

**ATTACHMENT K - CORRECTIVE ACTION
FOR SOLID WASTE MANAGEMENT
UNITS**

K. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

K-1 Solid Waste Management Units

Solid Waste Management Units ("SWMUs") at the facility were identified and described by an Arizona Department of Environmental Quality (ADEQ) contractor in an August 19, 1998 report entitled, *Final Draft RCRA Facility Assessment Report Proposed Heritage Environmental Services, Inc. Facility (Formerly Proler Recycling Facility)*, prepared by AJAY Environmental Consultants, Inc. (Chandler, AZ). The SWMUs addressed in the report are attributable to the activities of the previous facility owner (Proler Corporation), are not in operation, and have been investigated by Heritage. As specified in Part IV of the RCRA permit, a determination of No Further Action has been made by the ADEQ.

Currently, several SWMUs are actively operated at the Heritage facility. The SWMUs at the facility include container storage and waste handling areas. These units are permitted by the ADEQ in the facility's RCRA operating permit.

K-1a Characterize the Solid Waste Management Unit

Table K-1 provides a description for each SWMU and includes the following information:

- Description of the unit
- Unit identification
- Dimensions and materials of construction
- Dates of operation
- Description of wastes placed in each unit
- Quantity or volume of waste, if known

K-1(b) No Solid Waste Management Units

This section is not applicable to this permit application.

K-2 Releases

Heritage promptly reports all spills in accordance with permit or state and federal laws and regulations, including releases reported pursuant to CERCLA §103. These reports and any actions taken to respond to the spills are available for review at the ADEQ office. Most of the units that are designated as Solid Waste Management Units are also subject to permitting (in this application) as Hazardous Waste Management Units. These units are designed, operated, and maintained in such a manner to protect human health and the environment, in accordance with the requirements of 40 CFR Part 264 and corresponding regulations.

K-2a Characterize Releases

Based on a RCRA Facility Assessment performed by a contractor for the ADEQ, Heritage conducted a site investigation for suspected releases at the facility in accordance with the requirements of ADEQ-approved plans. The areas specified for investigation by the ADEQ were SWMUs identified as a result of operations occurring prior to Heritage ownership of the facility. As specified in Part IV of the RCRA permit, past releases have been comprehensively

investigated, and these releases do not pose a threat to human health or the environment. A determination of No Further Action has been made by the ADEQ for such past releases of hazardous waste and hazardous waste constituents.

K-3 Schedule of Implementation RCRA Facility Investigation

There are no Corrective Action activities scheduled at the facility.

**Table K-1
List of Solid Waste Management Units ⁽¹⁾**

Unit Designation	Type of Units	Approximate Capacity Dimensions	Units	Materials of Construction	Year Began Operations	Year Ceased Operation	Years Operating	Description of Waste	Comments
Central Container Storage Area	Container Storage	79,640	Gallons	Concrete Floor and Metal Building	1998	Present	25	See Permit	Constructed to RCRA (40 CFR Part 264) standards.
Dock and Van Storage Area	Container Storage	47,500	Gallons	Concrete Floor and Metal Building	1998	Present	25	See Permit	Constructed to RCRA (40 CFR Part 264) standards.
Roll-off Container Storage Area	Container Storage	100	CY	Concrete Floor and Masonry Walls	1998	Present	25	See Permit	Constructed to RCRA (40 CFR Part 264) standards
800 Area Container Storage	Container Storage	4,000	SF	Concrete Floor and Metal Building	1998	Present	25	See Permit	Constructed to RCRA (40 CFR Part 264) standards
Tank 1	Tank System	24,953	Gallons	Fiberglass with Concrete Secondary Containment	1998	Present	25	Used Oil	
Tank 2	Tank System	24,953	Gallons	Fiberglass with Concrete Secondary Containment	1998	Present	25	Used Oil	
Tank 3	Tank System	24,953	Gallons	Fiberglass with Concrete Secondary Containment	1998	Present	25	Used Oil	
TK3006	Tank System	7,000	Gallons	Fiberglass Reinforced Plastic with Concrete Secondary Containment	1998	Present	25	Non-Hazardous Liquid	Emptied and cleaned.
TK3007	Tank System	7,000	Gallons	Fiberglass Reinforced Plastic with Concrete Secondary Containment	1998	Present	25	Non-Hazardous Liquid	Emptied and cleaned.

(1) For other units identified as Solid Waste Management Units prior to Heritage ownership, see *Final Draft RCRA Facility Assessment Report Proposed Heritage Environmental Services, Inc. Facility (Formerly Proler Recycling Facility)*, prepared by AJAY Environmental Consultants, Inc. (Chandler, AZ) on behalf of the ADEQ.