 CFR 264.176, no reactive or ignitable wastes are stored within 50 feet of the ACTreatment property line. Where necessary (where the ACTreatment storage warehouses are closer than 50 feet from the property line) the 50 foot distance is marked on the warehouse floor and no reactive or ignitable wastes are stored in the indicated areas.

Procedures for storage of hazardous wastes are included in **Facility SOP 8** in the **ACTreatment Facility Operations Manual**.

4.3.2. Sources of Ignition

Sources of ignition shall be eliminated by several means. First, containers of flammable and combustible materials are stored in designated areas, away from electrical equipment. Second, electrical outlets are not located in the areas where these wastes are stored. The rooms are lit by sunlight coming through skylights in the roof, warehouses A & B are temperature controlled, otherwise there are no heating systems in the warehouse areas. Third, all wiring and electrical equipment used around the waste storage areas (such as in the temperature control rooms and on the docks) is explosion proof. The forklifts are designed and rated to prevent ignition of flammable vapors.

Smoking, and use of matches or lighters are not be permitted anywhere in the facility. "NO SMOKING" signs are posted at all entrances to the waste storage and handling areas, on facility perimeter fencing and other prominent places throughout the facility. Welding, cutting and other high temperature operations shall not be allowed near the vicinity of the waste storage and handling areas unless proper precautions and planning are done and the work is approved by compliance.

4.3.3. Required Aisle Space

An aisle space of no less than three feet is maintained to allow the unobstructed movement of personnel, fire protection equipment and spill control equipment. The arrangement of containers in the staging area shall always be configured to meet aisle space requirements.

Section 5 - Description of Procedures, Structures or Equipment for Hazard Prevention

(Applicable Regulations §264.30-37, §270.14(b)(8), §270.14(b)(8)(i), §270.14(b)(8)(ii), §270.14(b)(8)(iii), §270.14(b)(8)(iv), §270.14(b)(8)(v), §270.14(b)(8)(vi))

5.1. Design and operation of facility

The ACTreatment facility is designed, constructed, maintained, and operated in a manner that minimizes the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

- The facility has designated H-occupancy storage areas for storage of flammable materials and all storage rooms have secondary containment in sufficient quantity to minimize the likelihood of release to air, soil or surface waters in the unlikely event of a spill (as described in **Section 2.4. Facility Design.**
- Waste materials are stored in designated areas, based on their hazard class (as described in **Section 4.3.1. Segregation of Incompatibles** to minimize the likelihood of incompatibles reacting with each other
- As described in the **ACTreatment Facility Operations Manual**, waste containers are received, inspected, stored and managed as described in Facility and waste-category-specific standard operating procedures (SOPs) in order to minimize the likelihood of an spills or releases
- A Contingency plan is in effect to ensure rapid response to any spills or releases (see **Section 6 - ACTreatment Facility Contingency Plan**) and regular inspections are conducted (as described in **Section 3 - General Inspection Schedule**) to ensure that all applicable facility safety systems are available and able to function as intended in the event of a spill or a release

5.2. Prevention of Hazards during Unloading Operations

Unloading hazards shall be reduced through procedures, structural features and equipment used at the facility. Containerized wastes shall be unloaded and loaded only at the truck dock which is equipped with mechanical dock levelers. All wastes that enter or leave the facility shall be handled over the sloped area of the loading dock. Small trucks shall drive over the berm onto the dock from the east side of the facility. Longer trucks shall back up to the dock, parking on the sloped and bermed concrete apron to the south. Both areas can contain a 1000-gallon spill.

The facility will maintain hand trucks and forklifts for hazardous waste container carrying. Forklifts will be operated as described in the ACT Powered Industrial Truck (PIT). Generally accepted practices for container handling will be used. In particular, loads will never be lifted higher than is necessary to minimize the risk of breakage should the load fall

5.3. Prevention of Flooding and Run-Off from Waste Handling Areas

Flooding of the hazardous waste storage building shall be prevented by the land under the building which is elevated five feet above the surrounding land. This allows any

rain that might land near the building to flow away from, instead of towards, the building. Also, the building's roof is sloped and is equipped with a gutter system which allows the rainwater to flow from the facility in a southwesterly direction into the catchment ponds.

Prevention of runoff from the waste handling areas shall be accomplished in several ways. The storage area for the hazardous waste is situated inside the building over sealed concrete floors that are sloped and bermed so in the event of a spill or other release the material is contained inside the building. All other waste handling areas such as the docks are paved with concrete which provide secondary containment.

5.4. Prevention of Water Supply Contamination

All the measures discussed in the section above will decrease the chance of contamination of water supply. All waste handling will be performed over concrete and any spills or leaks that do occur shall be cleaned up immediately. Also, the road around the building slopes to the west so that rainwater flows into the drainage ponds in the back of the building. This prevents the mixing of rainwater and any potential contamination from trucks at the dock.

5.5. Mitigation of Effects of Equipment Failures and/or Power Outage

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

- The storage section of the facility is lighted only by skylights. The docks are equipped with explosion-proof electrical lighting. The forklifts are equipped with floodlights which allow for their safe use in the dark.
- In an emergency, pull stations will be operable since the electronic alarm system is battery powered. Verbal announcements will also be effective means of warning employees to evacuate.
- Emergency exit signs shall be self-illumination and visible without electric power.

5.6. Prevention of Undue Exposure of Personnel to Hazardous Waste

Training is the key to the prevention of employee exposure. All personnel at the facility shall be trained in procedures for properly performing facility operations including handling hazardous wastes and responding to emergency situations. Included in the training shall be instruction in the use of personal protection equipment and the location and use of safety showers and eyewash units which are located at strategic points throughout the warehouse. Additional information on the employee training program is included in Section 7 - Personnel Training Program.

Specific procedures for handling different waste categories are included in the ACTreatment Facility Operations Manual, however, in general:

- Engineering controls, such as working in well ventilated areas like the open loading dock areas, will be used wherever possible
- Work practices such as keeping containers closed, minimizing spills and releases, good housekeeping, etc. will be followed as described in waste category SOPs

- All employees shall be provided with protective equipment which includes, but is not limited to, eye protection, steeled-toed boots, respirators, protective overalls and chemically resistant aprons.
- At a minimum, employees and visitors shall be required to wear eye protection in the warehouse, on the docks and in the yard at all times.
- Respirator use will be consistent with requirements in the ACT Respiratory Protection Program (RPP)

Additional procedures for receiving, inspecting, storing and consolidating specific categories of hazardous waste are included in **Facility and Waste Category Standard Operating Procedures** in the **ACTreatment Facility Operations Manual**.

5.7. Prevention of Releases to the Atmosphere

In addition to the precautions taken at ACTreatment to prevent releases, other ACT business units that transport waste to the ACTreatment facility implement additional preventive procedures before the hazardous waste is transported. Before loading the containers of waste at a generator's site, the containers are checked for soundness, proper closure and labeling, and compliance with U.S. Department of Transportation (DOT) standards. Any damaged containers that might leak or burst during transporting or unloading are not accepted for transportation.

All containers are inspected as they are received at the facility for proper labeling and closure and to ensure they are structurally sound. At the facility, all containers will be kept closed except as necessary for business activities such as inspection, sample collection, consolidation.

In the event of a leak or a spill, all liquids will be retained in the curbed, secondary containment within each room. Specific response procedures are described in the facility contingency plan, however releases to the atmosphere will be minimized through prompt response to any spills or releases in order to minimize quantities that could evaporate or be released to atmosphere.

Section 6 - ACTreatment Facility Contingency Plan

(Applicable Regulations §264.50-56, §270.14(b)(7))

ACTreatment has implemented a contingency plan designed to minimize hazards 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, and around Advanced Chemical Treatment's (ACTreatment) facility. The provisions of the plan shall be carried out immediately whenever there is a threat to human health or the environment, as described below.

The complete **ACTreatment Facility Contingency Plan** is included as **Facility SOP 12** in the **ACTreatment Facility Operations Manual**.

6.1. Facility Identification and General Information

Advanced Chemical Treatment, Inc.

6137 Edith Boulevard N.E., Albuquerque, NM 87107

505-349-5220

6.2. Type of Facility

On-site storage and consolidation of hazardous waste in containers, tanks, roll-offs and similar containers.

6.3. Copies of Contingency Plan

A copy of the contingency plan and all revisions to the plan are:

- Maintained at the facility; and
- Submitted to all local police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services.

6.4. Arrangements with Local Authorities

In the event of an emergency at the facility, appropriate local authorities have toured the facility and are familiar with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility and possible evacuation routes.

- Bernalillo County Fire Department shall assume primary emergency authority and will coordinate with the City of Albuquerque.
- Lovelace Women's Hospital has been notified and contracted with the facility and is familiar with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

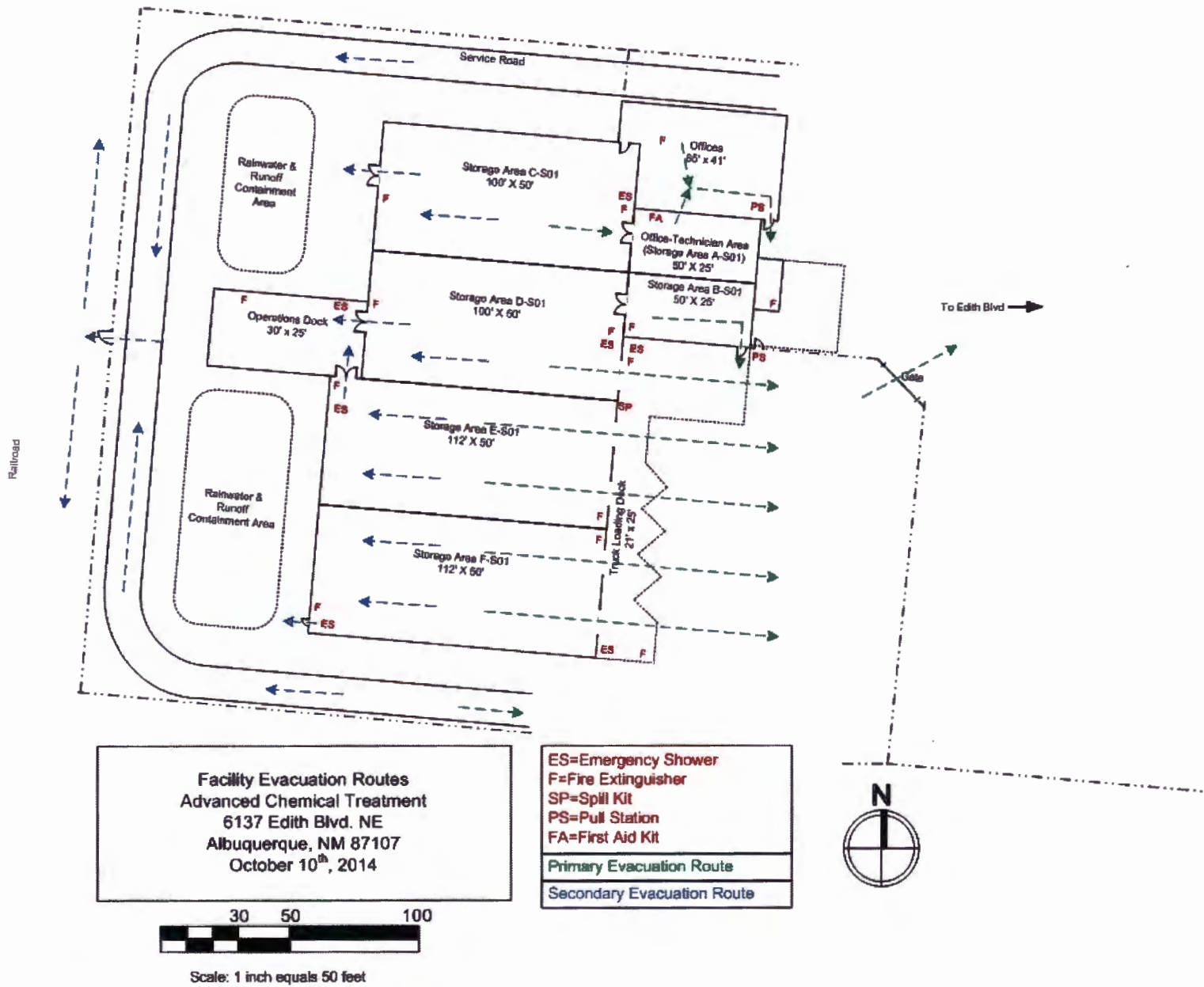
6.5. Amendment of Contingency Plan

The complete **ACTreatment Facility Contingency Plan** is included as **Facility SOP 12** in the **ACTreatment Facility Operations Manual**.

The contingency plan will be reviewed, and immediately amended, if necessary, whenever:

- 1.** The facility permit is revised;
- 2.** The plan fails in an emergency;
- 3.** 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;
- 4.** The list of Emergency Coordinators changes; or
- 5.** The list of emergency equipment changes.

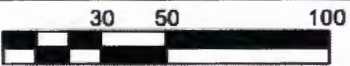
Figure 3- ACTreatment Facility Evacuation Routes



Facility Evacuation Routes
 Advanced Chemical Treatment
 6137 Edith Blvd. NE
 Albuquerque, NM 87107
 October 10th, 2014

ES=Emergency Shower
 F=Fire Extinguisher
 SP=Spill Kit
 PS=Pull Station
 FA=First Aid Kit

Primary Evacuation Route
 Secondary Evacuation Route



Scale: 1 inch equals 50 feet

Section 7 - Personnel Training Program

Applicable Regulations §264.16, §270.14(b)(12))

The primary objective of the facility's training program is to instruct employees in the practices, procedures and rules regarding safe operation in accordance with applicable State and Federal regulations. The training program requires training in safety, proper transport and response to hazardous waste emergencies. These classes are conducted in-house by an employee trained in hazardous waste management procedures and/or outside training providers. The instruction is in the form of classroom instruction and on-the-job training.

All new employees who manage hazardous waste shall complete the initial training courses within six months from their date of hire or from the date of transfer of job assignment. Personnel shall not work unsupervised in their positions until they have completed the training. Annually, all personnel who manage hazardous waste must participate in a minimum of eight hours of refresher/review of the initial training.

All TSD employees will receive initial OSHA HAZWOPER training as required under subpart (p) and subpart (q) of 29 CFR 1910.120 and annual refresher training, as described below, as well as DOT hazardous materials transport training. Courses which satisfy all or part of the training include, but are not limited to:

- Initial Facility Orientation
- OSHA HAZWOPER Hazardous Material Technician (29 CFR 1910.120(q)(6))
- OSHA HAZWOPER TSD Worker (29 CFR 1910.120(p)(7))
- OSHA 8-hr HAZWOPER Refresher
- DOT Hazardous Materials Transportation Training

The training shall consist of lectures, discussions, examinations and on-the-job training.

See **ACTreatment Facility Operations Manual, Facility SOP 2** for more information on employee training

Section 8 - Seismic & 100-Year Flood Plain Compliance

8.1. Seismic Standard Compliance

(Applicable Regulations §264.18(a), §270.14(b)(11) , §270.14(b)(11)(i), §270.14(b)(11)(ii) , §270.14(b)(11)(ii)(A), §270.14(b)(11)(ii)(B))

Bernalillo County is listed in Appendix VI of the New Mexico Hazardous Waste management Regulations 20.4.1.500 NMAC, incorporating 40 CFR §264.18(a), The facility must demonstrate compliance with the seismic standard found in the New Mexico Hazardous Waste Management Regulations 20.4.1 NMAC.

No faults having had displacement in Holocene time are present within 3,000 feet of the Facility. **Figure 9 - Local Geology of ACTreatment** is a copy of the Section of a published geological map of Albuquerque and Bernalillo County entitled, "Geology of Albuquerque Basin" by Vincent C. Kelly, 1977. It shows the different stratigraphic units found in the Albuquerque basin. This map also shows the faults that are present in the basin. The Facility is identified on the map. As one can see, there is a fault within 3-4 miles of the Facility. This coincides with the type of geology found under the facility. The facility is located over alluvial deposits.

8.2. 100-Year Flood Plain Compliance

(Applicable Regulations §264.18(a), §270.14(b)(11) , §270.14(b)(11)(i), §270.14(b)(11)(ii) , §270.14(b)(11)(ii)(A), §270.14(b)(11)(ii)(B))

Using a Flood Insurance Rate Map of the city of Albuquerque, the facility is not located in an area subject to a 100-year flood. A copy of the map used for this determination is shown in **Figure 7 -Topographic map of ACTreatment and Surrounding Area (6000 ft scale)**. The facility is identified on the map shows that the lot which encompasses the Facility touches the boundary for the 100-year flood plain but is not part of it. The nearest flood plain is an area of 100-year shallow flooding where depths are from one to three feet. Prior to construction, the land on which the building is located was elevated five feet above the surrounding land to alleviate any problems that could be caused by a flood. Even if a 100-year flood occurred, the building would be high enough above the nearby flood plain to prevent damage or water contamination. In this way, the possible hazard caused by bordering a 100-year flood plain is eliminated.

Section 9 - Closure Plan

9.1. Background

Location: 6137 Edith Boulevard N.E., Albuquerque, NM 87107

EPA ID No.: NMD002208627

This closure plan provides for the closure of the hazardous waste storage warehouse with a total storage capacity of 150,000 gallons of hazardous waste.

9.2. Purpose

The facility will be closed in accordance with the closure requirements of 40 CFR 264.110 through 40 CFR 264.115. Closure of the facility will be carried out in accordance with the steps outlined in this plan and applicable Federal and State regulations. An estimated closure schedule and closure cost estimate is attached. The closure plan and closure cost estimate, as part of the permit, will be kept on site. Copies of closure cost estimate financial assurance documentation will be provided upon final approval of this permit application, based on permit approval conditions.

During remediation, all hazardous wastes will be removed and any hazardous waste residues will be reduced to levels that are protective of human health and the environment (as determined by an evaluation from a New Mexico registered PE based on generally accepted professional practices), thereby achieving clean closure and eliminating the need for further maintenance and care. Upon completion of closure activities, the need for further maintenance will be eliminated.

The facility has developed this generalized closure plan for decontamination at the site. The closure plan includes the following:

- The estimated expected year of closure and a closure schedule.
- An estimate of the maximum inventory of waste in storage at any time during the active life of the facility for development of the closure cost estimate.
- Notification procedures.
- A description of how and when the facility will be finally closed.
- Procedures for certification of closure activities by the facility and an independent professional engineer.
- Closure Performance Standard

9.3. Estimated Expected Year of Closure & Closure Schedule

There is no anticipated closure date at this time. At the time of closure, the facility will only perform a full closure and not a partial closure.

9.4. Maximum Inventory of Wastes

The maximum containerized hazardous waste inventory at the facility is 150,000 gallons. See **Section 2.4. Facility Design** for storage quantity limits. General storage guidelines are described in **Facility SOP 8** of the **ACTreatment Facility Operations Manual**.

9.5. Notification & Schedule of Closure

The facility will notify the Department in writing of any intent to close the facility at least 45 days before the facility begins implementation of closure activities.

Within 90 days of receiving the final volume of hazardous wastes, the facility will remove all hazardous wastes from the site in accordance with the approved closure plan. The facility will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of waste or upon NMED approval of the closure plan and procedures, whichever is later. NMED may approve a longer period if the facility demonstrates that:

- The activities necessary to remove wastes or close the facility will, of necessity, take longer than 90 or 180 days, respectively, to complete;
- The facility has the capacity to receive additional wastes;
- There is likelihood that a person other than Advanced Chemical Treatment will recommence operation at the site within one year;
- Closure of the facility is incompatible with future use of the site. In this case, the facility will take all steps necessary to prevent threats to human health and the environment.

The facility may petition the agency for an extension to the closure period to ensure that the facility has achieved clean closure levels that are protective of human health and the environment.

9.6. Closure Activities

Facility closure will be implemented in accordance with this plan and any subsequent modifications.

The container storage area within the warehouse is used to store/accumulate/consolidate containers of hazardous and non-hazardous wastes. At the beginning of closure, or before, the waste shall be removed and transported to disposal facilities using the same procedures and practices that are employed in the facility's day-to-day business. As described in the ACTreatment **Facility Operations Manual**

The secondary containment structure (concrete floor, curbing and collection trenches) will be inspected and decontaminated in accordance with the following general procedures. Unless otherwise specified, the decontaminated containment structure will be left in place at the time of closure.

- The containment area dike and slab area will be inspected by an independent Professional Engineer for the presence of cracks, fissures, missing seals, etc. If found, visible cracks or gaps in the containment shall be sealed prior to commencement of cleaning to prevent migration of rinsate outside of the containment area. In addition, if unsealed cracks are fully penetrating, the underlying soil will be sampled during closure as described below.
- The containment dike will be swept to remove loose debris, and then washed with a detergent- water solution and high-pressure spray and then triple rinsed. The

quantity of wash water will be kept to a minimum to reduce the amount required for treatment/disposal. Decontamination of the concrete will be repeated as necessary, until any contamination is reduced to acceptable levels (as determined by an evaluation from a New Mexico registered PE based on generally accepted professional practices)

- The decontamination wash water will be collected and evaluated for hazardous waste characteristics. Based on that evaluation, the rinsate will either be managed as a hazardous waste and transported for treatment/disposal at an appropriately permitted TSDf or characterized as non-hazardous and treated or disposed in accordance with applicable regulations.
- As described below, soil in potentially contaminated areas (such as under any unsealed, fully penetrating cracks) will be evaluated for contamination.
- As an alternative, the decontaminated concrete containment structure may also be demolished and transported offsite for recycling or disposal.

9.7. Disposal or Decontamination of Equipment, Structures & Soils

Equipment used for decontamination will be cleaned along with and within the respective secondary containment structures. Small consumable equipment (e.g. mops, rags, disposable PPE, etc.), which cannot be cleaned will be evaluated for hazardous waste characteristics. Based on the results of this evaluation, these wastes will then either be containerized, managed as a hazardous waste and disposed of at a permitted TSDf, or characterized as non-hazardous waste and treated or disposed in accordance with applicable regulations.

The facility does not anticipate that heavy equipment, such as cranes and backhoes, will come into contact with hazardous wastes. However, if necessary, heavy equipment will be cleaned by scraping, brushing and/or using a pressure washer with a non-phosphate detergent/water solution with tap water rinse. The wash/rinse water and any other wastes will be collected and evaluated for hazardous waste characteristics. Based on this evaluation, these wastes will then either be containerized and managed as a hazardous waste and disposed of at a permitted TSDf or characterized as non-hazardous waste and treated or disposed in accordance with applicable regulations.

9.8. Soil Sampling During Closure

During the closure process, all structures will be evaluated by a New Mexico registered PE to identify any cracks or gaps in concrete or asphalt or any other potential areas that would allow wastes to migrate to underlying soils.

Soil samples will be collected and evaluated as determined by an evaluation from a New Mexico registered PE based on generally accepted professional practices. In general soil samples will be collected from areas immediately beneath any cracks or gaps noted by the professional engineer

Where necessary, samples will be collected from native soils below the cracked or otherwise suspect areas using U.S. EPA's SW-846: *Test Methods for Evaluating Solid Waste – Physical and Chemical Methods*.

It is anticipated that soil samples will be analyzed for constituents representative of the toxicity characteristic waste codes listed in the facility permit (total VOCs, SVOCs and RCRA metals). Background samples will be collected for comparison.

Soil sample results will be compared to applicable closure criteria (as established by a New Mexico registered PE, based on generally accepted professional practice). If soil sample results indicate the presence of contamination above applicable closure criteria, the identification, characterization, and remediation of any contamination that may exist beneath the containment areas will be described in a work plan prepared by a New Mexico registered PE, based on generally accepted professional practice. The work plan will be submitted to the NMED for review and approval.

9.9. Certification of Closure

When closure is completed, both the facility owner and operator as well as a qualified independent Professional Engineer registered in New Mexico will submit to the NMED a formal certification that the facility has been closed in accordance with the approved closure plan. The certification will be sent by registered mail.

The closure certification will be presented in a Closure Certification Report, which will be prepared in accordance with applicable portions of 40 CFR 264.115. Information contained in the closure report will include a brief site history, site plan, closure field notes, description of decontamination procedures, photos, soil sampling locations, laboratory analytical reports, tabular summaries of analytical results, volume of wastes and/ or wash water removed and copies of waste manifests. Any deviations from the approved closure plan will also be documented in the report. The Closure Certification Report will be submitted within 60 days of completion of the closure activities.

9.10. Certificate of Liability Insurance

The Hazardous Waste Facility Certificate of Liability insurance is included in **Figure 11 - Certificate of Liability Insurance**. This certificate is issued by Endurance Specialty Insurance Company under policy number FEI-EIL-20469-00, issued and effective 10/17/14.

9.11. Closure Cost Estimate and Proof of Financial Coverage

The following is the most recent closure cost estimate for Advanced Chemical Treatment, Inc. as required by 20.4.1.500 NMAC, incorporating 40 CFR 264.142. The cost estimate is based on hiring a third party to close the Facility at a point in the Facility's active life when the extent and manner of its operation would make closure most expensive.

The closure cost estimate is based on aggregate waste storage capacity as described in **Section 2.4. Facility Design**

Table 3- ACTreatment Facility Closure Cost Estimate

Description	Quantity	Units	Cost per Unit	Total Cost
Cost for removal/disposal/treatment of:				
Maximum amount of waste at facility at any given time	150,000	gallons	\$ 1.81	\$271,500
Wash water/residue generated from closure activities	1000	gallons	\$ 0.50	\$500
Disposal of contaminated walls	10	cu. Yd.	\$ 35.00	\$350
Disposal of contaminated concrete flooring or asphalt	10	cy. Yd.	\$ 35.00	\$350
Disposal of contaminated soil	10	cy. Yd.	\$ 35.00	\$350
Sampling costs:				
Soil (coring labor and analysis)	10	Soil Samples	\$ 500.00	\$5,000
Waste profile samples from wash water residue	2	Water Samples	\$ 95.00	\$190
Closure certification costs:				
Inspection by NM Registered P.E.				\$2,250
Preparation of closure report by NM Registered P.E.				\$2,250
Other costs:				
Labor costs for decontamination	4 people x 5 days x 8 hours	hours	\$ 20.00	\$3,200
Labor costs for sealing cracks, fissures, missing seals, etc	1 person x 4 hours	hours	\$ 20.00	\$80
Equipment rental costs (power washer, PPE, jack hammer, hand tools, etc.)				\$1,500
Labor costs for Demo	3 people x 5 days x 8 hours	hours	\$ 20.00	\$2,400
Equipment rental costs (power washer, PPE, jack hammer, hand tools, etc.)	5 days	Excavator w/ breaker	\$ 500.00	\$2,500
				\$292,420

Proof of financial coverage will be provided upon approval of this permit application, based on the terms of approval.

9.12. Closure Plan Amendments

If an amendment needs to be made to this Closure Plan, the facility will submit a written notification to the NMED for a permit modification at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the closure plan. If an unexpected event occurs during the final closure period, the facility will request a permit modification no later than 30 days after the unexpected event. It should therefore be noted that the Sampling Plan presented below is only an example, because as operations within the facility and testing procedures and requirements change, so shall the facility's sampling plan through Permit Modification, to reflect these changes.

A permit modification must be submitted whenever:

- Changes in operating plans or facility design affect the closure plan, or
- There is a change in the expected year of closure, if applicable, or
- In conducting closure activities, unexpected events require a modification of the approved closure plan

9.13. Survey Plat

Not applicable to the facility.

9.14. Post-Closure Care and Use of Property

Not applicable to the facility.

9.15. Post-Closure Plan; Amendment of Plan

Not applicable to the facility.

9.16. Deed Restrictions and Post-Closure Notices

Not applicable to the facility.

9.17. Certification of Completion of Post-Closure Care

Not applicable to the facility

Section 10 - Summary of Pre-Application Meeting

On Thursday, August 28, 2014, Advanced Chemical Treatment held a public meeting to provide information about the application and respond to citizen comments and questions.

10.1. Evidence of Public Notice:

- Newspaper Advertisement:

An order confirmaiton and a mailing notice from the Albuquerque Journal order are included in **Attachment 4 - ACTreatment Pre-Application Public Meeting as Figure 12 - Albuquerque Journal order confirmation and Figure 13 - Albuquerque Journal order mailing notice**

- Broadcast Media Announcement

A Receipt / Purchase Confirmation from Clear Channel as well as broadcast information are included in included in **Attachment 4 - ACTreatment Pre-Application Public Meeting as Figure 14 - Clear Channel Receipt / Purchase Confirmation and Figure 15 - Clear Channel broadcast information**

- Visible and accessible sign in front of the facility

Photos of visible and accessible signage is included in **Attachment 4 - ACTreatment Pre-Application Public Meeting as Figure 16 - Photos of visible and accessible signage**

- Notice to the permitting agency and appropriate units of State and local government

An example of the letters sent to the Bernalilo County Environment Environmental Health Office, City of Albuquerque Environmental Health Department, Facility Mailing List as provided by the NMED and John Kieling, Chief, Hazardous Waste Bureau, New Mexico Environment Department in **Attachment 4 - ACTreatment Pre-Application Public Meeting as Figure 17 - Copy of letter sent to the permitting agency and appropriate units of State and local government**

10.2. Summary of public information meeting

- A copy of the PowerPoint presentation given at the meeting is included in **Attachment 4 - ACTreatment Pre-Application Public Meeting as Figure 19 - PowerPoint presentation given at the meeting**

10.3. Attendees at public information meeting

- A copy of sign-in-sheet from the meeting is included is included in **Attachment 4 - ACTreatment Pre-Application Public Meeting as Figure 18 - Sign-in-sheet from the meeting.**

10.4. Comments received at public information meeting

- No comments were received

Section 11 - Information requirements for Solid Waste Management Units (SWMUs)

Advanced Chemical Treatment does not operate a "regulated unit" as defined by 40 CFR 264.90(a)(2); which is 'a surface impoundment, waste pile, and land treatment unit or landfill that receives hazardous waste after July 26, 1982'.

Section 12 - Groundwater monitoring requirements

Groundwater monitoring requirements as required in 40 CFR §270.14(c) do not apply because Advanced Chemical Treatment does not operate a "regulated unit" as defined in **Section 11 - Information requirements for Solid Waste Management Units (SWMUs)**.

Section 13 - Consideration under Other Federal Laws

(Applicable Regulations §270.3(a) – (f))

13.1. National Historic Preservation Act of 1996

This Act is not applicable to this facility since the property is not a designated site nor will existing operations affect any listed site.

13.2. Endangered Species Act

Continuing operations at this site will not affect any endangered species.

13.3. Wild and Scenic Rivers Act

Continuing operations at this site will not have a direct adverse impact any national wild and scenic river.

13.4. Coastal Zone Management Act

This act is not applicable since the facility is not located in a coastal zone.


13.5. Fish and Wildlife Coordination Act

This act is not applicable since operation of the facility will not result in the impoundment, diversion, or modification of any body of water.

Attachment 1 - EPA 8700 Site Identification

Figure 4 - EPA Form 8700 Site Identification

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

<p>SEND COMPLETED FORM TO: The Appropriate State or Regional Office.</p>	<p>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>		
<p>1. Reason for Submittal</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input checked="" type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in <u>one or more months</u> of the report year (or State equivalent LQG regulations)</p>		
<p>2. Site EPA ID Number</p>	<p>EPA ID Number N M D 0 0 2 2 0 8 6 2 7 </p>		
<p>3. Site Name</p>	<p>Name: Advanced Chemical Treatment, Inc.</p>		
<p>4. Site Location Information</p>	<p>Street Address: 6133 Edlth Boulevard NE</p> <p>City, Town, or Village: Albuquerque County: Bernalillo</p> <p>State: New Mexico Country: USA Zip Code: 87107</p>		
<p>5. Site Land Type</p>	<p><input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
<p>6. NAICS Code(s) for the Site (at least 5-digit codes)</p>	<p>A. 5 6 2 2 1 1 C. 5 6 2 9 9 8 </p> <p>B. 5 6 2 1 1 2 D. </p>		
<p>7. Site Mailing Address</p>	<p>Street or P.O. Box: 6133 Edlth Boulevard NE</p> <p>City, Town, or Village: Albuquerque</p> <p>State: New Mexico Country: USA Zip Code: 87107</p>		
<p>8. Site Contact Person</p>	<p>First Name: Shawn MI: B Last: Moudy</p> <p>Title: General Manager</p> <p>Street or P.O. Box: 6133 Edlth Boulevard NE</p> <p>City, Town or Village: Albuquerque</p> <p>State: New Mexico Country: USA Zip Code: 87107</p> <p>Email: smoudy@advancedchemical.net</p> <p>Phone: 505-349-5222 Ext.: Fax: 505-349-5232</p>		
<p>9. Legal Owner and Operator of the Site</p>	<p>A. Name of Site's Legal Owner: RCI Properties-Bill Moore Date Became Owner: 1986</p> <p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>Street or P.O. Box: 6133 Edlth Boulevard NE</p> <p>City, Town, or Village: Albuquerque Phone: 505-345-3655</p> <p>State: New Mexico Country: United States Zip Code: 87107</p> <p>B. Name of Site's Operator: Advanced Chemical Treatment, Inc. Date Became Operator: 10/18/11</p> <p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		

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

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

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

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

Y N

1. Generator of Hazardous Waste
If "Yes", mark only one of the following - a, b, or c.

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

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

Y N

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

Y N

3. United States Importer of Hazardous Waste

Y N

4. Mixed Waste (hazardous and radioactive) Generator

Y N

5. Transporter of Hazardous Waste
If "Yes", mark all that apply.

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

Y N

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

Y N

7. Recycler of Hazardous Waste

Y N

8. Exempt Boiler and/or Industrial Furnace
If "Yes", mark all that apply.

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

Y N

9. Underground Injection Control

Y N

10. Receives Hazardous Waste from Off-site

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

Y N

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

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

Y N

2. Destination Facility for Universal Waste
Note: A hazardous waste permit may be required for this activity.

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

Y N

1. Used Oil Transporter
If "Yes", mark all that apply.

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

Y N

2. Used Oil Processor and/or Re-refiner
If "Yes", mark all that apply.

- a. Processor
- b. Re-refiner

Y N

3. Off-Specification Used Oil Burner

Y N

4. Used Oil Fuel Marketer
If "Yes", mark all that apply.

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

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

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

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

❖ You can **ONLY** Opt into Subpart K if:

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

Y N

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

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

Y N

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

11. Description of Hazardous Waste

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

REFER TO	ATTACHED	TABLE 1				

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

REFER TO	ATTACHED	TABLE 2				

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

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

12. Notification of Hazardous Secondary Material (HSM) Activity

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

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

13. Comments

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

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Shawn Moudy, General Manager	
	Bill Moore, Property Owner RCI Propertie	

**TABLE 1: FEDERAL HAZARDOUS WASTE CODES ACCEPTED AT ADVANCED CHEMICAL
TREATMENT**

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
D001	1,331	T	S01
D002	500	T	S01
D003	500	T	S01
D004	25	T	S01
D005	25	T	S01
D006	25	T	S01
D007	25	T	S01
D008	25	T	S01
D009	25	T	S01
D010	25	T	S01
D011	25	T	S01
D012	25	T	S01
D013	25	T	S01
D014	25	T	S01
D015	25	T	S01
D016	25	T	S01
D017	25	T	S01
D018	25	T	S01
D019	25	T	S01
D020	25	T	S01
D021	168	T	S01
D022	34	T	S01
D023	25	T	S01
D024	25	T	S01
D025	25	T	S01
D026	25	T	S01
D027	25	T	S01
D028	369	T	S01
D029	25	T	S01
D030	25	T	S01
D031	25	T	S01
D032	25	T	S01
D033	25	T	S01
D034	25	T	S01
D035	25	T	S01
D036	25	T	S01
D037	25	T	S01
D038	25	T	S01
D039	25	T	S01
D040	25	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
D041	25	T	S01
D042	25	T	S01
D043	25	T	S01
F001	1100	T	S01
F002	1100	T	S01
F003	1100	T	S01
F004	500	T	S01
F005	575	T	S01
F006	25	T	S01
F007	25	T	S01
F008	25	T	S01
F009	25	T	S01
F010	25	T	S01
F011	25	T	S01
F012	25	T	S01
F013	25	T	S01
F014	25	T	S01
F015	25	T	S01
F016	25	T	S01
F017	25	T	S01
F018	25	T	S01
F019	25	T	S01
F020	25	T	S01
F021	25	T	S01
F022	25	T	S01
F023	25	T	S01
F024	25	T	S01
F025	25	T	S01
F026	25	T	S01
F027	25	T	S01
F028	25	T	S01
F029	25	T	S01
F030	25	T	S01
F031	25	T	S01
F032	25	T	S01
F033	25	T	S01
F034	25	T	S01
F035	25	T	S01
F036	25	T	S01
F037	39	T	S01
F038	25	T	S01
F039	25	T	S01
K001	25	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
K002	25	T	S01
K003	25	T	S01
K004	25	T	S01
K005	25	T	S01
K006	25	T	S01
K007	25	T	S01
K008	25	T	S01
K009	25	T	S01
K010	25	T	S01
K011	25	T	S01
K012	25	T	S01
K013	25	T	S01
K014	25	T	S01
K015	25	T	S01
K016	25	T	S01
K017	25	T	S01
K018	25	T	S01
K019	25	T	S01
K020	25	T	S01
K021	25	T	S01
K022	25	T	S01
K023	25	T	S01
K024	25	T	S01
K025	25	T	S01
K026	25	T	S01
K027	25	T	S01
K028	25	T	S01
K029	25	T	S01
K030	25	T	S01
K031	25	T	S01
K032	25	T	S01
K033	25	T	S01
K034	25	T	S01
K035	25	T	S01
K036	25	T	S01
K037	25	T	S01
K038	25	T	S01
K039	25	T	S01
K040	25	T	S01
K041	25	T	S01
K042	25	T	S01
K043	25	T	S01
K044	25	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
K045	25	T	S01
K046	25	T	S01
K047	25	T	S01
K048	25	T	S01
K049	25	T	S01
K050	25	T	S01
K051	25	T	S01
K052	25	T	S01
K053	25	T	S01
K054	25	T	S01
K055	25	T	S01
K056	25	T	S01
K057	25	T	S01
K058	25	T	S01
K059	25	T	S01
K060	25	T	S01
K061	25	T	S01
K062	25	T	S01
K063	25	T	S01
K064	25	T	S01
K065	25	T	S01
K066	25	T	S01
K067	25	T	S01
K068	25	T	S01
K069	25	T	S01
K070	25	T	S01
K071	25	T	S01
K072	25	T	S01
K073	25	T	S01
K074	25	T	S01
K075	25	T	S01
K076	25	T	S01
K077	25	T	S01
K078	25	T	S01
K079	25	T	S01
K080	25	T	S01
K081	25	T	S01
K082	25	T	S01
K083	25	T	S01
K084	25	T	S01
K085	25	T	S01
K086	25	T	S01
K087	25	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
K088	25	T	S01
K089	25	T	S01
K090	25	T	S01
K091	25	T	S01
K092	25	T	S01
K093	25	T	S01
K094	25	T	S01
K095	25	T	S01
K096	25	T	S01
K097	25	T	S01
K098	25	T	S01
K099	25	T	S01
K100	25	T	S01
K101	25	T	S01
K102	25	T	S01
K103	25	T	S01
K104	25	T	S01
K105	25	T	S01
K106	25	T	S01
K107	25	T	S01
K108	25	T	S01
K109	25	T	S01
K110	25	T	S01
K111	25	T	S01
K112	25	T	S01
K113	25	T	S01
K114	25	T	S01
K115	25	T	S01
K116	25	T	S01
K117	25	T	S01
K118	25	T	S01
K119	25	T	S01
K120	25	T	S01
K121	25	T	S01
K122	25	T	S01
K123	25	T	S01
K124	25	T	S01
K125	25	T	S01
K126	25	T	S01
K127	25	T	S01
K128	25	T	S01
K129	25	T	S01
K130	25	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
K131	25	T	S01
K132	25	T	S01
K133	25	T	S01
K134	25	T	S01
K135	25	T	S01
K136	25	T	S01
P001	2	T	S01
P002	2	T	S01
P003	2	T	S01
P004	2	T	S01
P005	2	T	S01
P006	2	T	S01
P007	2	T	S01
P008	2	T	S01
P009	2	T	S01
P010	2	T	S01
P011	2	T	S01
P012	2	T	S01
P013	2	T	S01
P014	2	T	S01
P015	2	T	S01
P016	2	T	S01
P017	2	T	S01
P018	2	T	S01
P019	2	T	S01
P020	2	T	S01
P021	2	T	S01
P022	2	T	S01
P023	2	T	S01
P024	2	T	S01
P025	2	T	S01
P026	2	T	S01
P027	2	T	S01
P028	2	T	S01
P029	2	T	S01
P030	2	T	S01
P031	2	T	S01
P032	2	T	S01
P033	2	T	S01
P034	2	T	S01
P035	2	T	S01
P036	2	T	S01
P037	2	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
P038	2	T	S01
P039	2	T	S01
P040	2	T	S01
P041	2	T	S01
P042	2	T	S01
P043	2	T	S01
P044	2	T	S01
P045	2	T	S01
P046	2	T	S01
P047	2	T	S01
P048	2	T	S01
P049	2	T	S01
P050	2	T	S01
P051	2	T	S01
P052	2	T	S01
P053	2	T	S01
P054	2	T	S01
P055	2	T	S01
P056	2	T	S01
P057	2	T	S01
P058	2	T	S01
P059	2	T	S01
P060	2	T	S01
P061	2	T	S01
P062	2	T	S01
P063	2	T	S01
P064	2	T	S01
P065	2	T	S01
P066	2	T	S01
P067	2	T	S01
P068	2	T	S01
P069	2	T	S01
P070	2	T	S01
P071	2	T	S01
P072	2	T	S01
P073	2	T	S01
P074	2	T	S01
P075	2	T	S01
P076	2	T	S01
P077	2	T	S01
P078	2	T	S01
P079	2	T	S01
P080	2	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
P081	2	T	S01
P082	2	T	S01
P083	2	T	S01
P084	2	T	S01
P085	2	T	S01
P086	2	T	S01
P087	2	T	S01
P088	2	T	S01
P089	2	T	S01
P090	2	T	S01
P091	2	T	S01
P092	2	T	S01
P093	2	T	S01
P094	2	T	S01
P095	2	T	S01
P096	2	T	S01
P097	2	T	S01
P098	2	T	S01
P099	2	T	S01
P100	2	T	S01
P101	2	T	S01
P102	2	T	S01
P103	2	T	S01
P104	2	T	S01
P105	2	T	S01
P106	2	T	S01
P107	2	T	S01
P108	2	T	S01
P109	2	T	S01
P110	2	T	S01
P111	2	T	S01
P112	2	T	S01
P113	2	T	S01
P114	2	T	S01
P115	2	T	S01
P116	2	T	S01
P117	2	T	S01
P118	2	T	S01
P119	2	T	S01
P120	2	T	S01
P121	2	T	S01
P122	2	T	S01
P123	2	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
U001	2	T	S01
U002	2	T	S01
U003	2	T	S01
U004	2	T	S01
U005	2	T	S01
U006	2	T	S01
U007	2	T	S01
U008	2	T	S01
U009	2	T	S01
U010	2	T	S01
U011	2	T	S01
U012	2	T	S01
U013	2	T	S01
U014	2	T	S01
U015	2	T	S01
U016	2	T	S01
U017	2	T	S01
U018	2	T	S01
U019	2	T	S01
U020	2	T	S01
U021	2	T	S01
U022	2	T	S01
U023	2	T	S01
U024	2	T	S01
U025	2	T	S01
U026	2	T	S01
U027	2	T	S01
U028	2	T	S01
U029	2	T	S01
U030	2	T	S01
U031	2	T	S01
U032	2	T	S01
U033	2	T	S01
U034	2	T	S01
U035	2	T	S01
U036	2	T	S01
U037	2	T	S01
U038	2	T	S01
U039	2	T	S01
U040	2	T	S01
U041	2	T	S01
U042	2	T	S01
U043	2	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
U044	2	T	S01
U045	2	T	S01
U046	2	T	S01
U047	2	T	S01
U048	2	T	S01
U049	2	T	S01
U050	2	T	S01
U051	2	T	S01
U052	2	T	S01
U053	2	T	S01
U054	2	T	S01
U055	2	T	S01
U056	2	T	S01
U057	2	T	S01
U058	2	T	S01
U059	2	T	S01
U060	2	T	S01
U061	2	T	S01
U062	2	T	S01
U063	2	T	S01
U064	2	T	S01
U065	2	T	S01
U066	2	T	S01
U067	2	T	S01
U068	2	T	S01
U069	2	T	S01
U070	2	T	S01
U071	2	T	S01
U072	2	T	S01
U073	2	T	S01
U074	2	T	S01
U075	2	T	S01
U076	2	T	S01
U077	2	T	S01
U078	2	T	S01
U079	2	T	S01
U080	2	T	S01
U081	2	T	S01
U082	2	T	S01
U083	2	T	S01
U084	2	T	S01
U085	2	T	S01
U086	2	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
U087	2	T	S01
U088	2	T	S01
U089	2	T	S01
U090	2	T	S01
U091	2	T	S01
U092	2	T	S01
U093	2	T	S01
U094	2	T	S01
U095	2	T	S01
U096	2	T	S01
U097	2	T	S01
U098	2	T	S01
U099	2	T	S01
U100	2	T	S01
U101	2	T	S01
U102	2	T	S01
U103	2	T	S01
U104	2	T	S01
U105	2	T	S01
U106	2	T	S01
U107	2	T	S01
U108	2	T	S01
U109	2	T	S01
U110	2	T	S01
U111	2	T	S01
U112	2	T	S01
U113	2	T	S01
U114	2	T	S01
U115	2	T	S01
U116	2	T	S01
U117	2	T	S01
U118	2	T	S01
U119	2	T	S01
U120	2	T	S01
U121	2	T	S01
U122	2	T	S01
U123	2	T	S01
U124	2	T	S01
U125	2	T	S01
U126	2	T	S01
U127	2	T	S01
U128	2	T	S01
U129	2	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
U130	2	T	S01
U131	2	T	S01
U132	2	T	S01
U133	2	T	S01
U134	2	T	S01
U135	2	T	S01
U136	2	T	S01
U137	2	T	S01
U138	2	T	S01
U139	2	T	S01
U140	2	T	S01
U141	2	T	S01
U142	2	T	S01
U143	2	T	S01
U144	2	T	S01
U145	2	T	S01
U146	2	T	S01
U147	2	T	S01
U148	2	T	S01
U149	2	T	S01
U150	2	T	S01
U151	2	T	S01
U152	2	T	S01
U153	2	T	S01
U154	5	T	S01
U155	2	T	S01
U156	2	T	S01
U157	2	T	S01
U158	2	T	S01
U159	2	T	S01
U160	2	T	S01
U161	2	T	S01
U162	2	T	S01
U163	2	T	S01
U164	2	T	S01
U165	2	T	S01
U166	2	T	S01
U167	2	T	S01
U168	2	T	S01
U169	2	T	S01
U170	2	T	S01
U171	2	T	S01
U172	2	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
U173	2	T	S01
U174	2	T	S01
U175	2	T	S01
U176	2	T	S01
U177	2	T	S01
U178	2	T	S01
U179	2	T	S01
U180	2	T	S01
U181	2	T	S01
U182	2	T	S01
U183	2	T	S01
U184	2	T	S01
U185	2	T	S01
U186	2	T	S01
U187	2	T	S01
U188	2	T	S01
U189	2	T	S01
U190	2	T	S01
U191	2	T	S01
U192	2	T	S01
U193	2	T	S01
U194	2	T	S01
U195	2	T	S01
U196	2	T	S01
U197	2	T	S01
U198	2	T	S01
U199	2	T	S01
U200	2	T	S01
U201	2	T	S01
U202	2	T	S01
U203	2	T	S01
U204	2	T	S01
U205	2	T	S01
U206	2	T	S01
U207	2	T	S01
U208	2	T	S01
U209	2	T	S01
U210	2	T	S01
U211	2	T	S01
U212	2	T	S01
U213	2	T	S01
U214	2	T	S01
U215	2	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

EPA Hazardous Number	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
U216	2	T	S01
U217	2	T	S01
U218	2	T	S01
U219	2	T	S01
U220	2	T	S01
U221	2	T	S01
U222	2	T	S01
U223	5	T	S01
U224	2	T	S01
U225	2	T	S01
U226	2	T	S01
U227	2	T	S01
U228	2	T	S01
U229	2	T	S01
U230	2	T	S01
U231	2	T	S01
U232	2	T	S01
U233	2	T	S01
U234	2	T	S01
U235	2	T	S01
U236	2	T	S01
U237	2	T	S01
U238	2	T	S01
U239	2	T	S01
U240	2	T	S01
U241	2	T	S01
U242	2	T	S01
U243	2	T	S01
U244	2	T	S01
U245	2	T	S01
U246	2	T	S01
U247	2	T	S01
U248	2	T	S01
U249	2	T	S01

**TABLE 2: CALIFORNIA HAZARDOUS WASTE CODES ACCEPTED AT ADVANCED CHEMICAL
TREATMENT**

California Hazardous Waste Codes	Corresponding EPA Hazardous Waste Code(s)	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
121	D002, D006	.41	T	S01
122	D001, D002	3.38	T	S01
123	D002	1.18	T	S01
131	NONE	16.75	T	S01
133	D001, D018, F005, F005	2.42	T	S01
134	D001, D002, D006	14.21	T	S01
135	D001, D004, D007, D008, D011	80.95	T	S01
141	D001, D002, D007, D018, D035, F003, U134	1.05	T	S01
171	D007	2.59	T	S01
172	NONE	.03	T	S01
181	D001, D004, F003, D006, D007, D008, D009, D011,	28.35	T	S01
211	D001, D018, D019, D022, D038, F002, F003, F005	6.48	T	S01
212	D001, D022, D028, F002, F003, F005	272.29	T	S01
213	D001, D018, D035, F003, F005	6.70	T	S01
214	D001, D002, D011, D018, D022, D026, D035, D038, F002, F003, F005, U154	285.06	T	S01
221	D001	82.12	T	S01
223	NONE,	13.59	T	S01
232	D001, D004, P044	.20	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

California Hazardous Waste Codes	Corresponding EPA Hazardous Waste Code(s)	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
261	NONE	.10	T	S01
271	D001, F003	1.09	T	S01
272	D001, D035	.50	T	S01
291	D001, D035	11.96	T	S01
311	D001, D018, D022, D038, F002, F003, F005	34.76	T	S01
331	D001, D002, D004, D005, D006, D007, D008, D010, D011, D018, D035, F003, F005	80.45	T	S01
343	D001, D002, D011, D035, F002, F003, F005	40.12	T	S01
352	D001, D005, D006, D007, D008, D011, D018, D022, D035, D038, F002, F003, F005	321.87	T	S01
461	D001, D035	3.37	T	S01
511	D001, D002, D003, D005, D006, D007, D008, D009, D011, D018, D022, D026, D035, D038, F002, F003, F004, F005, P105, U031, U107, U109, U123, U188	16.68	T	S01
512	NONE	.73	T	S01
513	D001	21.02	T	S01
551	D001, D002, D018, D022, D035, F002, F003, F005	33.38	T	S01
611	NONE	1.58	T	S01
612	D001, D002,	1.34	T	S01

Attachment 1 - EPA 8700 Site Identification, continued

California Hazardous Waste Codes	Corresponding EPA Hazardous Waste Code(s)	Estimated Annual Quantity Of Waste	Unit of Measure	Process Waste Codes
725	F001, F003 D001, D002, D007, D008, D009, D011	.05	T	S01
741	D001, D018, D021, D022, D028, D038, D039, F002, F003, F005	33.17	T	S01
791	D001, D002, D004, D006, F002, F003	54.60	T	S01
792	D002, D007, D009, D011	.04	T	S01