

ATTACHMENT 2 WASTE ANALYSIS PLAN

Waste Description	USEPA Waste Codes ¹	Location In Facility ²	Annual Volume (,000 gal)
Aqueous Brake Cleaner	D039	Warehouse	4
Aqueous Immersion Cleaner	None	Warehouse	4
Aqueous Parts Cleaner	None	Warehouse	4
Branch Contaminated Debris	F001, F002, F003, F005, D001, D006, D007, D008, D011, D018, D022, D027, D028, D035, D039, D040	Warehouse	1
Immersion Cleaner	D006, D008, D018, D039, D040	Warehouse	8
Parts Washer Solvent (105/150)	D001, D018, D039, D040	Storage Tank and Drum Washer Units	300
Parts Washer Solvent (105)	D001, D018, D039, D040	Warehouse and Drum Washer Units	300
Parts Washer Solvent (150)	D039	Warehouse and Drum Washer Units	300
Parts Washer Solvent Sludge	D001, D039	Warehouse and Drum Washer Units	10
Parts Washer Solvent Tank Bottoms	D039	Storage Tank	2
Paint Gun Cleaner	F005, F003, D001, D018, D035, D039, D040	Warehouse	15
Paint Waste Other	F005, F003, D001, D018, D035, D039, D040	Warehouse	15
Dry Cleaner (Perc) Bottoms	F002, D007, D039, D040	Warehouse	13
Dry Cleaner (Perc) Filter Powder	F002, D039, D040	Warehouse	13
Dry Cleaning Naphtha (Mineral Spirits)	D001, D039	Warehouse	13

2.1 Description of Wastes

Several types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. It should be noted that the solvents managed at the facility are incompatible with strong oxidizers and reactive metals, none of which are present at the facility. The wastes and products managed at the facility are compatible. Analytical data for the wastes are located in Appendix D-5 (“Statistical Analysis of Annual Waste Characterization Data and Data Summary

¹ Waste codes are reassessed annually or more often as needed. For example, please see 2002 re-characterization data in Appendix D-5. There may be some small changes in the waste codes (For example, see the changes from last year to this year in the re-characterization data in Appendix D-5). The customer may select codes different than Safety-Kleen’s codes based on the customer’s waste characterization. All waste streams may be toxic and may additionally include: D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

² Warehouse capacity is 6,912 gallons where no more than 1,375 may be flammable material; drum washer unit capacity 2 at 162 gallons or 324 gallons; tank capacity is 12,000 gallons.

for 2002”). The Material Safety Data Sheets are accessible electronically through 3E, Safety-Kleen’s intranet, and hard copies are maintained at the facility. The qualitative descriptions follow.

2.1.1 Wastes Resulting From Parts Washer Service

Waste parts washer solvent (primarily mineral spirits) are accumulated in the 12,000-gallon above ground storage tank. USDOT specification containers containing waste parts washer solvent are emptied into a drum washer unit located in the return and fill station which in turn empties into the above ground waste storage tank. This first type of parts washer service handling method results in three waste streams:

2.1.1.1 Spent Parts Washer Solvent

The spent parts washer solvent is removed from the tank and moved off-site for recycling before the tank reaches 95 percent capacity. Six to seven thousand gallons are removed every week. The waste parts washer solvent carries the USEPA waste codes, D001, D018, D039, D040. In 2001, the Chandler service center sent about 300,000 gallons of waste parts washer solvent to Reedley, California or Denton, Texas for recycling.

2.1.1.2 Parts Washer Solvent Tank Bottoms

As needed (approximately annually) sediment and other solids are removed from the bottom of the above ground waste storage tank. A vacuum truck is used for this purpose and then used to transport the parts washer tank bottoms to a Safety-Kleen recycling center or other facility permitted to receive the material. Currently the parts washer solvent tank bottoms carries the USEPA waste code, D039. This code may change in the future, based on annual re-characterization data.

2.1.1.3 Parts Washer Solvent Sludge

Sediment also accumulates in the drum washer units located in the return and fill station. The sediment is removed from the basket and placed in a drum washer unit sediment container satellite accumulation drum. When full, this container of sediment will then be stored in the permitted container storage area until transported to a recycle center. The waste parts washer solvent sludge currently has USEPA waste codes D001 and D039. In 2001 approximately 2,100 gallons of parts washer solvent sludge were transported to recycling centers for reclamation.

2.1.1.4 Waste Immersion Cleaner

A second type of parts cleaner is called immersion cleaner. Immersion cleaner is received at the facility and shipped to the recycling center in a 16-gallon container. These containers are not opened at the service center. These USDOT specification containers of waste immersion cleaner have USEPA waste codes: D006, D008, D018, D039, and D040. In 2001 approximately 10,000 gallons of waste immersion cleaner were transported to recycling centers for reclamation.

2.1.1.5 Spent Aqueous Parts Cleaner

Spent aqueous parts cleaner is generated in a manner similar to the waste parts washer solvent. However, the "solvent" is an aqueous system rather than a petroleum naphtha solvent. Spent aqueous parts cleaner is non-hazardous.

2.1.1.6 Spent Aqueous Immersion Cleaner

Another type of parts cleaner is spent aqueous immersion cleaner. Aqueous immersion cleaner is non-hazardous.

2.1.1.7 Waste Aqueous Brake Cleaner

Waste aqueous brake cleaner is generated from cleaning automotive brake parts. Waste aqueous brake cleaner is received at the facility and shipped to the recycling center in the container into which the customer originally placed the waste. These containers are not opened at the service center. These USDOT specification containers of waste aqueous brake cleaner have USEPA waste code D039. This waste is transported to a recycling center for reclamation.

2.1.2 Wastes Resulting from Dry Cleaner Service

Dry cleaning wastes consist of; (1) waste dry cleaner (perc) filter powder a subset of this waste stream is (2) waste dry cleaner (perc) filter cartridges, and (3) dry cleaner (perc) bottoms. These wastes are placed in USDOT specification containers by the customer as generated and transported to the service center for storage. These containers are not opened at the service center. This waste is then shipped to a recycling center for reclamation.

2.1.2.1 Waste Dry Cleaner (Perc) Filter Powder (And Waste Dry Cleaner Filter Cartridges)

Waste dry cleaner (perc) filter powder is generated from providing dry cleaning services to the public by Safety-Kleen customers. Waste dry cleaner (perc) filter powder is received at the facility and shipped to the recycling center in the container into which the customer originally placed the waste. These containers are not opened at the service center. These USDOT-specification containers of waste dry cleaner (perc) filter powder have USEPA waste codes F002, D039, D040. This waste is transported to a recycling center for reclamation.

2.1.2.2 Waste Dry Cleaner (Perc) Bottoms

Waste dry cleaner (perc) bottoms are generated from providing dry cleaning services to the public by Safety-Kleen customers. Waste dry cleaner (perc) bottoms is received at the facility and shipped to the recycling center in the container into which the customer originally placed the waste. These containers are not opened at the service center. These USDOT specification containers of waste dry cleaner (perc) bottoms have USEPA waste codes F002, D007, D039, and D040. This waste is transported to a recycling center for reclamation.

2.1.2.3 Waste Dry Cleaning Naphtha (Mineral Spirits)

Waste dry cleaning naphtha (mineral spirits) is generated from providing dry cleaning services to the public by Safety-Kleen customers. Waste dry cleaning naphtha (mineral spirits) is received at the facility and shipped to the recycling center in the container into which the customer originally placed the waste. These containers are not opened at the service center. These USDOT specification containers of waste dry cleaning naphtha (mineral spirits) have USEPA waste codes D001, D039. This waste is transported to a recycling center for reclamation.

2.1.3 Wastes Resulting from Autobody Repair

Wastes resulting from autobody repair include (1) waste paint gun cleaner and (2) paint waste other. These wastes are placed in USDOT specification containers by the customer as generated and transported to the service center for storage. These containers are not opened at the service center. These wastes are then shipped to a recycling center for reclamation.

2.1.3.1 Waste Paint Gun Cleaner

Waste paint gun cleaner is generated when Safety-Kleen's customers clean paint spray guns after painting automobiles or parts. Waste paint gun cleaner is received at the facility and shipped to the recycling center in the container into which the customer originally placed the waste. These containers are not opened at the service center. These USDOT specification containers of waste paint gun cleaner have USEPA waste codes F003, F005, D001, D018, D035, D039, and D040. This waste is transported to a recycling center for reclamation.

2.1.3.2 Paint Waste Other

Paint Waste Other is also generated Safety-Kleen's customers by collecting the excess amounts of paint and related waste. Paint Waste Other is received at the facility and shipped to the recycling center in the container into which the customer originally placed the waste. These containers are not opened at the service center. These USDOT specification containers of paint Waste Other have USEPA waste codes F003, F005, D001, D018, D035, D039, and D040. This waste is transported to a recycling center for reclamation.

2.1.4 Antifreeze Reclamation Service

2.1.4.1 Automotive, Non Automotive, High Risk

Used Antifreeze is categorized into three categories; Automotive, Non-Automotive, and High Risk. All antifreeze is recycled as is non-hazardous; all non automotive and high risk used antifreeze is profiled by trained Safety-Kleen representatives to ensure the waste is not RCRA hazardous waste. Used antifreeze may be managed in two ways; these materials may be collected in containers meeting USDOT specifications from the customer's premises, or they may be collected using a high volume tank truck. The materials are picked up on a periodic basis and transported back to the service center where they may be stored prior to shipment to a recycler. Used antifreeze may also be collected by a high volume tanker truck. Large volumes are collected from the customer's premises and then transported back to the service center where the

material is off-loaded into the 12,000 gallon used antifreeze tank on site via the tank access connector.

Accumulated used antifreeze will be transferred periodically from the 12,000 gallon tank to a tanker truck for transport to an offsite recycler.

2.2 Quality Control Procedures

2.2.1 Quality Control in the Field

The used solvents managed at the Chandler service center are the primary feedstocks for the generation of Safety-Kleen products. As a result, quality control of the used materials is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects spent solvents from numerous customers, most of whom are small quantity generators or conditionally exempt small quantity generators, and approximately 30,000 containers containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

Furthermore, as discussed earlier in the Facility Description, materials collected at the Chandler service center are typically collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences and annual re-characterization data have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers. The acceptance criteria are in Appendix D-4 "Acceptance Criteria For Hazardous Waste". This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

In accordance with Arizona Administrative Codes R-18-8-260 et.seq., Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the customer's process or operation generating the waste has changed, or when the result of inspection indicates that the waste received at the service center does not match the waste designated on the accompanying manifest or shipping paper. Safety-Kleen's customers have agreed to notify Safety-Kleen if the process or nature of his business has changed. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been done or the material must be rejected.

If a container with questionable contents is returned to the service center, a sample will be taken and analysis will be performed at the recycle center or by an independent state certified laboratory according to the procedures outlined in Appendices D-1 ("Parameters and Rationale For Hazardous Waste Selection"), D-2 ("Parameters and Test Methods/Frequencies"), D-3 ("Methods Used To Sample Hazardous Wastes"), and D-4 ("Qualitative Acceptance Criteria"), and Section 2.3 "Waste Analysis at the Recycle Center." Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

Safety-Kleen controls the use and management of its solvents by:

1. Limiting the solvents stored to those compatible with one another and their containers.
2. Limiting the uses of each type of solvent (for example, dry cleaner waste is only collected from dry cleaners)
3. Determining the customer's type of business (i.e., his SIC code is recorded) and the purpose for which he will use the machine.
4. Training customers to use the machines properly;
5. Training employees to inspect spent solvent and determine whether it is acceptable;
6. Indicating on the service document, whether the spent solvent meets Safety-Kleen's acceptance criteria (Appendix D-4 "Qualitative Acceptance Criteria");
7. Marking each container with the customer's name, address and EPA I.D. number (if required). This information remains on containerized waste until it is accepted at the reclamation facility;
8. Keeping a record of each incoming and outgoing shipment in the operating log at each facility,
9. The containers of spent immersion cleaner, dry cleaning, and paint wastes collected at the service center will not be combined with any other containers of wastes, i.e., they are to be stored and transported in the original containers in which they were collected.

Safety-Kleen's customers sign a service document certifying the following information:

1. The name, address and EPA I.D. number of the facility to which the waste is being shipped;
2. The customer's name, address and EPA I.D. number (if required); and
3. The description and amount of Safety-Kleen solvent waste generated.

In addition, each incoming and outgoing shipment is recorded in the facility's operating log.

If a particular drum of waste does not meet the acceptance criteria, the Safety-Kleen service representative will either (1) sample the waste for testing at a Safety-Kleen laboratory to determine if the waste has been contaminated or (2) reject the waste.

If the customer requests Safety-Kleen's assistance, a sample will be drawn using a coliwasa tube and it will be analyzed for flash point and volatile organic compounds. If this analysis does not

adequately define the constituents, additional analysis will be performed as necessary (i.e., semi-volatile organic compounds, base-neutral compounds, polychlorinated biphenyls, etc.).

If the waste is acceptable at the service center, it will be relabeled and manifested appropriately with other wastes. If it is not acceptable, it will either be: (a) managed on a 10-day transfer basis and manifested to a properly permitted reclamation or disposal facility, or (b) manifested and transported immediately to a properly permitted reclamation or disposal facility.

2.2.2 Parts Washer Service

Prior to leasing a parts washer machine, the customer's business activity is reviewed. Where the possibility exists for contamination of the parts washer solvent, (i.e., pesticide, herbicide, pharmaceutical, etc., operations), the process is reviewed to ensure that the solvent is protected from sources of contamination. A chemical and physical analysis of the waste is not necessary because the review of the business activity has proven successful in providing Safety-Kleen with all the information which must be known to treat, store, recycle, and dispose of the waste in accordance with all applicable regulations.

Safety-Kleen employees are instructed to inspect the parts washer and solvent as a part of providing service to the customer. This is done in accordance with Appendix D-4 "Acceptance Criteria for Hazardous Waste."

The dirty parts washer solvent inside the parts washer machine is inspected for its appearance and consistency through routine solvent pick up procedures. When a Safety-Kleen sales representative services a dirty parts cleaner machine, he turns on the machine and lets it run for a while. Wearing personal protective equipment, the sales representative washes out the sink and wipes down the parts cleaner machine. During this procedure, the sales representative obtains first hand observation as to the consistency or appearance of the solvent. The sales representative also notes whether the dirty solvent is doing an adequate job of cleaning the parts cleaner machine or if the solvent happens to remove the painted coating on the parts cleaner machine. Both are an indication the spent solvent may have been tampered with. If any difference in the appearance or consistency of the solvent is noted, the service representative will sample the waste for possible contamination or reject the waste. Other acceptance criteria for determining by visual inspection whether spent parts washer solvent has been contaminated are volume and color, the most significant of which is volume. Spent parts washer solvent is collected in USDOT specification containers.

The spent parts washer solvent is also visually inspected for its color. Unused parts washer solvent may vary between clear and tinted in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. Therefore, if the spent solvent does not appear to be clear, tinted, brown, or black, the service representative will reject the waste

2.2.3 Immersion Cleaner

The spent immersion cleaner is inspected for its appearance, consistency through routine solvent pick up procedures. When a Safety-Kleen sales representative picks up spent immersion cleaner

from a business, wearing protective goggles, gloves, and an apron, he lifts the submerged basket from the spent solvent container. This basket will contain small amounts of oil and foreign matter. If this amount is more than the sales representative expects, the business owner's practices will be questioned. The business owner and/or employees often mention to the sales representative that the solvent is not cleaning properly. This is another indication that the immersion cleaner may have been tampered with. Other criteria for the inspection of spent immersion cleaner are volume, color and physical state. There should be no more than 6 gallons of waste.

Unused immersion cleaner is amber in color. As the solvent is used, it turns brown in color. The more it is used, the darker brown it becomes, until it is almost black. Therefore, if the spent immersion cleaner does not appear to be amber, brown or black, the service representative will either sample the waste for possible contamination as described above, or reject the drum of waste.

2.2.4 Dry Cleaner Wastes

Dry cleaner wastes consist of spent filter cartridges, powder residue and still bottoms.

2.2.4.1 Spent Filter Cartridges

When the sales representative inspects the drum for spent filter cartridges, he first inspects the drum to ensure it is in good condition before he inspects the consistency of the cartridges. Spent Filter cartridges are placed in USDOT approved containers. The service representative observes the spent filter cartridges for any observable foreign material, which may have been thrown into the container, which are not spent filter cartridges. It is obvious to the service representative whether the items in the drums are filter cartridges.

If the amount of the liquid is greater than approximately one inch or if the liquid is a color other than light brown, the Safety-Kleen service representative will either: (1) obtain a representative sample for the purpose of obtaining a detailed physical and chemical analysis. This analysis shall be performed according to the procedures outlined in Appendices D1 through D-4 in conjunction with any and all other test methods necessary to determine whether the waste which was to be received matches the identity of the waste which was specified on the generator's manifest or shipping paper. After obtaining the sample, the Safety-Kleen service representative shall seal the container and label it as hazardous waste. The container is then left with the customer pending the results of the detailed physical and chemical analysis, or (2) reject the waste.

2.2.4.2 Powder Residue

When the sales representative inspects the drum for the powder residue, he first inspects the container to make sure it is in good condition before he inspects the consistency of the powder to check if the drum may have been tampered with. The criteria for the acceptance of powder residue are consistency and color, the former being the more significant criterion of the two. The sales representative will observe the following characteristics. A container of powder residue should not contain any liquid. As the name implies, it will be dry or "powdery" to the touch. If

there is any liquid in the drum, the waste will be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

The powder residue is also inspected for color and should appear to be grayish-black. If the residue is not grayish-black in color, the service representative will sample the waste for contamination in accordance with the procedures described above, or will reject the waste. After obtaining the sample, the Safety-Kleen service representative will seal the container and label it as hazardous waste. The container is then left with the customer pending the results of detailed physical and chemical analysis.

2.2.4.3 Still Bottoms

When the sales representative inspects the container for still bottoms, he first inspects the container to make sure it is in good condition before he inspects the consistency of the still bottoms to check if the drum may have been tampered with. The criteria for the acceptance of dry cleaning still bottoms are consistency and color. The sales representative will observe for the following characteristics. The waste should have a highly viscous, tar-like consistency. If the color of the waste is not brown, dark brown, or black in color or if the waste does not appear to be still bottoms, waste dry cleaning solvent or water generated from the dry cleaning process, the Safety-Kleen service representative will either: (1) obtain a representative sample for the purpose of obtaining a detailed physical and chemical analysis. This analysis shall be performed according to the procedures outlined in Appendices D-1 (“Parameters and Rationale for Hazardous Waste Selection”, D-2 (“Parameters and Test Methods/Frequency”), D-3 (“Methods Used To Sample Hazardous Wastes”), and D-4 (“Qualitative Acceptance Criteria”) in conjunction with any and all other test methods necessary to determine whether the waste which was to be received matches the identity of the waste which was specified on the generator’s manifest or shipping paper. After obtaining the sample, the Safety-Kleen service representative shall seal the container and label it as hazardous waste. The container is then left with the customer pending the results of the detailed physical and chemical analysis, or (2) reject the waste.

2.2.5 Paint Wastes

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste.

2.2.5.1 Waste Paint Gun Cleaner

The significant criterion for determining whether paint gun cleaner waste will be accepted is volume. The solvent is provided to customers in 5-gallon containers. The paint gun-cleaning machine operates as a closed system whereby there should never be a combined volume of more than 7 1/2 gallons of solvent in the two collection containers. The solvent is pumped from a tube in a left-hand container (facing the machine) through the machine into a right hand container. The tube in the left-hand container extends exactly half way into the pail (i.e., to the 2 1/2-gallon mark). The left-hand container starts with 5 gallons of clean solvent that will be pumped out as the machine is used to clean the spray guns. This process will continue until the left hand container contains 2 1/2 gallons of solvent. Any solvent above 2 1/2 gallons remaining in the left

hand container at the time of servicing will be pumped through the machine into the right hand container by the Safety-Kleen service representative. Therefore, when the machine is serviced, the right hand container will always contain 5 gallons of solvent. If a service representative discovers more than a total of 7 1/2 gallons of solvent in the two containers or there is an overflow from the right hand container, the Safety-Kleen representative will either: (1) obtain a representative sample for the purpose of obtaining a detailed physical and chemical analysis. This analysis shall be performed according to the procedures outlined in Appendices D-1 ("Parameters and Rationale for Hazardous Waste Selection", D-2 ("Parameters and Test Methods/Frequency"), D-3 ("Methods Used To Sample Hazardous Wastes"), and D-4 ("Qualitative Acceptance Criteria") in conjunction with any and all other test methods necessary to determine whether the waste which was to be received matches the identity of the waste which was specified on the generator's manifest or shipping paper. After obtaining the sample, the Safety-Kleen service representative shall seal the container and label it as hazardous waste. The container is then lefts with the customer pending the results of the detailed physical and chemical analysis, or (2) reject the waste.

2.2.5.2 Paint Waste Other

When the sales representative inspects the container for paint waste, he first inspects the drum to make sure it is in good condition before he inspects the paint waste to check if it may have been tampered with. Paint waste can only be added to a Safety-Kleen drum via a special bunghole at the top of the container. To inspect the contents of the drums the sales representative will remove the bung of the container. The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The service representative may insert a long glass tube into the container. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the 3-foot tube (the water and paint will separate in the tube and thus can be measured) the waste will be rejected. The container is sealed and the sales representative will ensure the seal is closed tight to prevent anyone from contaminating the contents.

2.2.6 Used Antifreeze

2.2.6.1 Automotive, Non Automotive, High Risk

Antifreeze wastes will meet Safety-Kleen's criteria for acceptance prior to pick up to include color, odor, etc. Non Automotive and high risk wastes are profiled prior to collection by trained Safety-Kleen Sales Representative to ensure the materials are RCRA non hazardous. Antifreeze wastes are collected from facilities where generally one process is managed and the possibility of cross contamination from other chemicals or wastes is minimal. The contents of the containers are verified by the Safety-Kleen sales representative at the customer's location. Antifreeze is collected at the customer's location in a tanker truck, or in containers. All non-automotive and high risk antifreeze accounts are individually profiled prior to acceptance. If questions arise as to

whether the antifreeze meets RCRA non-hazardous status, a complete hazardous waste determination to ensure proper waste management is conducted. Antifreeze may be transferred into the used antifreeze tank on site, into totes, or directly into a different tanker truck parked on site. Periodically a tanker truck is dispatched to the Service Center where the contents of the used antifreeze tank, the individual totes, or containers are transferred into the tanker truck for transport to a recycling center.

2.2.6 Quality Control at the Service Center

In addition to the quality control performed in the field, for wastes collected every week or more frequently from customers, specific gravity will be tested at least two times per year, with a composite sample allowed for customers with multiple units. The composite sample shall contain waste from every parts washer unit at the customer's facility. All other customers will be tested once per year except conditionally exempt small quantity generators. Testing can be performed at the customer's facility or at the service center. The results of these tests will be noted on the service document and maintained as part of the service center operating log.

For parts washer solvent, at the service center the sales representative or the warehouseman again observes the quantity, odor, and appearance of the solvent prior to emptying the solvent into the drum washer unit. Containers with questionable contents are set aside and the customer questioned. Pending the customer's response the container is accepted, returned to the customer, or properly disposed of at the customer's expense. For other wastes, the containers are not opened at the service center, so there is no further opportunity for inspection until the waste reaches the recycle center.

2.3 Waste Analysis at the Recycle Center

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. In addition, the Chandler Service Center will receive and retain a copy of the detailed waste analysis performed on any waste shipped off-site to the recycle center. The following tables in Appendix D ("Analytical Data") summarize the waste analysis plan practiced at the recycle center for the hazardous materials returned from the service center:

- Appendix D-1: ("Parameters and Rationale for Hazardous Waste Selection")
- Appendix D-2: ("Parameters and Test Methods/ Frequency")
- Appendix D-3: ("Methods Used to Sample Hazardous Wastes")
- Appendix D-4: ("Qualitative Acceptance Criteria")

In addition to the aforementioned analyses, TCLP analyses for all compounds, except pesticides, will be conducted each calendar year on all waste streams, as outlined in Appendix D-4 ("Qualitative Acceptance Criteria") (for example: used parts washer solvent and immersion cleaner).

Safety-Kleen always reserves the right that if, based upon information or analyses obtained at anytime, the waste material is found to be different from what was represented to be shipped, or

it cannot be managed at the facility, a shipment acceptance may be revoked and the shipment rejected and returned to the generator or sent to an alternate facility for proper disposal. This may occur even after the manifest has been signed, the shipment unloaded and release of the transporter. The information review process covers the following items:

- Safety and health provisions;
- Permit limitations and conditions;
- Process capability and availability;
- Compatibility of the material to the facility storage and operations;
- Storage volume availability;
- Generator Name and ID;
- Transporter name and ID;
- Facility Name and ID;
- DOT Proper Shipping Name;
- U.S. EPA Waste Code;
- Quantity;
- Primary Analytical Results;
- Secondary Analytical Results;
- State Specific regulations;
- Notice of Land Disposal Restrictions (if applicable).

Each test parameter that an in-state or out-of-state laboratory (including Safety-Kleen recycle center) can perform for hazardous waste analysis must be certified by the Arizona Department of Health Services (ADHS) [ARS Title 36, Chapter 4.3, Article 1, Section 36-495.01]. Additionally, if a contract laboratory is used to perform analyses, then the service center will inform the laboratory, in writing, that it must operate under the conditions set forth in the permit. A copy of that document notifying the laboratory will be included in the final report to document the notice.

2.4 Waste Analysis Plan Update

This waste analysis plan will be modified when a new waste material is collected or when sampling and material management methods change. Safety-Kleen's corporate office will initiate permit modifications and perform all facility mailing list notifications.

2.5 Land Disposal Restriction Notification and Certification Forms

In accordance with 40 CFR §268.7, Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

- Printing the Notice language on the manifests - such as for core-business customers to branch shipments; or
- Special forms for each regularly handled waste types (i.e., Parts Washer Solvent, Paint Gun Cleaner, etc.); or
- A general form that must be completed for unique or non-standard waste streams. These wastes will only be handled on a transfer basis, in accordance with 40 CFR §263.12.

The notice is required paperwork for all Safety-Kleen waste types that require land disposal notification/certification. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the Notice is kept in the files of the receiving facility with the manifest. The certification is also required to be submitted the treatment, storage, and / or disposal facility in accordance with 40 CFR §268.7.

2.6 Waste Determination for Subpart BB and CB Compliance

For purposes of waste determination, this facility utilizes knowledge of the wastes described in Sections 2.1, 2.2, and 2.3 above. For those hazardous wastes that are managed on a transfer basis, outside of the permitted units, the 40 CFR Part 264 Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers or waste certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that most waste solvents managed in tanks and containers at this facility may display an average volatile organic concentration of greater than 500 ppm at the point of waste origination. Documentation of this knowledge is provided in Appendix D-5, (“Statistical Analysis of Annual Waste Characterization Data and Data Summary For 2002”), as required in 40 CFR §264.1063(d) and 264.1083. Therefore, hazardous wastes managed in tanks and containers at this facility shall be managed in accordance with applicable subpart CC standards.