

CLEAN HARBORS ARIZONA, LLC HAZARDOUS WASTE STORAGE PERMIT RENEWAL

EPA ID: AZD 049 318 009
1340 W. LINCOLN ST.
PHOENIX, ARIZONA
LTF ID: 76672

This fact sheet was prepared in accordance with 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 A.A.C. hereafter refer to A.A.C. R18-8-260 et. seq., as amended effective March 1, 2019, and as published in Vol 25, Issue 9 Arizona Administrative Register (A.A.R.) [Page 435], which incorporates and/or modifies parts of Title 40 Code of Federal Regulations (CFR) Parts 260 et. seq.

The Arizona Department of Environmental Quality (ADEQ) has prepared a draft hazardous waste permit renewal for Clean Harbors Arizona, LLC (Clean Harbors). The draft permit proposes to allow Clean Harbors to continue operating its existing hazardous waste storage facility located at 1340 West Lincoln Street, Phoenix, Arizona 85007 (see Figure 1) for 10 years. The facility was originally permitted to operate in 2010, and currently operates pursuant to a hazardous waste permit approved on June 28, 2010.

Figure 1 — Site Location



Facility Description

The Clean Harbors facility is an existing hazardous waste storage facility that receives a variety of hazardous and non-hazardous wastes. Incoming wastes are segregated, consolidated, and prepared for shipment to other treatment, storage, and disposal facilities, or recyclers.

The facility is situated on a 2.3 acre parcel. It consists of a single-story building that contains an enclosed office area and a maintenance office. To the east of the building are the waste management units. Waste management activities performed at Clean Harbors include:

- **Container storage areas** — Clean Harbors has six container storage areas (CSA), designated as CSA-I, CSA-II, CSA-IV, CSA-V, CSA-VI, and CSA-VII. These areas may store hazardous or non-hazardous wastes;
- **Tank storage area** — Clean Harbors has 4 above-ground hazardous waste storage tanks on-site. These tanks are designated as, T104, T301, T302, and T303. Clean Harbors also has nine above-ground non-hazardous waste storage tanks: T201, T401, T601, T602, T701, T702, T703, T704, and T705;
- **Roll off storage area** — Clean Harbors has provision to store waste in roll off bins. These bins may contain hazardous waste solids, non-hazardous waste solids, or lab packs;
- **Work stations** — Clean Harbors has four work stations, designated as WS-I, WS-II, WS-III, and WS-IV. The work stations are used for bulking and consolidation of liquid containerized waste into a storage tank within the tank farm; bulking, consolidation and repacking of lab packs for transfer off-site to other treatment, storage, and disposal facilities; bulking, consolidation, and distribution of household hazardous waste (HHW); and storage of containers of hazardous and non-hazardous waste;
- **Loading dock** — The loading dock is capable of parking four trucks at a time and staging waste during the loading and unloading process during operating hours;

- **Staging area** — The staging area receives and prepares for shipment hazardous and non-hazardous wastes to the work stations, storage areas, or other treatment, storage, and disposal facilities;

There is also an office trailer on the eastern edge of the facility that is set up as office space, and includes a laboratory for testing incoming materials.

There are no hazardous waste landfills, waste piles, surface impoundments, and land treatment units in the facility.

Site History

The Clean Harbors facility was operating as a commercial hazardous waste facility when the Federal Resource Conservation and Recovery Act (RCRA) was enacted and first filed for Interim Status under RCRA in 1980. In May of 1993, Laidlaw Environmental Services of California purchased the facility, then named Recycling Resources, Inc., from Disposal Control Services, Inc. On Sept. 1, 1994, the facility registered to do business in the State of Arizona as Laidlaw Environmental Services, Southwest, and the name Recycling Resources, Inc. was retired. On July 1, 1998, Laidlaw Environmental Services, Inc. and all subsidiaries legally changed their name to Safety-Kleen Corporation, Inc. Finally, on Sept. 6, 2002, the facility was acquired by Clean Harbors Environmental Services, Inc. and again changed its name to the current name of Clean Harbors Arizona, LLC.

As part of the current operating permit, Clean Harbors investigated onsite soils and groundwater. A corrective measures study was performed, followed by a corrective measures implementation work plan being developed and carried out.

Type and Quantity of Hazardous Wastes Managed

Types of Hazardous Wastes (40 CFR § 261, Subpart C & D)

The facility typically receives wastes from off-site generators via commercial hazardous waste transporters or its own transportation fleet. 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.

Representative clients for Clean Harbors include: industrial facilities, manufacturing plants, oil companies, chemical manufacturers, institutions such as hospitals, schools, and universities, research and development facilities, government agencies, emergency response actions, remedial action sites, and household hazardous waste (HHW) collection events.

Typical wastes accepted by Clean Harbors include acids, alkalines, flammables/organics, oxidizers, poisons/pesticides and reactives. Wastes that are not accepted at the facility are radioactive wastes, wastes that are thermally unstable at ambient temperatures, DOT Class 1 explosives, and Toxic Substances Control Act (TSCA) Polychlorinated biphenyls (PCBs) in quantities greater than 500 gallons at a concentration greater than 50 parts per million (ppm).

More specific information on the waste types (and waste codes) and storage areas can be found in the draft Permit in Section III, "Container Storage"; Section IV, "Tank Storage"; and Permit Attachment C, "Waste Characteristics", and in the federal hazardous waste rules at 40 CFR §261 Subpart C, "Characteristics of Hazardous Wastes" and 40 CFR §261 Subpart D, "Lists of Hazardous Waste."

Clean Harbors generates hazardous and non-hazardous wastes that are consolidated on-site or shipped off-site via commercial transporters or its own transportation fleet to permitted treatment, storage or disposal facilities. The wastes generated at Clean Harbors consist of laboratory sample residues and empty containers that the facility has bulked or lab-packed into DOT-approved containers for off-site treatment; clean-up residues and wash waters from the facility; Volatile Organic Compound (VOC) laden carbon; and personal protective equipment.

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

Quantity of Hazardous Wastes

The maximum volume of hazardous waste allowed to be stored in containers, in designated storage areas, and work stations is 75,000 gallons.

Four above-ground storage tanks may hold a maximum of 35,180 gallons of hazardous waste.

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; Clean Harbors maintains a tracking system to monitor the quantity of hazardous wastes in each storage area.

The draft permit authorizes storage of hazardous waste in tanks and containers. The draft permit has a term of 10 years. At the end of the term, Clean Harbors may apply for renewal in order to continue facility operations.

Summary of Basis for Draft Permit Conditions

The draft permit consists of five parts and 11 attachments. All conditions are based on the Hazardous Waste Storage Facility Part B Permit Application dated Dec. 19, 2019, with additional information and revisions provided by the applicant through March 23, 2020.

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 and 40 CFR 270.32.

Permit Part III contains specific conditions related to container storage areas, workstations, and container management. These conditions are required by A.A.C. R18-8-264.A (40 CFR 264, Subparts I and CC)

Permit Part IV contains specific conditions related to the tank storage area, tank controls, and management of the tanks and tank area. These conditions are required by A.A.C. R18-8-264.A (40 CFR 264, Subparts J, BB, and CC).

Permit Part V contains conditions regarding corrective action for Solid Waste Management Units (SWMUs), including a Schedule of Compliance. Corrective action is authorized by the Arizona Revised Statutes §49-922.B and Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments. The regulatory basis for corrective action can be found in A.A.C. R18-8-264.A and 40 CFR 264.101.

Permit Attachments

- Attachment A — List of Hazardous Waste Codes
- Attachment B — Facility Description
- Attachment C — Waste Characteristics
- Attachment D — Process Information
- Attachment E — Air Emissions
- Attachment F — Procedures to Prevent Hazards
- Attachment G — Contingency Plan
- Attachment H — Personnel Training
- Attachment I — Closure and Post-Closure Plan
- Attachment J — Reserved
- Attachment K — Arizona Administrative Code
- Attachment L — Corrective Action Schedule of Compliance — Approved Work Plans and Reports

Director-Established Permit Conditions

As required by A.A.C. R18-8-270.A, M, N, and O (40 CFR 270.32), the Director has established site-specific permit conditions as necessary to conform with state and federal rules and

regulations. These conditions, known as Omnibus Conditions are as follows:

- *II.I.5 - List of Learning Sites* — Clean Harbors must maintain a contact list of K-12 public and private schools within 1.0 mile of the facility, and provide the list to the fire department when requested and when the emergency provisions of the Contingency Plan are implemented by Clean Harbors.
- *II.R - Transportation Routes for Hazardous Waste Shipments* — Clean Harbors shall instruct each hazardous waste transporter to avoid, as much as is practicable, the use of any routes that pass through residential areas or that pass by schools.
- *IV.F.4 - Tank Reinspection* — Clean Harbors must reinspect Tanks 104, 301, 302, and 303 at least once every two (2) years following the issuance of the Permit. The inspection report shall be retained in the facility operating record and must be certified by a registered professional engineer of an appropriate discipline. The re-inspection shall be in accordance with API Standard 653 and shall be comprehensive enough to provide a better estimate of tank life and/or when mitigation measures will be required. The inspection frequency may be reduced with the Director's approval based on the recommendations of a professional engineer after sufficient data have been collected and a corrosion rate under typical use has been established.

Applicant-Requested Variances

None have been requested by the applicant.

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 and is available for public inspection Monday – Friday (excluding state holidays) from 8:30 a.m. – 4 p.m. at the ADEQ address given below. To arrange an appointment to review this record at ADEQ, contact the ADEQ Records Center at 602-771-4380.

Arizona Department of Environmental Quality
Records Management Center
1110 W. Washington St., 1st Floor
Phoenix, Arizona 85007

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 prepare and issue this draft 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 April 19, 2020, and will close on June 3, 2020. 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 (i.e., June 3, 2020) to:

Arizona Department of Environmental Quality
Mary Cottrell
Hazardous Waste Permits and Support
1110 W. Washington St.
Phoenix, Arizona 85007

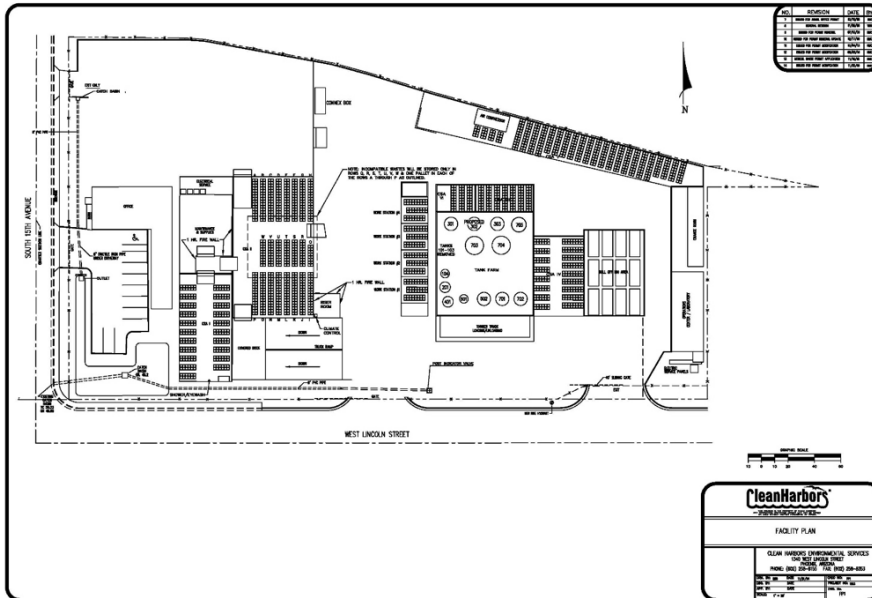
All written comments delivered or postmarked by the last day of the public comment period will be considered in ADEQ's final determination regarding the draft permit. After all comments have been considered, a final permit decision will be made by the Director. The applicant, each person who has submitted 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 ADEQ Director schedule a public hearing. Written requests for a public hearing must be submitted to ADEQ by not later than close of the comment period, June 3, 2020 and must state the nature of the issues proposed to be raised in the hearing.

Figure 2 — Site Plan



Contact

For more information:
Mary Cottrell
Cottrell.Mary@azdeq.gov
ADEQ Hazardous Waste Permits & Support Unit
1110 W. Washington St.
Phoenix, Arizona 85007
602-771-4168 (Phoenix area)
800-234-5677, extension 771-4168 (statewide)

ADEQ will take reasonable measures to provide access to department services to individuals with limited ability to speak, write or understand English and/or to those with disabilities. Requests for language interpretation, ASL interpretation, CART captioning services or disability accommodations must be made at least 48 hours in advance by contacting Ian Bingham, Title VI Nondiscrimination Coordinator at 602-771-4322 or bingham.ian@azdeq.gov. Teleprinter services are available by calling 7-1-1 at least 48 hours in advance to make necessary arrangements.

ADEQ tomará las medidas razonables para proveer acceso a los servicios del departamento a personas con capacidad limitada para hablar, escribir o entender inglés y / o para personas con discapacidades. Las solicitudes de servicios de interpretación de idiomas, interpretación ASL, subtítulos de CART, o adaptaciones por discapacidad deben realizarse con al menos 48 horas de anticipación contactando a Ian Bingham, Coordinador de Anti-Discriminación del Título VI al 602-771-4322 o bingham.ian@azdeq.gov. Los servicios de teleimpresores están disponibles llamando al 7-1-1 con al menos 48 horas de anticipación para hacer los arreglos necesarios.