

**HERITAGE ENVIRONMENTAL SERVICES, LLC
HAZARDOUS WASTE MANAGEMENT PERMIT
EPA I.D. NO. AZD081705402
284 E. STOREY ROAD
COOLIDGE, ARIZONA 85128**

LTF ID #99093

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., as amended in Supplement 23-1, effective March 31, 2023, 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 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 last renewed December 2, 2013.

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 seven 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), the 800 Storage Area, and the Bulk Loading Area (BLA). 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, the 800 Storage Area, and the BLA is 84,601 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 to facilitate waste transfers. 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, BLA, 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. At the BLA, permitted storage related to the maximum allowable capacity for inbound shipments will commence after a railcar or tanker truck is present in the BLA for 3 operating days.

The draft permit consists of four parts and twelve attachments. All conditions are based on the Hazardous Waste Facility Permit Renewal Application dated June 5, 2023, with additional information and revisions provided by the applicant through May 1, 2024.

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 – By March 1 of each calendar year Heritage must submit a report on the equipment used to manage organic wastes with an organic concentration of at least 10 percent by weight for the previous calendar year. This information is required to be collected by 40 CFR 264.1064(g)(6).
- II.J.6 - By March 1 of each calendar year Heritage must submit an operating record and status report on Mercury Export Ban Act (MEBA) related materials. This shall be certified per 40 CFR 270.11(d). The operating record shall include quantity (gallons or pounds), number of containers, container IDs, date of receipt, location of storage. The status report shall include all items listed in the above operating record, containers removed from long-term storage, date of removal from long-term storage, date containers are shipped offsite, shipment documentation, identification of recipient of MEBA related materials. The regulatory bases for this permit condition are: A.A.C. R18-8-270.A and 40 CFR 270.32(b)(1) and 270.32(b)(2) (Omnibus)
- II.T. – The Permit includes a schedule of compliance Permit Condition requiring Heritage to complete four items within specified timeframes:
 - Within 45 days of Permit Issuance, Heritage shall submit a Class 1* Permit Modification request, requiring Director approval, updating the Corrective Action Schedule of Compliance (Permit Attachment K) to include a RCRA Facility Investigation (RFI) workplan for the onsite septic system solid waste management unit (Septic System RFI). The Septic System RFI shall include sampling and analysis and contingent corrective measures implementation (CMI) workplans, detailing the following:
 - Characterization of the contents of the septic tank, soils under the pipe discharging to the septic system, soils under the septic tank, and soils in the drain field.
 - A contingent closure plan if the contents of the tank contain hazardous constituents in sufficient quantities to cause contamination of soils or groundwater;

- A contingent corrective action workplan if soils underlying the septic system are found to exceed Arizona Soil Remediation Standards, or might cause groundwater contamination.
- A schedule for implementation of the Septic System RFI Workplan, implementation of the contingent closure and corrective action workplans, and submittal of a final report.

The regulatory bases for this permit condition are: A.A.C. R18-8-264.A and -270.A and 40 CFR 264.111 (Closure performance standard), 270.32(b)(2) (Omnibus) and 270.33 (Schedules of Compliance).

- Within 60 days of Permit Issuance, Heritage shall submit a Class 1* Permit Modification request requiring Director approval, to include a guide on their written procedures (SOP) for the management of precipitation that accumulates in secondary containment systems. The SOP shall follow the guidelines of the ADEQ's General Precipitation Management Guidance contained in Permit Attachment C, Exhibit C-1. The regulatory bases for this permit condition are: A.A.C. R18-8-264.A and -270.A and 40 CFR §264.175 (Use and Management of Containers - Containment), §270.15 (Part B Information Requirements for Containers), §270.32(b)(2) (Omnibus) and §270.33 (Schedules of Compliance).
- Within 90 days of Permit Issuance, Heritage shall submit a Class 1* Permit Modification request requiring Director approval, to include a standard operating procedure to describe the treatment process of fuel blending. The SOP shall include detailed process information, an identification of the required fuel blending criteria, the equipment used to perform the fuel blending, and an identification of the inspection program that will be used to ensure that leaks are prevented. The regulatory bases for this permit condition are: A.A.C. R18-8-270.A and 40 CFR §270.15 (Part B Information Requirements for Containers), §270.25 (Part B Information Requirements for Equipment), §270.27 (Part B Information Requirements for Air Emission Controls for Containers), §270.32(b)(2) (Omnibus) and §270.33 (Schedules of Compliance).
- Within 180 days of Permit Issuance, Heritage shall update the Waste Analysis Plan (WAP, Permit Attachment B) to include supplemental verification sampling ("Stage 3 Testing") of hazardous wastes received for storage and treatment. The update to the WAP shall be submitted as a Class 1* Permit Modification Request, requiring Director approval. The regulatory bases for this permit condition are: R18-8-264.A and -270.A and 40 CFR §264.13(a)(1) (Waste Analysis), §270.14(a)(3) (Part B Information Requirements for Waste Analysis Plans), §270.32(b)(2) (Omnibus) and §270.33 (Schedules of Compliance).

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: A.A.C. R18-8-264.A and -270.A and 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: A.A.C. R18-8-264.A and -270.A and 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.B.5(d) - Large-format lithium ion batteries are listed in Permit Attachment B, Waste Analysis Plan, Section 4.4 as prohibited. Heritage may accept and store large-format lithium ion batteries only if upon initial acceptance of that waste stream they submit a fire safety assessment prepared by a qualified engineer. Based on the qualified engineer’s findings and recommendations, Heritage must upgrade the facility’s fire safety controls to comply with the recommendations within 180 days of the Director’s approval of the recommendations. Upon the Director’s approval, Permit Attachment B will be updated to remove large-format lithium ion batteries from the list of prohibited waste. The bases for this Permit Condition are: A.A.C. R18-8-264.A and -270.A and 40 CFR 264.31 (Proper Facility Design and Operation), 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 required 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: R18-8-264.A and -270.A and 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 required 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: A.A.C. R18-8-264.A and -270.A and 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 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: A.A.C. R18-8-264.A and -270.A and 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 A.A.C. R18-8-264.A and -270.A and 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: A.A.C. R18-8-264.A and -270.A and 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 has completed all required 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 K – 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 and Consolidation 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 BB (Air Emissions Standards for Equipment Leaks)

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

Attachment J – Recordkeeping and Reporting

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

Attachment L – 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. 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 June 6, 2024 and will close on July 20, 2024. 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
Josie Poler - Permit Writer
Hazardous Waste Permits Unit
1110 West Washington Street
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, July 20, 2024 and must state the nature of**

the issues proposed to be raised in the hearing. The Director will hold such a hearing if: 1) they find, on the basis of requests, a significant degree of public interest in the draft Permit, or 2) they find 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:

Josie Poler - Permit Writer
ADEQ - Hazardous Waste Permits Unit
1110 West Washington Street
Phoenix, Arizona 85007
E-mail: HazWastePermits@azdeq.gov
(602) 771-0349

ADEQ Communications Office
E-mail: communications@azdeq.gov

Hearing-impaired individuals call our TDD line:
(602) 771-4829
Web site: www.azdeq.gov

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 translation, ASL interpretation, CART captioning services or disability accommodations must be made at least 48 hours in advance by contacting the Title VI Nondiscrimination Coordinator, Leonard Drago, at 602-771-2288 or Drago.Leonard@azdeq.gov. For a TTY or other device, Telecommunications Relay Services are available by calling 711.

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 traducción de idiomas, interpretación ASL (lengua de signos americano), subtítulo de CART, o adaptaciones por discapacidad deben realizarse con al menos 48 horas de anticipación comunicándose con el Coordinador de Anti-Discriminación del Título VI al 602-771-2288 o Drago.Leonard@azdeq.gov. Para un TTY u otro dispositivo, los servicios de retransmisión de telecomunicaciones están disponible llamando al 711.



Figure 1: Location of the Facility

