



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

FACT SHEET

**HAZARDOUS WASTE FACILITY PERMIT
HERITAGE ENVIRONMENTAL SERVICES, LLC
284 EAST STOREY ROAD
COOLIDGE, ARIZONA
EPA I.D. NO. AZD 081 705 402**

This fact sheet was prepared in accordance with the Arizona Administrative Code (A.A.C.) R18-8-271.E(e) and R18-8-271.G. A fact sheet must accompany every Arizona Hazardous Waste Management Act (AHWMA) draft permit that the Arizona Department of Environmental Quality (ADEQ) has prepared that either raises major issues or involves a new facility. All references to the A.A.C. hereafter refer to the A.A.C. R18-8-260 et seq., made effective on June 30, 2012, which incorporates and/or modifies parts of Title 40 Code of Federal Regulations (CFR) Parts 260 et seq. (July 1, 2006, and July 1, 2011 Editions).

The Arizona Department of Environmental Quality (ADEQ) has prepared a draft hazardous waste permit renewal for Heritage Environmental Services, LLC (Heritage). The draft permit proposes to allow Heritage to continue operating its existing hazardous waste management facility located at 284 East Storey Road, Coolidge, Arizona (see Figure 1) for 10 years. The facility currently operates pursuant to a hazardous waste permit issued February 11, 1999, and revised June 11, 2004.

I. FACILITY DESCRIPTION

The Heritage Coolidge facility (see Figure 2) receives a variety of hazardous and non-hazardous wastes. Incoming wastes are segregated, consolidated, blended, and prepared for shipment to other treatment, storage, and disposal facilities, or recyclers. Waste processing is performed in six areas: the Central Storage Area, the East Container Storage Area, the Lab Depack Storage Area, the Hazardous Roll-Off Storage area, the Dock and Van Storage Area (DVSA) and the 800 Storage Area. Each of these areas may store a combination of hazardous and non-hazardous wastes. There are no hazardous waste incinerators, landfills, waste piles, surface impoundments, and land treatment units in the facility.

II. SITE HISTORY

Heritage's Coolidge facility has been permitted since 1999. Heritage has applied for renewal of its hazardous waste facility permit in order to continue its current operations. Prior to the arrival of Heritage, this site was used by the Proler International facility.

III. TYPES AND QUANTITIES OF HAZARDOUS WASTES MANAGED AT THE FACILITY

Types of Hazardous Wastes

The facility typically receives wastes via commercial hazardous waste transporters. Solid hazardous wastes are received in roll-off bins, drums, pails, and other miscellaneous-sized containers meeting Department of Transportation (DOT) standards. Liquid hazardous wastes are received in drums, pails, totes, miscellaneous-sized containers meeting DOT standards, and tanker trucks.

Heritage serves various types of industries and commercial enterprises that generate hazardous and non-hazardous waste. Typical wastes accepted by Heritage include solids, liquids, and sludges; contaminated soil and debris; organic waste streams such as inks, paints, solvents; and lab packs. Wastes that are not accepted at the facility include radioactive wastes, biohazardous wastes, PCBs, and class 1.1 – 1.3 explosives. More specific information on the waste types (and waste codes) and storage areas can be found in the draft Permit in Part III, “Hazardous Waste Storage and Treatment in Containers” and Permit Attachment C, “Container Storage and Consolidation Plan”, and in the federal hazardous waste rules in 40 CFR §261 Subpart C, “Characteristics of Hazardous Wastes” and 40 CFR §261 Subpart D, “Lists of Hazardous Waste.”

Heritage tests incoming hazardous wastes to determine whether they are incompatible with other materials stored at the facility, and to determine a location for storage, and a method and location for consolidation within the facility. All received and generated wastes and material are stored and managed in approved containers. Heritage does not operate a disposal unit onsite.

Quantities of Hazardous Waste Stored and Treated

The maximum volume of hazardous waste allowed to be stored in the Central Storage Area, the East Container Storage Area, the Lab Depack Storage Area, the DVSA, and the 800 Storage Area is 63,701 gallons. The maximum volume of hazardous waste allowed to be stored and treated in the Hazardous Roll-Off Storage area is 100 cubic yards.

Non-hazardous wastes may also be stored and consolidated within the storage areas so long as they are compatible with the hazardous waste; flammable and reactive wastes may not be stored within 50 feet of the property line; Heritage maintains a tracking system to monitor the quantity of hazardous wastes in each storage area.

IV. PERMIT DESCRIPTION AND STATEMENT OF BASIS

The draft permit renewal authorizes Heritage to continue to manage hazardous waste for a term of 10 years. At the end of the term, Heritage may apply for another permit renewal, or it may close its hazardous waste storage and treatment facility.

Incoming and outgoing hazardous waste may be stored for short periods of time (up to three days) within vans at the DVSA. Long-term storage (for periods up to one year) of containerized hazardous waste may be stored in the 800 Storage Area, the Central Storage Area, the East

Container Storage Area, and the Lab Depack Storage Area. Trucks with bulk loads may be stored at the DVSA for up to one year. Roll-off containers may continue to be managed in the Hazardous Roll-Off Storage Area. Overall, the hazardous waste storage capacity for the facility would increase by almost 25 percent upon issuance of the renewed permit.

The permit renewal also proposes changes in the facility inspections plan, recordkeeping requirements, procedures to prevent hazards, closure plan, and the closure cost estimate.

The draft permit consists of four parts and eleven attachments. All conditions are based on the Hazardous Waste Facility Permit Renewal Application dated September 29, 2008, with additional information and revisions provided by the applicant through March 27, 2013.

Permit Part I contains general permit conditions. These conditions are required by A.A.C. R18-8-270.A and L, as well as 40 CFR 270.30.

Permit Part II contains general facility conditions. These conditions are required by A.A.C. R18-8-264.A, R18-8-270.A, and 40 CFR 270.32. In addition, the Department has included the following Permit Conditions to this Part:

- II.J.5 – Beginning in 2015, Heritage must submit a biennial report prepared by a registered professional engineer that i) reviews the types and quantities of materials stored at the facility for the prior two years, and ii) based on that review, provides recommendations for improving Heritage’s compliance with the 2006 International Fire Code (IFC) and the 2006 International Building Code (IBC). The regulatory bases for this Permit Condition are 40 CFR 264.17 (General Requirements for ignitable, reactive, or incompatible wastes), 264.31 (Proper Facility Design and Operation), and 270.32(b)(1) and 270.32(b)(2) (Omnibus).
- II.J.6 – Heritage must submit a report each year of the equipment used to manage organic wastes with an organic concentration of at least 10 percent by weight. This information is required to be collected by 40 CFR 264.1064(g)(6).
- II.T. – The Permit includes a schedule of compliance Permit Condition requiring Heritage to complete four items within specified timeframes:
 - o Within 30 days of permit issuance, Heritage must increase the amount of financial assurance established for facility closure from \$421,395 to \$1,368,791. The regulatory bases for this Permit Condition are: 40 CFR 264.143 (Financial Assurance), and 270.33 (Schedules of Compliance).
 - o Within 90 days of permit issuance, Heritage must upgrade the containment of the Hazardous Roll-off Storage Area by adding a curb to minimize run-on of storm water and prevent run-off. Construction of the curb will be in accordance with designs contained in Attachment C of the Permit. The regulatory bases for this Permit Condition are: 40 CFR 264.31 (Proper Facility Design and Operation), 270.32(b)(1) and 270.32(b)(2) (Omnibus), and 270.33 (Schedules of Compliance).

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- Within 180 days of permit issuance, Heritage must conduct an engineering evaluation of the rail spur, base support, and containment of the Bulk Loading Area (BLA). In a recent inspection, ADEQ noted flaking metal and visible wear at the rail spur. In addition, accumulated liquid, likely from storm run-on and precipitation, was noted in the containment, making it difficult for inspectors to complete a visual examination of the facility. The regulatory bases for this Permit Condition are: 40 CFR 264.31 (Proper Facility Design and Operation), 270.32(b)(1) and 270.32(b)(2) (Omnibus) and 270.33 (Schedules of Compliance).
 - Within 90 days of permit issuance, the inventory management system must be updated to produce a daily report of the quantities of hazardous wastes stored in each container storage area, to demonstrate compliance with the IFC and IBC for the facility. The regulatory bases for this Permit Condition are: 40 CFR 264.17 (General Requirements for ignitable, reactive, or incompatible wastes), 264.31 (Proper Facility Design and Operation), and 270.32(b)(1) and 270.32(b)(2) (Omnibus).

Permit Part III contains specific conditions related to each waste management area at the facility. These conditions are required by A.A.C. R18-8-264.A (40 CFR 264, Subparts I and CC), R18-8-270.A and 40 CFR 270.32. In addition, the Department has included the following Permit Conditions to this Part:

- III.B.2 – The Permit establishes quantity limits on “non-regulated wastes” that are stored in the same container storage area with hazardous wastes. This Permit Condition promotes safer container management, more adequate and unobstructed aisle spacing, and adequate secondary containment. The bases for this Permit Condition are: 40 CFR 264.31 (Proper Facility Design and Operation), 264.35 (Aisle Spacing), 264 Subpart I (Container Requirements), 270.32(b)(1) and 270.32(b)(2) (Omnibus).
- III.B.5(c) – This Permit Condition prohibits the storage of biohazardous waste, mixed waste (wastes that are both hazardous and radioactive), polychlorinated biphenyls regulated by the Toxic Substances Control Act (TSCA), and DOT Class 1.1, 1.2, and 1.3 explosives. Proper handling of these wastes require specific state and federal approvals, specialized equipment onsite, and specialized expertise and training to properly inspect, monitor, and manage the waste, as well as issuance of specific regulatory approvals from ADEQ and EPA. Upon satisfactory demonstration of these requirements, the Permit would be amended to remove the restrictions. The bases for this Permit Condition are: 40 CFR 264.16 (Personnel Training), 264.31 (Proper Facility Design and Operation), 264.177 (Compatibility of Wastes), and 270.32(b)(2) (Omnibus).
- III.J – The Permit includes permit conditions regarding compatibility testing, bulking, blending, and consolidation of wastes:
 - Heritage must perform waste compatibility determinations under the supervision of a qualified professional such as a chemist or the environmental compliance manager (ECM), and must perform compatibility testing within the regulated storage areas. Such provisions are required in order to minimize the likelihood of fires or other adverse reactions when combining wastes. In addition, a qualified professional such as a chemist or the ECM is expected to have sufficient expertise to properly assess the

multitude of reactions that may occur when performing compatibility tests. The basis for this requirement includes ARS §49-922.B.5 which requires a hazardous waste operator to maintain sufficient expertise to perform hazardous waste storage and treatment activities. Additional regulatory bases are: 40 CFR 264.13 (General Waste Analysis), 264.17 (General Requirements for ignitable, reactive, or incompatible wastes), 264.31 (Proper Facility Design and Operation), and 270.32(b)(1) and 270.32(b)(2) (Omnibus).

- The consolidation, blending, and bulking of hazardous wastes must be performed under the direction of a qualified professional. Consolidation of hazardous waste may present increased risk in chemical reactions or the release of hazardous constituents to the environment. A qualified professional, such as a chemist or the ECM, is expected to have sufficient expertise to properly address such contingencies. As noted in the Personnel Training Plan (Permit Attachment F), the Hazardous Materials Technician/Material Handler position is not expected to have advanced knowledge of chemistry or chemical reactions. ADEQ therefore expects the qualified professional to oversee the consolidation processes. The basis for this requirement includes ARS §49-922.B.5 which requires a hazardous waste operator to maintain sufficient expertise to perform hazardous waste storage and treatment activities. Additional regulatory bases are: 40 CFR 264.31 (Proper Facility Design and Operation) and 270.32(b)(2) (Omnibus).
- Heritage may only consolidate or blend liquid wastes or bulk solid wastes within any of the regulated container storage areas or the Bulk Loading Area (BLA), except that bulk quantities of ignitable or reactive wastes may only be done at the BLA or the DVSA. As previously noted, consolidation and bulking of hazardous waste may present an increased risk of spills. The container storage areas and the BLA have been designed with adequate secondary containment. Limiting consolidation and bulking of ignitable and reactive waste to the BLA and the DVSA is appropriate as these areas are not enclosed, allowing for a more assured response to chemical reactions and releases of volatile vapors and liquids. These areas also have sufficient secondary containment to address spills, and adequate fire protection measures in the event of chemical reactions. The regulatory bases for these Permit Conditions are: 40 CFR 264.17 (General Requirements for ignitable, reactive, or incompatible wastes), 264.31 (Proper Facility Design and Operation), and 270.32(b)(1) and 270.32(b)(2) (Omnibus).
- Upon receipt, wastewater treatment sludge from electroplating operations (known as "F006 waste") that will be treated or blended onsite must be screened for cyanides, volatile organic compounds (VOCs), and free liquids. These screening methods are needed to ensure safe conditions for the treatment and blending of F006 waste. The cyanide and VOC screens reduce the likelihood of a release of volatile hazardous constituents in F006 wastes that may have been mismanaged, incompletely characterized, or improperly characterized at the point of generation. The free liquid screen is needed for two reasons. First, the Permit prohibits the storage, consolidation, or treatment of liquid waste in the Hazardous Roll-off Area. Second, the treatment and blending process used by Heritage for F006 waste is deemed inappropriate when

liquids are present. The bases for this Permit Condition are 40 CFR 264.13 (General Waste Analysis), 264.31 (Proper Facility Design and Operation), 264.175 (Containment), and 270.32(b)(2) (Omnibus).

- Heritage must demonstrate daily compliance with the 2006 International Fire Code (IFC) and the 2006 International Building Code (IBC) for hazardous waste stored at each container storage area. The IFC and IBC include tables summarizing exempt quantities of ignitable, flammable, water reactive, corrosive, toxic, and peroxides/oxidizers that may be stored in each area. The regulatory bases for this Permit Condition are: 40 CFR 264.17 (General Requirements for ignitable, reactive, or incompatible wastes), 264.31 (Proper Facility Design and Operation), and 270.32(b)(1) and 270.32(b)(2) (Omnibus).

Permit Part IV contains standard conditions regarding corrective action for Solid Waste Management Units (SWMUs). Heritage completed all mandatory investigations and cleanups; however, if any new releases occur or if ADEQ becomes aware of new information concerning historic releases, Heritage could be required to perform additional investigations and cleanups, and incorporate reports from the investigations into the Permit (at Attachment J – Corrective Action Schedule of Compliance – Approved Work Plans and Reports). The regulatory basis for corrective action are found in A.A.C. R18-8-264.A and 40 CFR 264.101 (Corrective Action for Solid Waste Management Units).

Permit Attachments

Attachment A – Facility Description

Attachment B – Waste Analysis Plan

Attachment C- Container Storage Plan

Attachment D – Procedures to Prevent Hazards

Attachment E – Contingency Plan

Attachment F – Personnel Training Program

Attachment G – Closure Plan

Attachment H – 40 CFR Part 264, Subpart CC (Organic Air Emissions from Containers)

Attachment I – Recordkeeping and Reporting

Attachment J – Corrective Action Schedule of Compliance – Approved Work Plans and Reports

Attachment K – Arizona Administrative Code

V. APPLICANT REQUESTED VARIANCES

None have been requested by the applicant.

VI. PUBLIC PARTICIPATION PROCESS - PROCEDURES FOR REACHING A FINAL DECISION ON THE PERMIT

The administrative record for the draft Permit contains all data submitted by the applicant. A copy of the draft Permit is available for public review at the Coolidge Public Library, 160 West Central Avenue, Coolidge, from Monday to Friday 8 a.m. – 6 p.m. and Saturday 8 a.m. – 1 p.m. The full administrative record is available at the ADEQ Phoenix office at 1110 W. Washington Street and may be viewed from 8:30 a.m. to 4:30 p.m., Monday – Friday (excluding state

holidays). To arrange an appointment to review this record at ADEQ, contact the ADEQ Records Center at (602) 771-4380.

As required by A.A.C. R18-8-271.L and 40 CFR §124.13, all persons, including applicants, who believe any condition of the draft Permit or the tentative decision to renew the existing Heritage Permit is inappropriate, must raise all reasonable ascertainable issues and submit all reasonably available arguments and supporting materials by the close of the public comment period. All comments submitted during the public comment period shall discuss the appropriateness of the draft Permit.

The 45-day public comment period will open on issuance of the public notice on August 11, 2013 and will close on September 25, 2013. During the public comment period, any interested person may submit written comments on the draft Permit. These comments and supporting materials must be delivered or postmarked by the last day of the public comment period to:

Arizona Department of Environmental Quality
Anthony Leverock – Manager
Hazardous Waste Permits Unit
1110 West Washington Street, Mail Code 4415C-1
Phoenix, Arizona 85007

All written comments delivered or postmarked by the last day of the public comment period will be considered in ADEQ's final determination regarding the draft Permit. After all comments have been considered, a final permit decision will be made by the Director. The applicant, each person who has submitted written or oral comments, and each person who has so requested will receive a notice of this final permit decision. This notice shall include reference to procedures for appealing a decision on a draft permit. The final permit decision shall become effective on the date specified in the final permit notice.

At the time that the final decision is made, the Director shall also issue a response to any significant comments. The response to comments shall consider all items as specified in A.A.C. R18-8-271.O and 40 CFR § 124.17. The response to comments shall be made available to the public for review. Any person who desires to be placed on the mailing list for all future permitting activities for this facility or for facilities in a specific geographic area may request so in writing to the above address, pursuant to A.A.C. R18-8-271.I(c)(1)(ix) and 40 CFR § 124.10(c)(1)(ix)(a).

In addition to submitting public comment, any person may request the Director to schedule a public hearing. **Written requests for a public hearing must be submitted to ADEQ by not later than close of the comment period, September 25, 2013 and must state the nature of the issues proposed to be raised in the hearing.** The Director will hold such a hearing if: 1) he finds, on the basis of requests, a significant degree of public interest in the draft Permit, or 2) he finds that the hearing might clarify one or more issues involved in the permit decision, or 3) a formal written notice of opposition to the draft Permit is received within the comment period.

If you would like a copy of the facility fact sheet or wish to be put on a mailing list for permit activity, you can make this request to the ADEQ contact person listed above. Please bring this notice to the attention of anybody who might be interested in this matter.

VII. PERSONS TO CONTACT FOR ADDITIONAL INFORMATION

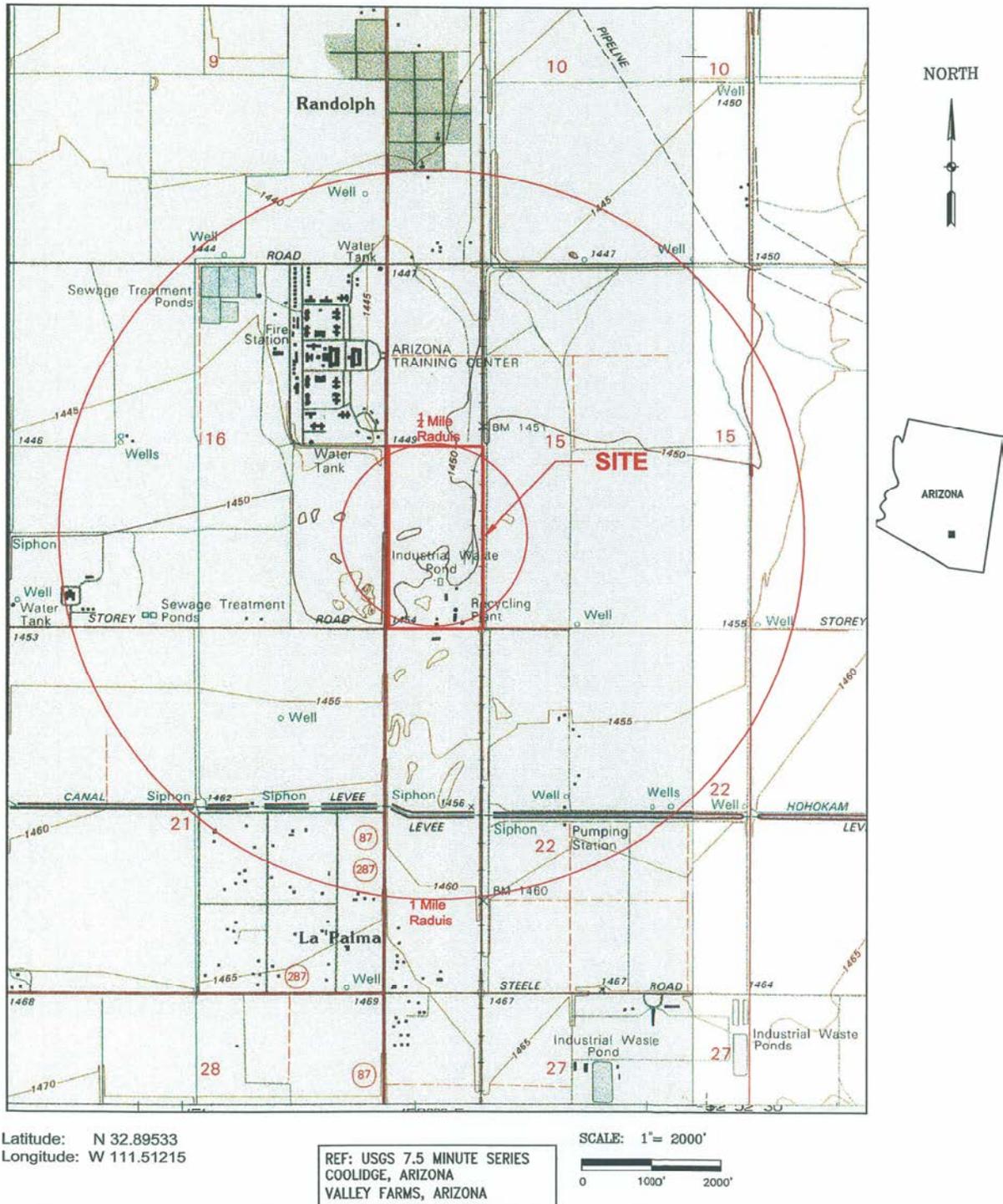
For additional information concerning the draft Permit, please contact:

Anthony Leverock – Manager
ADEQ - Hazardous Waste Permits Unit
1110 West Washington Street
Phoenix, Arizona 85007
E-mail: acl@azdeq.gov
(602) 771-4160 or Toll Free 1-800-234-5677, extension 7714160

Mark Shaffer ADEQ Communications Director
E-mail: ms15@azdeq.gov
(602) 771-2215

Hearing-impaired individuals call our TDD line:
(602) 771-4829

Web site: www.azdeq.gov



Project: Heritage Environmental Services, LLC 284 E. Storey Road Coolidge, Arizona 85128	
Scale: 1" = 2000'	Drawn By: RSC
Project Number: 81327	Approved By: MW
Date: Jan. 5, 2012	File No. USGS_COOL_SITE

SITE LOCATION MAP

Figure 1 – Site Location, Coolidge, Arizona

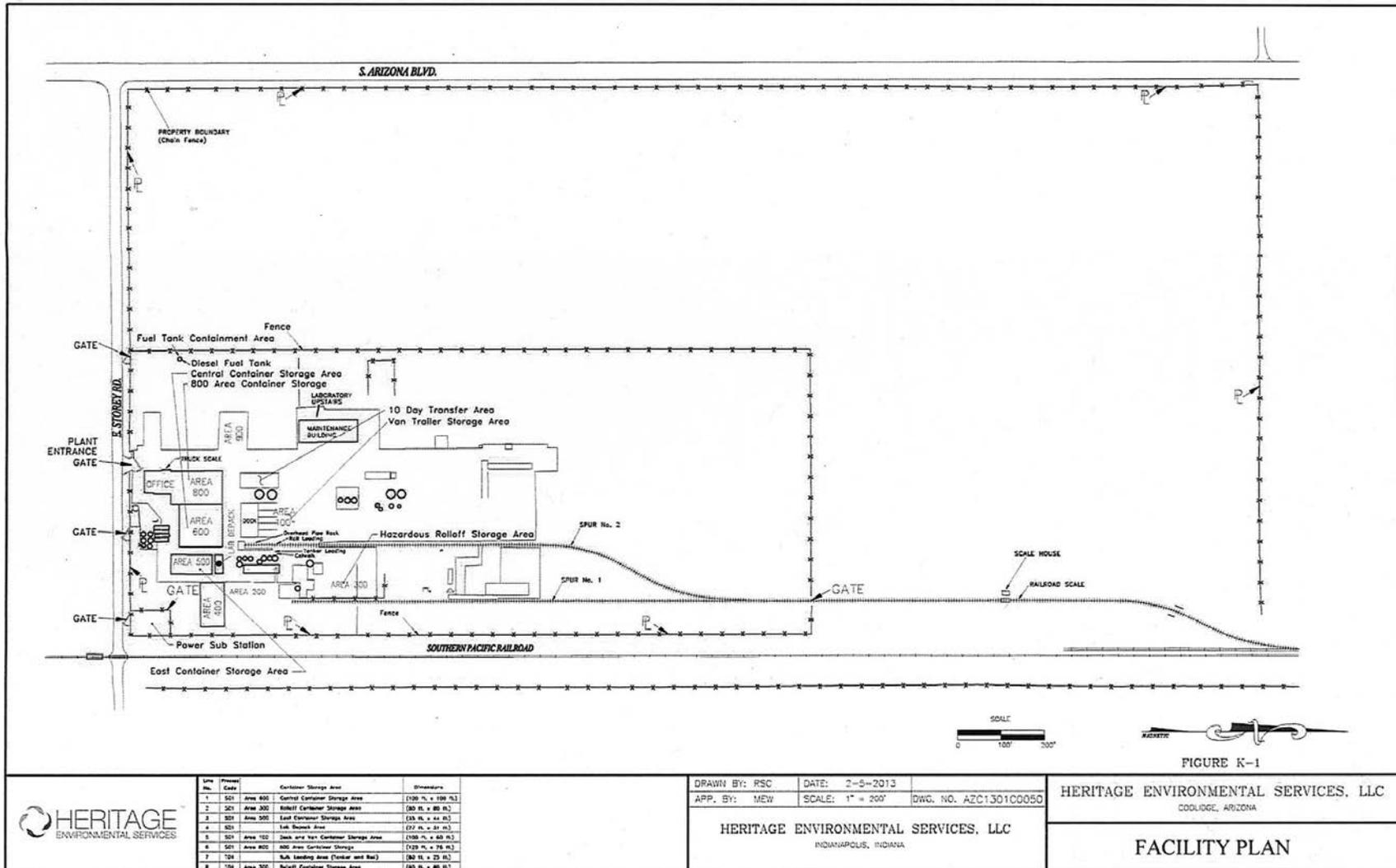


Figure 2 – Facility Plan for Heritage Environmental Services in Coolidge, Arizona.