



Clean Harbors Arizona, LLC
1340 West Lincoln Street
Phoenix, AZ 85007

Delivery via FedEx # 7979 2379 2280

September 10, 2009

Mr. Anthony Leverock, Supervisor
Arizona Department of Environmental Quality
Hazardous Waste Permits Unit
Waste Programs Division
1110 West Washington Street
Phoenix, AZ 85007



RE: Response to Third Notice of Deficiency for the Partial Closure Plan dated August 12, 2009, for the Waste Consolidation Unit located at Clean Harbors Arizona, LLC; 1340 West Lincoln Street Phoenix, AZ 85007; EPA ID Number AZD 049 318 009

Dear Mr. Leverock,

In response to your letter dated August 14, 2009, the following is the amended partial closure plan, which Clean Harbors Arizona (CHA) intends to follow during the closure of the Waste Consolidation Unit (WCU) located at 1340 West Lincoln Street, Phoenix, AZ 85007. This response addresses the deficient items noted by the Department during your third technical review.

In accordance with R18-8-265.A [40 CFR 265, Subpart G], and R18-8-270.A and G, CHA will close the WCU in the following manner:

1. To decommission the waste consolidation unit, the unit will first be inspected to determine if any residual liquid is present that would potentially spill during movement. If liquid is present, the unit will be placed onto a spill pallet prior to movement. If no residual liquid is present, the process equipment will be moved via forklift on a standard pallet into workstation 3, which is an enclosed area designed for waste processing. Run off during the movement of the WCU will not be an issue due to the unit being dry and the unit was not used to process liquid waste. The equipment will be initially cleaned with a nontoxic, water soluble, industrial cleaning agent applied by 40 HAZWOPER trained personnel donned in level C Personal Protective Equipment (PPE) consisting of hooded tyvek chemical resistant suit, full face respirator, inner latex gloves and nitrile outer gloves. The cleaning agent will be chosen based on it's effectiveness as a chemical cleaning agent and toxicity characteristics. The agent will be applied with rags and brushes. An example of one such agent is Fabulene: http://www.chargar.com/Products/cln_a.html; which complies with EPA and OSHA safety standards. Spent cleaning agent will be collected into drums via vacuum



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or pump, and shipped off site as hazardous waste for disposal. Contaminated rags, brushes and PPE will be collected into drums and shipped off site via truck, manifested as hazardous waste for disposal at a Clean Harbors facility.

2. After the initial cleaning with the agent, the consolidation unit and all ancillary equipment (i.e. connection lines that vented to the carbon canister) will be scrubbed with a high-pressure spray detergent wash consisting of Simple Green: <http://industrial.simplegreen.com/> which is a commonly used decontamination detergent, followed by a clean water rinse. Due to the design of workstation 3, potential over-spray from high pressure equipment is easily captured in this unit. The residual liquid used for each of these operations will be collected into drums via vacuum or pump and shipped off site for disposal. After all detergent and rinse solutions have been removed from the process equipment, a final water rinse will be applied to the sides of the inner chamber and the carbon canister connection lines.
3. Grab samples of the final rinse will be collected from the bottom of the WCU chamber by 40 Hour HAZWOPER trained personnel wearing latex gloves. A clean coliwasa rod will be used to gather the sample and it will then be placed into appropriate container based on the analyte being tested. A chart describing the number of samples and type of containers is provided as Attachment 2. The samples will be analyzed and used to verify decontamination in the following manner: All sampling will be performed in accordance with SW-846 procedures, which requires the samples to be collected in the appropriate container for the analyte be tested. The samples will be sealed and given a control number that identifies each sample. Each sample will be placed inside of a cooler (containing ice) or refrigerator and maintained at a temperature of 4 degrees Celsius, prior to transport to the analytical lab. A chain- of-custody will be used to document the transferring of samples to the analytical lab. The samples will be collected by qualified personnel who have received 40 Hour HAZWOPER training.

All samples will be analyzed by a lab that is certified in the state of Arizona. Clean Harbors Arizona will use TestAmerica Labs: <http://www.testamericainc.com/Locations/Phoenix.pdf>, using their internal quality assurance / quality control procedures. Each sample of rinsate water collected for analysis will be assessed for volatile (EPA method 8260 Full List) and semi-volatile organic compounds (EPA method 8270C), metals (EPA 6010) arsenic, barium,



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cadmium, chromium, lead, mercury, selenium, silver, beryllium, nickel, thallium, zinc metals (EPA method 6010), pesticides (EPA method 8081) and herbicides (EPA method 8151). If the test results of the compounds are at or below practical quantitative limits, the equipment will be considered cleaned. If the decontamination criteria are not met, the unit will be re-cleaned.

4. The carbon adsorption canister was removed by CHA personnel and disposed as hazardous waste in 2002. If available, copies of the disposal manifest will be included in the final closure report. The unit has not been used by CHA personnel since. All existing connection lines associated with the pollution control device will be placed into tubs designed for decontamination and cleaned using the same agent as the WCU. Rags and brushes will be used to apply the cleaning agent Fabulene or an equivalent. Simple Green solution will be used to pressure wash the connection lines, followed by clean water rinse, which will be transferred into drums via vacuum or pump. Samples from the clean water rinse will be collected with a clean coliwasa tube and placed into the appropriate sampling containers. The samples will be managed in the same manner as those taken from the WCU. Contaminated rags and brushes used during the cleaning process will be placed into drums. Residual liquid generated from the decontamination process will also be placed into drums. The resulting drums will be manifested as hazardous waste and shipped off site via truck for disposal at a Clean Harbors facility.
5. The intent is to recycle the decontaminated WCU unit offsite for the steel value. If the WCU and ancillary equipment are to be sent offsite as recycled scrap, in lieu of wipe sampling, the unit may be completely deconstructed with every surface completely exposed, decontaminated, and then 100% surface inspected for residue prior to disposal. CHA may elect to send the unit and/or ancillary equipment offsite as hazardous waste for disposal if the cleaning process does not successfully decontaminate the unit and/or ancillary equipment.
6. Prior to concluding WCU closure activity, a visual inspection of the containment area for stains and cracks where the WCU was located will be performed. Any stain discovered will be clean with a pressure wash. Any crack or gap found in the containment coating will be repaired. CHA understands that this is an area of concern for facility closure and this area is included in the facility's closure plan for concrete and soil investigation.



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7. Within 60 days of completion of closure of the WCU, CHA will submit to the ADEQ, by registered mail, a certification that the hazardous waste management unit has been closed in accordance with the specifications provided in this partial closure plan. The certification will be signed by CHA and by a qualified Professional Engineer (PE). The PE will be certified in Arizona, qualified, and in good standing. Documentation supporting the Professional Engineer's certification will be furnished to the ADEQ.
8. Within 60 days of completion of closure activities, CHA will submit to ADEQ a closure report which will contain the following information:
 - a. A narrative summary of the closure results, significant observations, and conclusions.
 - b. A general description of the closure procedures that were followed, which will address:
 - i. The procedures followed for decontamination of the WCU (including disposition of residues);
 - ii. The equipment used for decontamination of the WCU;
 - iii. The sampling procedures used;
 - iv. The equipment used for sampling;
 - v. The remedial procedures (if applicable) used;
 - vi. The equipment used for remediation (if applicable);
 - vii. The analytical procedures and methods used;
 - viii. The analytical equipment used;
 - ix. The quality assurance program used;
 - x. The procedures used to prevent hazards and protect field personnel during closure;
 - xi. The equipment used to prevent hazards and protect field personnel during closure;
 - xii. Drawing and photographs as appropriate;
 - xiii. Description of any deviations from the approved CP.



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- c. Data generated from sampling and analysis activities performed pursuant to the forms, chain-of-custody forms, laboratory reports, and drilling logs.
- d. The certifications from the engineer and the owner / operator.

CHA hereby makes the following certification to the information submitted in this document:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.

If you have any questions regarding the information submitted, please feel free to contact Joe Christopher, the facility Compliance Manager at 310-233-3499. Thank you for your time in this matter.

Sincerely,

Michael Crisenbery, CHMM
Vice President, Environmental Compliance
Clean Harbors Environmental Services, Inc.

cc: Brian Parker Clean Harbors Arizona
Joe Christopher Clean Harbors Arizona

Attachments

- Waste Consolidation Unit Closure Schedule (ATTACHMENT 1)
- Waste Consolidation Unit Sample Chart (ATTACHMENT2)



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ATTACHMENT 1

WASTE CONSOLIDATION UNIT CLOSURE SCHEDULE

Within 10 days from approval of closure by the ADEQ, an Arizona certified Professional Engineer (PE) in good standing will be retained to over see closure activity.

Within 5 days after contacting the PE, the WCU will be moved to workstation 3 to begin the decontamination process.

Appropriate sampling kits will be obtained from TestAmerica, which will coincide with the WCU decontamination process to ensure that all samples will be collected on the same day.

Within 24 hours of collection, samples will be sent to TestAmerica Laboratories located at: 4625 East Cotton Center Blvd, Suite 189, Phoenix, AZ 85040.

Within 10 business days, lab analysis will be obtained and evaluated to determine effectiveness of decontamination process.

Assuming initial decontamination activity is successful, within 5 days of analytical evaluation; the WCU will be disassemble and prepared for disposal along with all of waste generated from the closure process.

Within 60 days of completion of closure of the WCU, CHA will submit to the ADEQ, by registered mail, a certification that the hazardous waste management unit has been closed in accordance with the specifications provided in this partial closure plan.

CHA understands that a 30 day public notice is required prior to commencing WCU closure activity



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ATTACHMENT 2

WASTE CONSOLIDATION UNIT SAMPLE CHART

<u>Name</u>	<u>Test</u>	<u>No. of Samples</u>	<u>Duplicate</u>	<u>Container Type</u>
WCU Chamber		1	1	
	6010			500 ml plastic
	8260			40ml glass
	8270C			1L glass
	8081			1L glass
	8151			1L glass
Ancillary Equipment		1	1	
	6010			500 ml plastic
	8260			40ml glass
	8270C			1L glass
	8081			1L glass
	8151			1L glass
Carbon Connection Lines		1	1	
	6010			500 ml plastic
	8260			40ml glass
	8270C			1L glass
	8081			1L glass
	8151			1L glass

Total no. of samples: 3 samples and 3 duplicates

All samples will be collected by 40 hour trained CHA personnel. Samples and duplicates will be placed in each respective sample container as required per the method, sealed and control numbers placed on each container. Lab samples will be placed into a cooler (containing ice) or placed into a refrigerator and maintained and 4 degrees Celsius. A chain of custody will be used to relinquish all samples to TestAmerica.

From: Origin ID: CVGA (513) 681-5738
Michael Crisenbery
Clean Harbors
4879 Spring Grove Ave

Cincinnati, OH 45232



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Ship Date: 11SEP09
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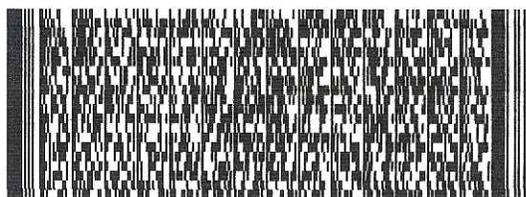
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Invoice #
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SHIP TO: (602) 771-4160 **BILL SENDER**
Anthony Leverock
Arizona DEQ
1110 W WASHINGTON ST

PHOENIX, AZ 85007

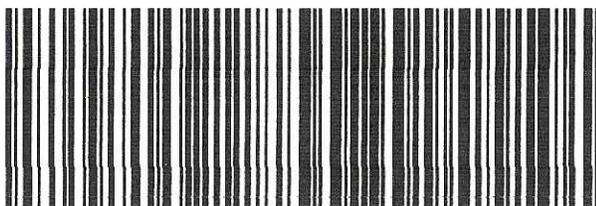
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