ATTACHMENT F

AA SYDCOL, LLC

PROCEDURES TO PREVENT HAZARDS

[40 CFR 270.14(b)(4) and (5))]

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Table of Contents

1.0 Introduction 1

2.0 Security 3

2.1 Security Procedures and Equipment 3

2.2 24-Hour Surveillance System 4

2.3 Barrier and Prevention of Unauthorized Entry 4

2.4 Warning Signs 4

2.5 Injury to Intruder 5

2.6 Violation Caused by Intruder 5

3.0 Inspection Schedule 6

3.1 General Inspection Requirements 6

3.1.1. Daily Inspections 7

3.1.2. Weekly Inspections 8

3.1.3. Monthly Inspections 8

3.1.4. Quarterly and Annual Inspections 8

3.1.5. Types of Problems and Inspection Frequency 9

3.2 Specific Process Inspection Requirements 10

3.3 Container Inspection 10

4.0 Preparedness And Prevention Requirements 13

4.1 Equipment Requirements 13

4.1.1. Internal Communications 13

4.1.2. External Communications 14

4.1.3. Emergency Equipment 14

4.1.4. Fire and Water Control 15

4.1.5. Testing and Maintenance of Equipment 15

4.1.6. Access to Communication or Alarm System 16

4.2 Aisle Space Requirement 16

4.3 Documentation of Outside Response Arrangements 16

4.3.1. Police and Fire Departments 16

4.3.2. Emergency Response Teams 17

4.3.3. Local Hospitals 17

4.3.4. Document Agreement Refusal 17

5.0 Prevention Procedures, Structures, and Equipment 19

5.1 Unloading Procedures 19

5.2 Runoff Prevention 20

5.3 Protection of Water Supplies 21

5.4 Equipment and Power Failure 22

5.5 Personal Protection Procedures 23

5.6 Procedures to Minimize Releases to the Atmosphere 23

6.0 Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste 25

6.1 General Precautions of Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste 25

6.2 Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes 25

6.3 Documentation of Adequacy of Procedures 26

6.4 Management of Ignitable or Reactive Wastes in Containers 26

Table

1. List of Safety, Emergency, and Monitoring Equipment

Figures

1. Site Location Map

2. Site Plan

Appendices

A. Inspection Log

B. Daily Inspection Report

C. Weekly/Monthly Inspection Report

D. Quarterly Inspection Report

E. Notice to Authorities

1.0 INTRODUCTION

This description of procedures to prevent and address hazards at the Facility has been prepared in support of the Sydcol RCRA Part B permit application. A list of all acronyms and a definition of key terms used in this description is provided with General Information provided in Appendix A of Attachment A of the RCRA Part B permit application.

The Facility is a hazardous and non-hazardous waste transfer station located in Yuma, Arizona at the location shown in Figure 1. The Facility accepts a variety of hazardous and non-hazardous wastes; classifies the wastes and consolidates, bulks, and repackages the wastes for shipment to approved off-site reuse, treatment, and/or disposal facilities. Non-hazardous solid waste operations at the Facility consist of transfer station activities with two areas designated for solid waste handling: the western 75 feet of the Facility, the northern 185 feet of the Facility, and the concrete pad at the northern end of the Facility, and the concrete pad in the warehouse building. Three areas in the southern portion of the Facility are used as a transfer station for hazardous wastes and are designated as HWMUs. Figure 2 illustrates the waste management units at the Facility. This section describes the procedures used at the Facility to prevent hazards associated with storage and processing of hazardous waste.

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2.0 SECURITY

AA Sydcol has developed security provisions to minimize the potential for unauthorized contact with and exposure to the wastes stored and processed at the Facility. The Facility is not open to the public and entry to active waste management areas is limited to employees, waste transportation personnel, and escorted visitors. The Site Plan provided in Figure 2 illustrates the solid and hazardous waste management units, property lines, security fences, entry gates, and the location of warning signs is presented in Figure 2.

2.1 Security Procedures and Equipment

Multiple measures of security are used at the Facility during operating and non-operating hours. These measures include perimeter fencing, limited access, lighting, security cameras, signage, building alarms, and third-party monitoring.

The perimeter of the entire Facility is delineated with a six-foot high chain-link fence topped with 3-stranded barb wire mounted on 45-degree angle arms on the north, east, and south property boundaries and vertical arms on the west property boundary. Access to the Facility is limited to one gated entry located along 13th Street. The access gate is kept locked when the Facility is closed such that the entire Facility is surrounded by a barrier fence. A second emergency gate is located on the southeast corner of the property and is kept locked at all times. The gate is a fire gate, or "crash-through" gate, by which emergency responders can gain access to the site by crashing the gate in an emergency. The perimeter fence and access gates are kept free of trees that may take root and that could compromise the fence or its foundations.

Signage posted at the Facility entrance will identify the Facility, operating hours, and direct all entrants to report to the main building for checking into the Facility. All visitors or other entrants will be required to sign in and be given the safety and security procedures for the Facility. Any on-site visitors are accompanied at all times by Facility personnel. Visitors are required to sign out upon leaving the Facility. Vehicle speed limits are posted at the Facility entrance, and limited to 15 miles per hour while on the Facility property. A 6-inch layer of 3-inch minus aggregate base course rock will be placed for 50 feet in the approach to the entrance gate for traffic exiting the facility and in front of the loading docks on the south side of the warehouse building to control trackout as shown in Figure 2. Overhead lights are located at the entrance gate, on the north and south sides of the main building, and at HWMU1, HWMU2, and HWMU3. Light sensors control the operation of the overhead lighting at the Facility so it is illuminated from dusk until dawn.

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The typical operating hours at the Facility are 7:00 A.M. to 4:00 P.M., Monday through Friday. Operations may be conducted on evenings and the weekends, if needed. In the event of an evacuation, facility personnel will control access to the Facility as described in the Evacuation Plan in the Contingency Plan.

2.2 24-Hour Surveillance System

Outside of operating hours, a combination of remotely monitored surveillance equipment are used to secure the Facility. The monitoring equipment includes security cameras and motion detectors monitored intermittently by the Facility Manager. The surveillance system includes 17 weather-proof 2.0 megapixel bullet IP full HD real time day/night 2.8-12mm lens video cameras that are strategically located throughout the Facility. The security cameras cover the entire property. all corners of warehouse, office, parking lot, shop area, truck loading and unloading area, access driveway and main gate. Video recording from the security cameras is maintained on-site for a minimum of 10 days. Motion sensors are also located at key positions around the Facility and inside the main building to cover the main gate, office areas, and the warehouse building. When the motion detectors are triggered after hours, the offsite third-party security company is alerted to observe the video cameras to identify the cause. Any concerns that need further investigation are immediately called to the Emergency Coordinator or an alternate Emergency Coordinator on call to investigate the situation.

2.3 Barrier and Prevention of Unauthorized Entry

A chain link fence 6 feet in height with 3-strand barbed wire suspended on mounting arms surrounds the Facility. Site access is provided at a gated entrance on the south side of the Facility from 13th Street. The main gate is kept closed and locked at all times unless authorized vehicles are entering the facility. Signage at the entrance gate identifies the office number to call for access to the Facility. Transporters must contact the administrative office to gain access during operating hours. The access gate is kept locked outside of operating hours. An additional emergency gate is located on the southeast corner of the Facility and kept locked at all times. Figure 2 shows the location of fences and gate at the Facility.

2.4 Warning Signs

Warning signs are posted at the entry gate and along the publicly-accessible perimeter fencing used to secure the Facility along the north, east, and south property boundaries at 100-foot spacing intervals so as to be visible from any approach. Warning signs are printed in English and Spanish with a minimum 2½-inch letters to be legible from a distance of at least 30 feet. The signs read as follows:

DANGER	**PELIGRO**
UNAUTHORIZED	**PROHIBIDA LA ENTRADA**
PERSONNEL	**A PERSONAS**
KEEP OUT	**NO AUTORIZADAS**

2.5 Injury to Intruder

Injury to an unauthorized intruder is limited because all hazardous waste at the Facility is received, stored, and processed in various size containers, all of which are labelled and kept closed except during sampling and consolidation activities. All equipment is parked and locked after operating hours.

2.6 Violation Caused by Intruder

Releases caused by an intruder would be minimized because containers are within secondary containment areas that are lighted and monitored by a surveillance system.

3.0 INSPECTION SCHEDULE

AA Sydcol has developed an inspection program for the Facility that provides for discovery, investigation, and repair/remediation of hazards to prevent harm to human health and the environment. The program is integrated with the normal course of duties carried out by Facility personnel so possible issues are identified and resolved quickly and efficiently. All employees are responsible for reporting or correcting (if appropriate) any non-conforming issue upon discovery. Non-emergency issues discovered by Facility personnel may not be recorded on a formalized Inspection Report if the issue can be corrected before a formalized inspection could be completed.

3.1 General Inspection Requirements

Inspections will be conducted by personnel appropriately trained for the inspection. Hazardous Waste Technicians, Facility Supervisors, and the Facility Manager will be trained to conduct inspections of the waste containment systems, the security system, and operation of the fire suppression system.

All inspections will be documented. Inspection records will include an Inspection Log and Inspection Reports. The Inspection Log will be used to record all inspections and track any issues identified in an inspection. Information on the Inspection Log includes date, time, name of person conducted the inspection, type of inspection; and any issues identified during the inspection. along with a follow-up date to inspect repairs or other remedial work. The Facility Manager will review the Inspection Log weekly and track issues identified during inspections to assure that remedial work is complete. A copy of the Inspection Log is Provided in Appendix A.

Findings made during an inspection will be recorded on Inspection Reports, which will document the date and time of the inspection along with a checklist of items inspected. The Inspection Report will also identify the person who performed the inspection and provide details of any issues identified; dates and description of any repairs and/or remedial actions taken; and describe the final resolution for the issue. Typical information on an Inspection Report for a container issue would include the container identification number, the location of the container (HWMU and row number), and a description of the issue. All identified releases are to be documented in the Inspection Report. If similar issues are identified in an inspection, such as damaged labels, the report would include information on all of the container labels that are damaged and note that new labels were generated to correct the issue. All Inspection Reports are reviewed by the Facility Manager.

If inspections reveal that non-emergency maintenance and repair is needed, the issue will be addressed as soon as possible to preclude further issues and reduce the need for emergency repairs. If an inspection reveals an issue that is considered an imminent hazard, remedial action will be

taken immediately in accordance with the procedures outlined in the Contingency Plan in Attachment G. In the event of an uncontrolled release of hazardous waste, all efforts will be directed toward containment. Facility inspection records may change based on changes in regulations, changes in operations at the Facility, or following modification of the facility hazardous waste permit.

The records may be maintained and stored electronically. Hard copies of the inspection records will be maintained for a minimum of 3 years from the date of the inspection.

There are five types of inspections conducted at the Facility based on the frequency of the inspection; daily (during days of operation), weekly, monthly, quarterly, and annual. Daily inspections will include containers and containment systems. Weekly inspections will be conducted on safety and emergency response equipment. Monthly inspections will be conducted on Facility security measures, including an inspection for damage to security cameras and motion detectors. Quarterly inspections will be conducted on fire suppression system monitoring and laboratory equipment used at the Facility. The 3rd-party service provider for the security system performs a quarterly inspection and tests the operation of all security cameras and motion detectors. Annual inspections will include testing of the fire suppression system.

3.1.1. Daily Inspections

HWMU1, HWMU2, and HWMU3 are inspected each day the Facility is operating. Daily inspections will include inspection of containers for indications of leakage and deterioration. leaks and spills, cracking, deterioration, and other signs of possible loss of integrity. The concrete surfaces and containment areas for HWMU1, HWMU2, and HWMU3 are inspected for cracks, deterioration, joints and seams in concrete surfaces, damage to containment berms, leaks, and spills. The containment pallets used to contain liquid hazardous wastes in HWMU3 are inspected for damage, The overall Facility is inspected during each normal business day. The Facility inspection includes security fences and general facility housekeeping.

Any damage or deterioration of containers or containment systems will be remedied as quickly as possible to ensure that the issue is not an environmental or human health hazard. Releases from containers will be addressed and cleaned-up immediately upon discovery. Leaking containers will be placed in over-packs or the waste materials will be placed in another container.

All releases are reported to the Facility Manager. Repairs and remedial work to correct emergency conditions which represent hazards to human health and the environment will be initiated within 24 hours of discovery and will be completed as expeditiously as possible. Repairs and remedial work to correct non-emergency issues will be initiated within 7 days and will be completed as expeditiously as possible. All issues and remedial work will be documented on the Inspection Log

and in Inspection Reports. When remedial work is completed, it will be so noted on the Inspection Log. A copy of the Daily Inspection Report form is presented in Appendix B.

3.1.2. Weekly Inspections

In addition to the daily inspections, Qualified Facility personnel will inspect safety and emergency response equipment on a weekly basis. These inspections ensure the emergency response equipment will function and ample emergency response supplies will be on hand when needed. This inspection includes an inventory of personal protective equipment (PPE), spill response supplies (such as over-pack drums and absorbent), fire suppression monitoring system (including gauges and valve seals), fire extinguishers, safety showers, eyewashes, first aid supplies, decontamination equipment and supplies, and other emergency response equipment such as pumps, hoses, and forklifts. Qualified Facility personnel to conduct weekly inspections includes the Facility Manager, Compliance Manager, Yard Manager, and Yard Supervisor. A copy of the inspection report form used for weekly and monthly inspections is presented in Appendix C.

3.1.3. Monthly Inspections

The security system is inspected on a monthly basis. This inspection includes the perimeter fencing and warning signage; the entrance gate and lighting; Facility lighting; the surveillance system and motion sensors; the communication system, and building doors and locks. These inspections include equipment functionality and checking calibration dates. If required, equipment is recalibrated as part of the inspection. A subcontractor will also be used to calibrate laboratory equipment if required. A copy of the inspection report form used for weekly and monthly inspections is presented in Appendix C.

3.1.4. Quarterly and Annual Inspections

Laboratory and fire suppression system equipment will be inspected on a quarterly basis by the Facility Manager or Compliance Manager. The quarterly inspection will include all monitoring and laboratory equipment as well as the fire suppression system. Laboratory test equipment will be checked for damage, and laboratory supplies checked to ensure an adequate supply of test and calibration materials are available on site. PID and gas detector instrumentation will be checked for damage and usability. All water flow alarm devices, supervisory signal devices, control valves, hydraulic nameplates, signage, hand-wheels, and fire department connections will be inspected. A copy of the Quarterly Inspection Report form is presented in Appendix D.

On an annual basis, a fire safety subcontractor will inspect sprinkler heads, pipes and fittings, spare sprinklers, control valves, the main drain, pressure test the backflow prevention valve, perform a partial trip test and internal inspection for all dry valves, test fire extinguishers, waterflow alarms,

and test the performance of the fire pump. Details of the annual inspection and testing of the fire suppression system will be documented in an annual report prepared by the fire safety contractor. Rural Metro will be notified in advance of any temporary shutdown of the fire suppression system during the annual inspection and testing.

3.1.5. Types of Problems and Inspection Frequency

The inspection schedule for items that may pose a hazard at the Facility is shown in the table below:

ITEM	TYPE OF PROBLEM	INSPECTION FREQUENCY
Safety and emergency response equipment and supplies (1)	Functionality of equipment. Inventory depletion of supplies.	Weekly
Monitoring and Laboratory Equipment (2)	Functionality and malfunction of equipment. Calibration. Inventory depletion of calibration supplies. Inventory depletion of laboratory supplies.	Quarterly
Fire suppression system and fire extinguishers	Gauges and seals on control valves. Inspect water flow alarm devices, supervisory signal devices, valve supervisory alarm devices, control valves, hydraulic nameplates, signage, hand-wheels, and fire department connections. Check testing dates of extinguishers. Pressure test the backflow prevention valve, sprinkler heads, pipes and fittings, spare sprinklers, control valves, the main drain, perform a partial trip test and internal inspection for all dry valves, test waterflow alarms, and performance test on the fire pump	Weekly Quarterly Annually
Security Equipment and Devices	Functionality and malfunction of surveillance equipment Integrity and breaches of perimeter fencing. Loss or damage to warning signs. Functionality of entry gate. Lighting.	Monthly
Containment (3)	Deterioration of or damage to sealants and joint compound. Cracks in concrete containment system. Damage to containment pallets. Presence of standing liquids or wastes outside of containers.	Daily

	Lighting. Run-on and run-off for HWMUs.	
Containers	Leakage Bulging Deterioration Improper or damaged labeling Improper stacking of containers. Open containers (except if adding or removing waste)	Daily

Notes: (1) See list of safety and emergency response equipment in Table 1.
(2) See list of monitoring equipment in Table 1.
(3) Containment includes the surfaces, curbs, and sumps in HWMU1, HWMU2, and HWMU3; individual container pallets; berms and other devices used to separate incompatible wastes.

3.2 Specific Process Inspection Requirements

Hazardous wastes will typically be transported to the Facility in tankers and/or containers (e.g. 55-gallon drums, totes) on flat-bed trucks, tractor trailers, or other vehicles. Hazardous wastes will be processed and stored in boxes, bags, drums, totes, or roll-offs. Consolidated wastes may be placed in roll-offs, end dumps, tanker trucks or mobile containers including drums, pails, or totes of various capacities. No stationary tanks, waste piles, surface impoundments, or containment buildings will be used for management of wastes accepted at the Facility. No treatment equipment, including incinerators, boilers, industrial furnaces, or other equipment will be used at the Facility. Further, the Facility will not have any landfills, drip pads or other areas where wastes would be treated and/or disposed.

The management areas at the Facility that will be inspected include HWMU1, HWMU2,and HWMU3. Structures, equipment, and containers at each management unit are regularly inspected for functionality, deterioration, failure, operator error or other issues that could represent hazards to human health and/or the environment.

3.3 Container Inspection

Potential issues associated with containers to be stored and processed at the Facility include the following:

- Damaged and deteriorated containers;
- Leaking or open containers;
- Spills and releases during loading, unloading, and transport within the Facility;
- Improper handling, stacking, or placement of containers; and

- Failure and/or deterioration of secondary containment system or structure.

The containers and the container storage areas are inspected daily as part of the day-to-day operations conducted at the Facility. The inspections are tracked on an inspection log and documented on inspection report forms. Should any issue be discovered during the inspection, the issue is noted on the inspection log and the inspection report. The issue remains as an open item on the inspection log until resolved with any repairs or remedial work completed. Repair and remedial work are documented on supplemental inspection reports. The Facility database is updated should any waste be removed from a damaged container and placed in another container or consolidated with other wastes in a larger container.

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4.0 PREPAREDNESS AND PREVENTION REQUIREMENTS

The Facility has developed a hazard prevention program to address unanticipated issues that may occur at the site. The program includes equipment, procedures, and arrangements with subcontractors and public emergency response agencies to address issues that may impact human health and the environment.

4.1 Equipment Requirements

The Facility maintains various types of equipment that may be used if an imminent danger or emergency condition exists. This equipment includes internal and external communication systems; fire suppression equipment; monitoring and testing equipment; equipment for spill control; small amounts of emergency medical supplies; and personal protection equipment (PPE).

4.1.1. Internal Communications

Internal communications will be via an alarm system for immediate notifications and a voice communication system for issuing instructions. The initial notification to on-site personnel will be by an alarm system, which monitors for fire and security. Alarm system panels are located at strategic locations so that the Facility Manager and/of the Emergency Coordinator (EC) can identify where and what triggered the alarm. The alarm system is electrically operated and is equipped with a battery back-up to ensure operation during power outage.

Manual alarm devices (pull stations) are located adjacent to the Facility exit and at entry and exit doors for the main building. The alarms will sound an audible warning signal to employees inside and outside the buildings. All employees are trained in the activation process for the manual alarms.

The alarm system is monitored by an outside third party. The third party will contact the Facility Manager, EC, or designated Emergency Contact during business hours for further direction. After business hours, the third party will first alert the local authorities of the alarm and then notify the Facility Manager and EC.

Internal telephone and radio systems allow communication throughout the Facility for use in notifying employees of a potential or existing emergency. This will be used in conjunction with the alarm system. Because of the relatively small size of the Facility, voice is "capable of providing immediate emergency instruction (voice or signal) to facility personnel" as required at 40 CFR §264.32(a). In addition to the alarm and internal telephone/radio system, the Facility has a public address system (PA) that can be used to notify employees of emergencies or provide instructions. All Facility personnel involved with hazardous waste operations are equipped with a radio that can

transmit and receive signals at all locations within the Facility. The Facility Manager and EC are equipped with cellular phones and can be reached at any time during operating hours. Total plant evacuation is initiated only by an emergency coordinator or the activation of the alarm system. Internal communications concerning all emergency conditions will follow the Contingency Plan in Attachment G.

4.1.2. External Communications

The Facility has land-line telephones and cellular phones issued to the Facility Manager and the EC for use in communicating to entities outside the Facility. These Facility telephones will be used to contact local and state agencies or other entities of emergency conditions. The telephones are located in the office and the laboratory areas within the main building. Emergency phone numbers are posted near the telephone at the exits of the main building.

4.1.3. Emergency Equipment

The Facility maintains various types of emergency equipment including equipment for spill control, small amounts of emergency medical supplies, and PPE, as listed in Table 1. Emergency equipment includes, but is not limited to, the following:

1. Portable fire extinguishers. At least one ABC Dry Chemical Type, minimum 10-pound capacity, ABC fire extinguishers is maintained adjacent to each HWMU. In addition to hand-held A/B/C fire extinguishers, the Facility has 9 fire extinguishers rated B/C for flammable liquid and electrical fires fire extinguishers located at each HWMU. Additional portable fire extinguishers have been placed at strategic locations throughout the Facility. Each is marked by red panels painted on the wall, column, post or other fixture where the fire extinguisher is located. Extinguishers are checked on a quarterly basis, with annual testing and maintenance performed by an outside contractor. The records are maintained in the Facility office by the EC or designee.
2. Spill response material. Spill kits are maintained and located at multiple locations throughout the Facility including but not limited to (1) the loading dock, 2) in the staging area (specially equipped for the material stored in these areas), and 3) the quarantine area in the main building. Additional spill response material is stored in each HWMU. The equipment is inventoried and maintained by the EC or designee.
3. Oil and chemical spill containment and control equipment is located in the main building container storage area and in various areas throughout the Facility. The containment and control equipment including booms and absorbent clay are also located in various locations throughout the Facility. Additional equipment is located in each HWMU. Additional spill response equipment is listed in the Contingency Plan in Attachment G.

4.1.4. Fire and Water Control

The Facility is designed with a 121,000-gallon water tank for exclusive use in fire suppression that was designed to provide a water supply of sufficient and pressure and volume as required by the Rural Metro Fire Department. A six-inch pressurized water line runs from the water tank to the northwest corner of the warehouse building, which services an internal sprinkler system for the warehouse. The main building is equipped with an automatic sprinkler system that was installed when the building was constructed. Fire line connections are provided on the six-inch line to service the HWMUs with fire suppression water. The fire suppression system is inspected quarterly by trained personnel and tested annually by an outside contractor. Fire suppression system testing records are maintained in the Facility office.

In addition to the fire suppression system and the main building sprinkler system, the Facility is protected by conventional ABC fire extinguishers located in the main building and at various other locations on the site. In addition to hand-held A/B/C fire extinguishers, the Facility has nine fire extinguishers rated B/C for flammable liquid and electrical fires. Facility personnel have been trained in fire response by the local fire department. Fire extinguisher locations are shown on Figure 2.

The Facility is a no-smoking facility except in designated area where signage indicates smoking is permitted. AA Sydcol requires a "Safe Work" permit for all welding or other "hot work" that may generate sparks or other sources of ignition. Safe Work permitted activities are only allowed in designated locations on the site and these areas are so marked.

4.1.5. Testing and Maintenance of Equipment

As part of the Facility inspection program, emergency response equipment will be inspected on a weekly basis. These inspections ensure the emergency response equipment will function and ample emergency response supplies will be on hand when needed. In addition to checking the inventory of emergency response supplies, this inspection includes a check of equipment functionality and of testing dates for fire extinguishers and the Facility fire suppression system. AA Sydcol has contracts with suppliers to provide annual inspections and testing of fire extinguishers and the Facility fire suppression system. Should the testing date be approaching, the Facility Manager will be notified to assure the supplier inspection takes place.

The security and alarm systems are inspected on a monthly basis. These inspections include the perimeter fencing and warning signs; the entrance gate and lighting; Facility lighting; the surveillance system and motion sensors; the fire alarm system, the communication system, and building doors and locks. These inspections will include testing of the functionality of item to assure they will work when needed.

All monitoring and laboratory equipment is inspected on a quarterly basis. These inspections include equipment functionality and checking calibration dates. If required, equipment is recalibrated as part of the inspection.

The Facility uses subcontractors to complete the inspections of the fire suppression system and fire extinguishers. A subcontractor will also be used to calibrate laboratory equipment if required.

4.1.6. Access to Communication or Alarm System

All Facility personnel involved with hazardous waste operations are equipped with a radio that can transmit and receive signals at all locations within the Facility. The Facility Manager and EC are equipment with cellular phones and can be reached at any time during operating hours.

Manual alarm devices (pull stations) are located adjacent to the Facility exit and at entry and exit doors for the main building. There are additional alarms located in strategic areas around the site, including at HWMU2 and HWMU3. All employees are trained in the activation process for the manual alarms.

4.2 Aisle Space Requirement

Containment pallets and waste containers are stored in double rows separated by aisles to access containers on either side of each aisle. Aisle widths between double rows of containers or containment pallets are at least 3 feet wider than the width of equipment accessing the aisle with a minimum width of 4 feet, to allowing for access by personnel, emergency equipment, and spill control equipment. All HWMUs have no obstructions around their perimeter, allowing for access for container inspections, fire protection, and spill control from all four sides of each management unit.

4.3 Documentation of Outside Response Arrangements

Arrangements have been made with outside entities to provide assistance in response efforts should an emergency be beyond the capabilities of on-site resources.

4.3.1. Police and Fire Departments

The Facility is located within the jurisdiction of the Yuma County, which will provide municipal services for the Facility and its vicinity. The applicable local authority for emergency response at the Facility is the Yuma County Rural Metro, which will respond from one of its stations in or near the City of Yuma. The Rural Metro Fire Department would generally respond to all fire, release, explosion, medical (paramedic), or other emergency events which require that outside

assistance be brought to the site. AA Sydcol has a subscription with Rural Metro Fire Department under Subscription No. SA36599511.

The Yuma County Sheriff's Department will provide additional municipal services, such as traffic and pedestrian control that may be required during an emergency event. A copy of a letter from AA Sydcol to the Yuma County Sheriff's department provides notification of activities to be conducted at the Facility is included in Appendix E.

4.3.2. Emergency Response Teams

No arrangements with other emergency response entities (such as State emergency response teams, emergency response contractors, or equipment suppliers) due to the size of the Facility and the nature of hazardous waste management activities conducted at the Facility. Such arrangements are not deemed necessary in addition to on-site and Yuma County Fire Department capabilities. However, that does not preclude the utilization of a private emergency response contractor, if judged to be necessary and appropriate for quick response and ability to effectively handle many different situations.

4.3.3. Local Hospitals

The Yuma Regional Medical Center at 2400 South Avenue A in has been contacted and familiarized with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases on site. If new activities change the types and/or severity of potential injuries, the EC will provide the hospital with additional information regarding the new activities.

Copies of the letter to Yuma Regional Medical Center providing notification of Facility activities are included in Appendix E.

4.3.4. Document Agreement Refusal

Sydcol has not received any refusal for arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes, or to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

5.0 PREVENTION PROCEDURES, STRUCTURES, AND EQUIPMENT

Waste shipments entering the Facility are typically directed to the receiving area on the south side of the main building where dock-high loading bays are located. Incoming non-bulk and bulk containers are unloaded from transport vehicles using forklifts or hand conveyance equipment and transported to the Check in Station. Forklifts or other conveyance equipment can drive directly into a truck to unload containers. Once the waste is classified and labeled, it is moved from the Check in Station to the appropriate area within HWMU1, HWMU2, or HWMU3 for storage, consolidation, or shipment offsite. Employees are trained in the proper techniques for moving containers to ensure that the containers are handled in a manner that would not cause the container to rupture or leak.

5.1 Unloading Procedures

Possible hazards in loading and unloading containers include puncturing containers; tipping containers during transfer; releases from equipment used to transfer from one container to another; and placing a container in an area with incompatible wastes.

Container unloading, consolidation, and loading activities are performed in designated areas. Typically, containers are moved between the check-in station and HWMU1, HWMU2, HWMU3 and HWMU4 via forklift, using pallets or drum grabbers, or using other methods, such as drum dollies, hand trucks, or by tilting and rolling. Containers may also occasionally be transported on trailers pulled by forklifts. All equipment used to move containers are specialized equipment designed for that use so containers are not damaged. All containers are labeled or marked with information on where they are to be stored and/or processed.

Containers that are found to be leaking when received at the Facility or at another stage of processing will be placed immediately in a drum over-pack or transferred into another container. Absorbent is used to collect any leaked material from the area of the release and containerized and incorporated into processing at the Facility.

Tanker truck loading is performed within HWMU2 and HWMU3. Waste materials are transferred to and from tanker trucks using quick-couple hoses, valves, and pumps. The pump may be on the tanker truck. All hose-to-hose and hose-to truck couplings are cam-lock couplings, which will be secured in portion using duct tape and/or another means to minimize the potential for decoupling during waste transfer activities. Drip pans will be positioned beneath each coupling to collect any liquid spills during attachment and detachment of the hoses. If a hose is found to be leaking during use, the pump will be shut off and the hose will be repaired or removed from service and replaced.

All loading and unloading activities will be supervised by Facility personnel. Spills will be contained with absorbent material and free liquids will be pumped into containers. All resulting materials from cleanup, including waste, waste absorbent, and PPE, will be incorporated into processing at the Facility and will be containerized and disposed with similar and compatible material generated at the Facility.

5.2 Runoff Prevention

The hazardous waste storage and processing activities at the Facility are conducted in otherwise contained areas. The Facility is located in a relatively flat area of Yuma County and has been graded to drain to low areas in the interior portions of the site. A perimeter berm contains stormwater runoff on site. All HWMUs are constructed above grade to prevent stormwater from running into the containment area. This will mitigate the run-off of hazardous waste from the Facility. An engineered system of retention basins is located along the perimeter of the site to retain stormwater runoff generated on-site. General drainage features for the site are shown in Figure 2.

The HWMU1, HWMU2, and HWMU3 storage areas are designed to provide secondary containment. Each of these HWMUs have been constructed above the surrounding grade to eliminate run-on from areas outside the units. Runoff from these units is prevented as they have sloped floors that drain to a low point on one side of each unit.

Stormwater that collects in the low point areas of HWMU1, HWMU2, and HWMU3 in sufficient quantity to be removed by pumping will be pumped from the containment sumps into totes for temporary holding pending waste characterization. Transfer of stormwater to totes will begin within 24 hours of precipitation accumulating in a given HWMU low point in quantities sufficient to pump into a container. Totes containing stormwater collected from HWMUs will be held within the containment area of the same HWMU and labelled “containment stormwater” and “waste characterization pending”.

Rainwater will be sampled for waste characterization within 10 days of accumulating quantities of rainwater sufficient to fill one or more totes in a given HWMU. A representative sample of the rainwater from each HWMU will be collected consistent with the sampling methods described in the WAP and analyzed for eight RCRA metals by EPA Method 6010C, standard VOCs by EPA Method 8260B, standard SVOCs by EPA method 8270C, and organo-chlorine pesticides by EPA Method 8081B using an Arizona-certified environmental laboratory following internal QA/QC protocols consistent with their certification. Analytical results will be compared to toxicity characteristics listed in 40 CFR 261.24 and contained-in thresholds established by permit as the

universal treatment standards for wastewater promulgated in the EPA's land disposal restrictions in 40 CFR 268.48.

Rainwater that exhibits a toxicity characteristic or exceeds a presumptive contained-in concentration will be profiled for disposal as a hazardous waste. Rainwater with concentrations of constituents in excess of presumptive contained-in thresholds will be presumed to be a listed hazardous waste and profiled for disposal. Rainwater that contains concentrations of compounds below toxicity characteristic levels and below presumptive contained-in thresholds will be profiled for disposal as a non-hazardous solid waste. Additional compound-specific contained-in thresholds may be submitted to ADEQ for consideration as a contained-in quantity on a case-by-case basis. Sydcol may apply for an Aquifer Protection Permit from ADEQ to utilize clean stormwater for dust control or other applications at the Facility.

Depending on the analytical test results, stormwater could be used for dust control or pumped to unpaved areas on the site for evaporation (uncontaminated stormwater) or be pumped into containers and processed with other waste materials at the Facility as either hazardous or non-hazardous liquid waste.

Rainwater will be removed from any containment area containing RCRA waste in as timely a manner as necessary to prevent overflow of the containment area. If any RCRA waste is present, accumulated precipitation in the tank farm will be removed within 24 hours after results of the testing are available.

5.3 Protection of Water Supplies

The primary protection of water supplies is the storage of all liquid hazardous wastes within secondary containment so as to provide a physical barrier between liquid hazardous wastes and the public water supply. Hazardous wastes are staged, stored, and processed in management units that are constructed with concrete floors. HWMU1, HWMU2, and HWMU3 have containment curbs on three sides with sloped floor surfaces to low area along one of the curbed sides. HWMU1 and HWMU2 are constructed with a 60-mil HDPE geomembrane liner underlying the concrete pad with the liner extended up the sidewalls of the pad. HWMUs have chemicals resistant sealant and joint compounds applied to the concrete surfaces to prevent migration of wastes through the concrete. During daily inspection of these areas, spills or leaks of liquid wastes will be identified quickly and will be immediately cleaned up to prevent migration of wastes into the concrete or underlying soils. By preventing the migration of hazardous waste constituents into site soils, the possibility of impacting a water supply is negligible.

In the unlikely event that wastes from a spill in one of the management units migrates beyond the concrete containment curbs, procedures followed at the Facility are designed to minimize the

impact of such an incident. Containers and containment areas are inspected daily so such a release could be addressed quickly to control the extent of the release. Facility personnel will immediately contain such a release and begin efforts to containerize any free liquids as soon as practical. Following removal of the waste material, remedial activities will begin in accordance with the procedures outline in the Contingency Plan in Attachment G. A Watts Series LF009 1.5-inch reduced pressure zone assembly backflow prevention valve has been installed on the water service line connecting the Facility to public water supplies upstream of all HWMUs.

5.4 Equipment and Power Failure

A power failure will not significantly affect waste processing activities at the Facility. Equipment used to load, unload, and transport containers within the Facility are either fueled by propane gas (such as the forklifts) or are manually operated. Should a power failure occur, waste processing activities will be limited to those which can be conducted using non-electrical equipment.

A power failure will impact consolidation activities at the Facility. Should a power failure occur during pumping activities using an electrically driven pump, the pump power switch will be placed in the off position and the appropriate valves will be closed to contain waste materials in the transfer hoses until power is available. Since air driven pumps are generally operated with an electrical air compressor, they will not operate during a power failure. Some tanker trucks are equipped with pumps that are self-powered and these will not be affected by a power failure at the Facility.

If pump failure occurs during waste transfer, the pump power switch will be moved to the off position and valves at both ends of the transfer hose will be turned to the closed position. If there are bleed valves in the pump, they will be used to drain the content of the pump into the container being pumped into. These containers will be marked with a new number generated by the Facility database for tracking. The pump will be decontaminated and then sent out for repairs. Should a replacement pump be available, it will be placed in position with the containers and hoses, valves will be opened, and pumping operations will resume. If a replacement pump is not immediately available, the hoses will be drained into containers and decontaminated. The containers will be re-labeled as necessary for tracking.

The alarm system at the Facility contains a battery back-up power source. The battery charge is monitored within the alarm system and displays a warning when battery charge is low. The security and alarm system inspection is conducted on a monthly basis and will be sufficient to identify deficient battery charge before batter power is fully drained. The Facilities fire suppression system has a backup power supply. A contractor performs an inspection of the alarm system annually and this includes checking the status of the backup battery source.

5.5 Personal Protection Procedures

The Facility has implemented a personnel protection program to prevent undue exposure of personnel to hazardous waste using engineering controls and administrative measures. Engineering controls include the use of PPE; requiring the use of DOT approved containers; use of specialized drum handling equipment; and providing safety showers and eyewash units at strategic locations throughout the Facility. Administrative measures include training for hazardous waste operators and restrictions on Facility access.

PPE is to be used during all waste processing activities conducted at the Facility, including drum sampling, loading/unloading, spill cleanup, or waste transfer. PPE is to include safety glasses with side shields or face shields, hard hats, steel-toed boots; individual respiratory protection devices and appropriate cartridges; chemically resistant gloves; and coveralls and/or aprons. Additional PPE maintained at the Facility includes supplied air respirators and full body protective suits that are acid and solvent resistant.

All visitors must sign in at the main building office and wear a hard hat and safety glasses and be accompanied by a Facility employee if entering the yard or any management unit.

5.6 Procedures to Minimize Releases to the Atmosphere

Waste processing activities are conducted at the Facility in a manner that minimizes releases to the atmosphere. The primary pollutants are particulate emissions and vapor emissions. Particulate emissions are generated during vehicular travel on unpaved areas of the site and from consolidation of solid non-liquid wastes. Engineering controls used to minimize these emissions include limited vehicular traffic to posted speeds of 15 mph or less, periodic application of moisture or dust control applications to unpaved surfaces, and controlling the rate at which solid waste materials are transferred from one container to another. A six-inch layer of gravel has been placed at the Facility entrance to minimize trackout from outgoing traffic. Bulking of solid materials into rolloff bins is not performed when wind conditions are such that the bulking transfer cannot be completed without debris being windblown from the transfer.

Vapor emissions are limited by keeping all containers closed when not in use. Liquid wastes are typically transferred by pumping the waste from one container to another. While liquid is removed from the container, air will flow into it replacing the liquid volume, which will minimize the vapor emissions. Tanker trucks used for consolidation of liquid waste also have vents that are equipped with back pressure devices to prevent emissions.

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6.0 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE WASTE

AA Sydcol uses a combination of engineering controls and administration procedures at the Facility to classify and properly isolate ignitable and reactive wastes during storage and processing.

6.1 General Precautions of Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste

All waste accepted at the Facility is classified at the Check-in Station prior to processing in accordance with procedures described in the Waste Analysis Plan is Attachment C. The classification process identifies wastes that are reactive, what are the reactants, and what other wastes they may be compatible with. Following classification, the wastes are transferred to an isolation area with similar and compatible waste. During consolidation, reactive wastes are carefully monitored to assure they are not mixed with an incompatible material. Facility procedures to isolate reactive wastes in specified storage areas and limit consolidation activities to materials within the isolation area will minimize hazards in processing reactive materials.

6.2 Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes

The primary source of ignition to waste materials in containers stored and processed at the Facility are external to the container. All HWMUs are located greater than 50 feet from the perimeter fence, providing a buffer zone from ignition source outside the Facility. The Facility is a no-smoking facility except in designated area where signage indicates smoking is permitted. AA Sydcol requires a "Safe Work" permit for all welding or other "hot work" that may generate sparks or other sources of ignition. Safe Work permitted activities are only allowed in designated locations on the site and these areas are so marked.

Only Hazardous Waste Technicians trained in hazardous waste operations are allowed to handle waste on site, including ignitable and reactive waste. Wastes on site are sampled and tested pursuant to the WAP contained in the Facility's RCRA Permit application, Attachment C. As described in the WAP, waste is not handled until an appropriate compatibility evaluation has been conducted. That evaluation varies depending on waste type, and where and how the waste is to be handled.

Hazardous waste stored and processed at the Facility is at ambient temperature. Waste materials that are thermally unstable at the ambient temperatures experienced at the Facility are not acceptable and will be rejected during the profiling process. All containers used at the Facility are waterproof so they can be placed in HWMU1, HWMU2, or HWMU3

Equipment used to transfer ignitable or reactive wastes from one container to another are spark and explosion proof. The transfer lines, including containers, pumps, hoses and valves, will be grounded to prevent static sparks when in use. Proper grounding for the transfer line will be provided by using a grounding wire with spring clamps to a grounding bus or copper grounding rod driven a minimum of 8 feet into the ground. When pumping liquids to/from a container from/to a tanker, the tanker and container will be bonded to prevent a static charge from being developed.

6.3 Documentation of Adequacy of Procedures

Equipment and operating practices will follow NFPA standards for the transfer of ignitable wastes, including NFPA 69 *Standard on Explosion Prevention Systems*, NFPA 430 *Code for the Storage of Liquid and Solid Oxidizers*, NFPA 484 *Standard for Combustible Metals*, NFPA 654 *Standard for the Prevention of Fire and Dust Explosions from the Manufacturing, Processing, and Handling of Particulate Solids*, and NFPA 30 *Flammable and Combustible Liquids Code*. The Training Manager will be responsible for incorporating relevant materials in these standards in personnel training for methods of materials consolidation and bulking techniques. A copy of these standards will be maintained at the Facility in the administrative office area.

6.4 Management of Ignitable or Reactive Wastes in Containers

All hazardous waste containers are stored and processed within the four management units, HWMU1, HWMU2, or HWMU3. Each of these units are located at least 50 feet from perimeter fencing around the Facility. Containers are never stacked taller than the equivalent of two 330-gallon totes; with smaller containers always placed on larger containers. The only ignition sources with the management units are electrical outlets in HWMU1. All electrical outlets in HWMU1 have explosion-proof receptacles.

Container handling procedures used at the Facility and documented in the Container Management Plan include precautions to prevent accidental fire or explosion of ignitable or reactive hazardous wastes. These procedures dictate proper container labeling, stacking, and sealing; storage isolation using dikes or other barriers; placement of warning signs; and an inspection schedule.

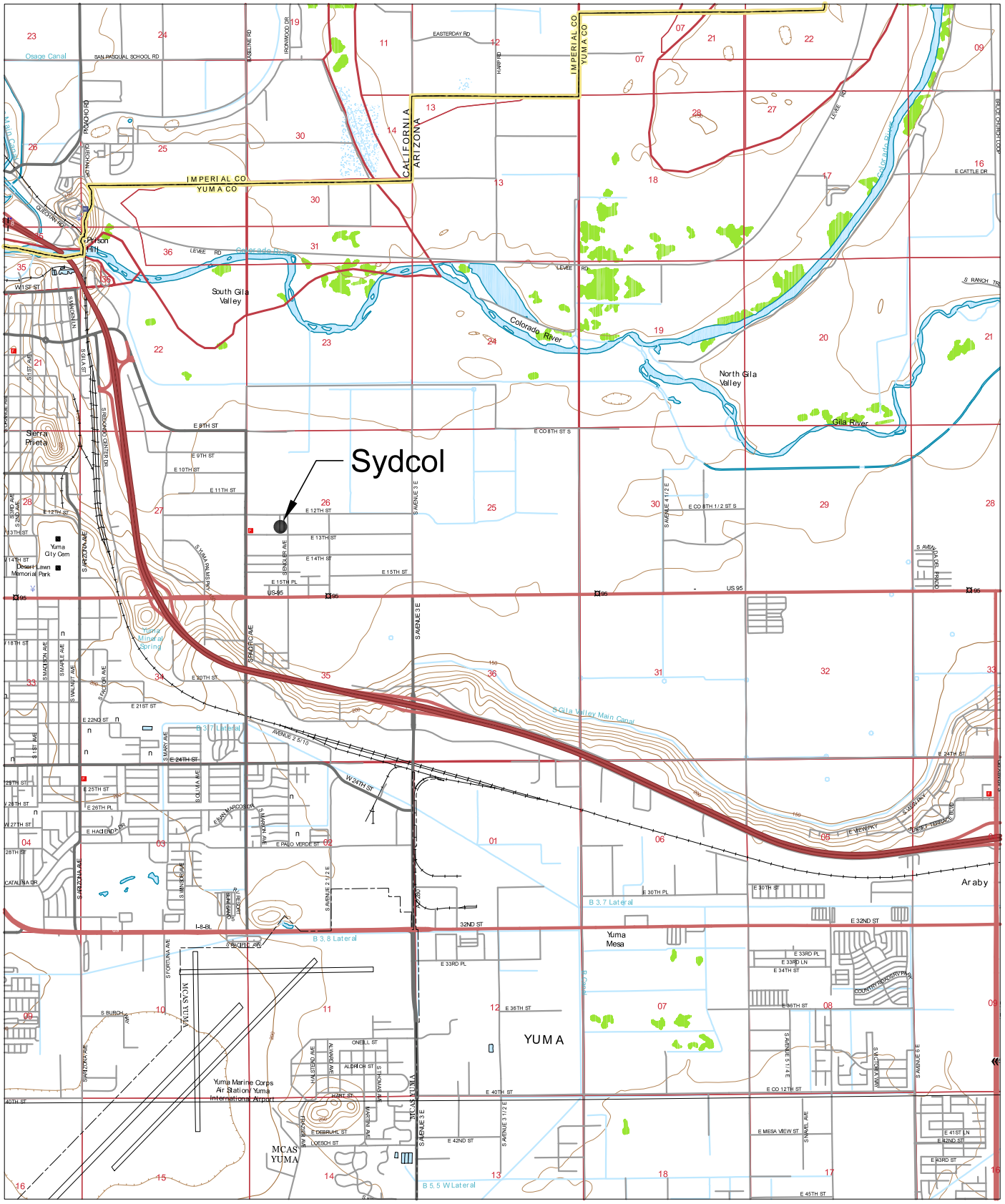
Containers with incompatible wastes are stored and processed in separate and isolated areas within the management units consistent with the Container Management Plan. Berms, walls, containment pallets, or other appropriate means are used to isolate incompatible wastes. Since lab packs provide secondary containment, lab packs with incompatible wastes may be isolated by aisle space separation.

TABLE

Table 1
List of Safety, Emergency, and Monitoring Equipment

Item/Description	Capability	Number	Storage Area
Rubber Gloves	Hand Protection	20	Warehouse, office area
Ear Plugs	Hearing Protection	100	Warehouse, office area
Safety Glasses & Shields	Eye Protection	10	Office area
Hard Hats	Head Protection	12	Office area
Respirators	Respiratory Protection	10	Office area
Disposable Tyveks (coveralls)	Skin Protection	10	Office area
Safety Shoes	Foot Protection	4	Office area
Fire Extinguishers	Fire Protection	9	All HWMUs, office area
Medical Supplies	Injured Personnel	1	Office area
Shovels	Contaminated Material Movement	5	Warehouse, office area
Absorbent Brooms (10’ x 8”)	Floating Contaminant Absorption	5	All HWMUs, office area
Absorbent Pillows (18” x 8”)	Floating Contaminant Absorption	5	All HWMUs, office area
Absorbent Pads (3/8 x17”x\19”)	Floating Contaminant Absorption	5	All HWMUs, office area
Absorbent Rolls (144’ x 38”)	Floating Contaminant Absorption	5	All HWMUs, office area
Oil-Dry Absorbent (~6,000 lbs.)	Contaminant absorption	5	All HWMUs, office area
Two-Way Radio Base Station	Communication	1	Office area
Two-Way Radios	Communication	8	All HWMUs, office area
Telephone System	Communication	1	Warehouse, office area
Portable pumps	Consolidation	4	Warehouse, office area
Hoses and Valves	Consolidation	4	Warehouse, office area
Decon Kits	Decontamination	2	Warehouse, office area
Hand Scoops	Clean up/Consolidation	10	All HWMUs, office area
Photoionization Detector	Monitoring	1	Office area
Multi Gas Meter (O2 and LEL)	Monitoring	1	Office area
Compatibility Bucket	Waste Analysis	1	Office area
Glass Sampling Tubes	Waste Analysis	20	Office area
Windsock	Wind direction, relative strength	1	East property boundary

FIGURES


Sydcol
IMPERIAL CO
YUMA CO
CALIFORNIA
ARIZONA
Colorado River
Gila River
South Gila Valley
North Gila Valley
Sierra Prieta
Yuma City Cem
Desert Lawn Memorial Park
Yuma Mineral Spring
S Gila Valley Main Canal
B 3.7 Lateral
B 3.8 Lateral
B 5.5 W Lateral
Yuma Mesa
YUMA
Araby
Yuma Marine Corps Air Station/Yuma International Airport
MCAS YUMA
US 95
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S MCKEEN AVE
S MAPLE AVE
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S PACIFIC AVE
S SENDER AVE
S MCLEAN AVE
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S MCTOWNSEND TER
S MCTOWNSEND RD
S MCTOWNSEND PKWY
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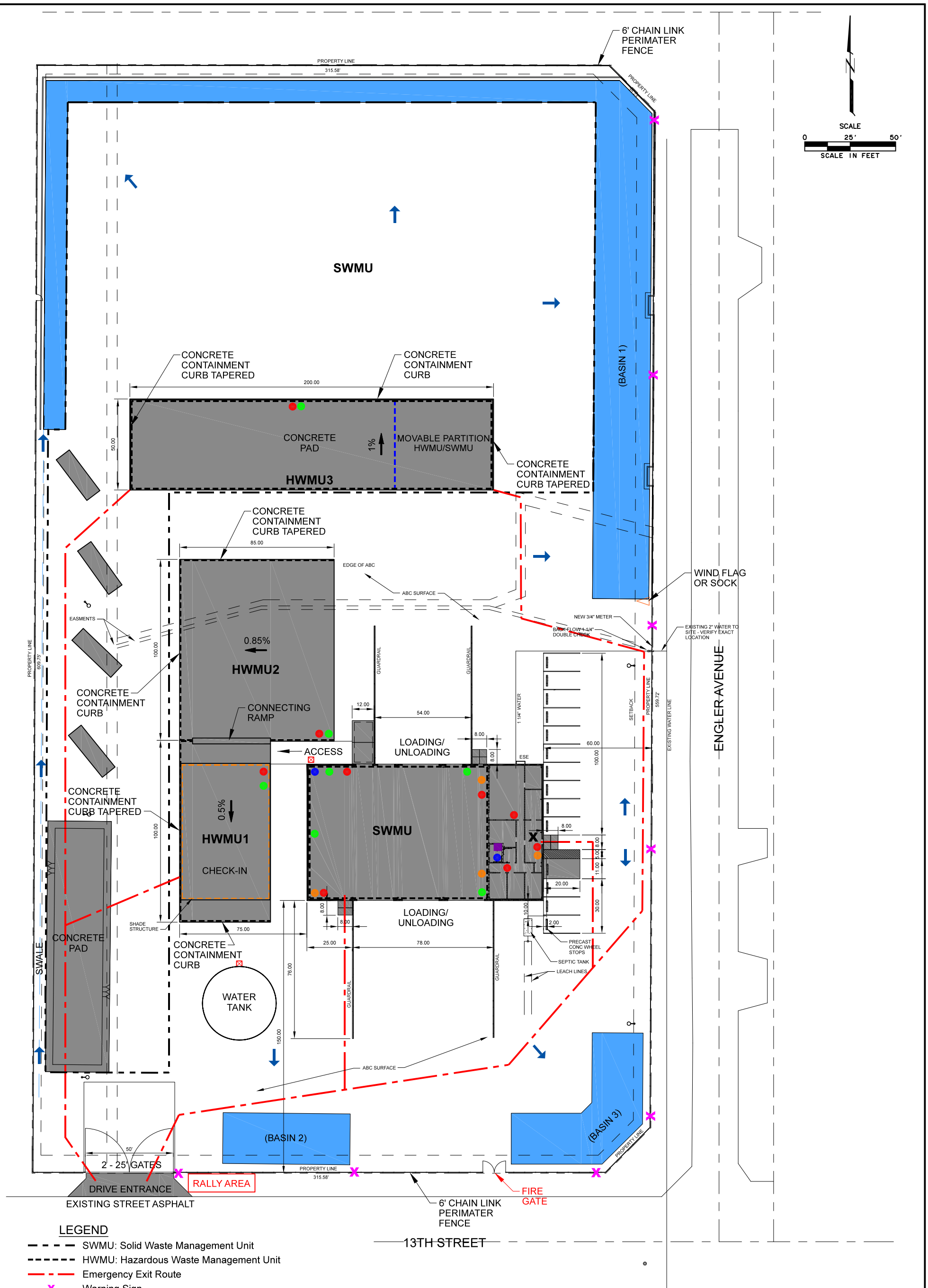

LEGEND

- SWMU: Solid Waste Management Unit
- HWMU: Hazardous Waste Management Unit
- Emergency Exit Route
- Warning Sign
- Spill Kit
- Fire Alarm
- Fire Extinguisher (ABC)
- Eyewash
- Shower
- Facility Report
- Fire Hose Connection
- Concrete Surface
- Drainage Direction
- Drainage Basin

Figure 2
SITE PLAN
Sydcol
2264 E. 13th St.,Yuma, AZ 85365

CLIENT:	APPROVED BY: JGP
PROJECT:	PROJECT NO:
DESIGNED BY: JGP	DATE: 11/5/21
DRAWN BY: TML	DWG/FILE: SYDCOL02
REVISION:	

JGP Consulting, PLC
Environmental Compliance Services

Appendix A.

Inspection Log

AA SYDCOL, LLC.
INSPECTION LOG

DATE	TIME	INSPECTOR NAME	INSPECTOR INITIALS	INSPECTION TYPE	ISSUE IDENTIFIED (use one line per issue)	DATE ISSUE RESOLVED

Appendix B

Daily Inspection Report

AA Sydcol, LLC
Daily Inspection Report

INSPECTOR NAME: _____ DATE OF INSPECTION _____

TIME OF INSPECTION _____

ITEMS INSPECTED:

HWMU1	Containers	☐	Containment Pallets	☐ Surface Sealant	☐
	Labels	☐	Containment Structures	☐ Spills/Leaks	☐
			Aisle Space	☐	
HWMU2	Containers	☐	Containment berms	☐ Surface Sealant	☐
	Labels	☐	Aisle Space	☐ Spills/Leaks	☐
HWMU3	Containers	☐	Containment berms	☐ Surface Sealant	☐
	Labels	☐	Aisle Space	☐ Spills/Leaks	☐

ISSUES IDENTIFIED

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REPAIRS AND/OR REMEDIAL WORK PERFORMED

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FINAL REPAIR/RESOLUTION OF OUTSTANDING ISSUE

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INSPECTOR SIGNATURE _____

Appendix C

Weekly/Monthly Inspection Report

AA Sydcol, LLC
Weekly/Monthly Inspection Report

INSPECTION TYPE: □ Weekly □ Monthly DATE OF INSPECTION _____

INSPECTOR NAME: _____ TIME OF INSPECTION _____

ITEMS INSPECTED WEEKLY:

EQUIPMENT	PPE	☐	Fire Extinguishers	☐	Eye Wash	☐
	Pumps	☐	Hoses	☐	Forklifts	☐
	Monitoring Equipment	☐	Decon Equipment	☐	Overpacks	☐
	Lab Equipment	☐				
SUPPLIES	Respirator Cartridges	☐	Gloves	☐	Tyvek Suits	☐
	Containment Supplies	☐	First Aid Supplies	☐	Decon Supplies	☐
	Lab Supplies	☐	Spill Response Kits	☐		
COMMUNICATIONS	Radios	☐	Telephoned	☐		
FIRE SUPPRESSION	Gauges/seals	☐	Extinguishers	☐		

ITEMS INSPECTED MONTHLY:

SECURITY	Fencing	☐	Warning Signs	☐	Yard Lighting	☐
	Entry Gate	☐	Gate Lighting	☐	Gate Camera	☐
	Surveillance System	☐	Motion Sensors	☐		
	Radios	☐				

ISSUES IDENTIFIED

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REPAIRS AND/OR REMEDIAL WORK PERFORMED

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_____

FINAL REPAIR/RESOLUTION OF OUTSTANDING ISSUE

_____
_____
_____
_____
_____

INSPECTOR SIGNATURE _____

Appendix D

Quarterly Inspection Report

AA Sydcol, LLC
Quarterly Inspection Report

INSPECTOR NAME: _____ DATE OF INSPECTION _____

TIME OF INSPECTION _____

ITEMS INSPECTED:			**COMMENTS:**
EQUIPMENT	PID Monitor	☐	
	FID Monitor	☐	
	Lab Equipment	☐	
	Lab Supplies	☐	
FIRE SUPPRESSION	Water flow alarms	☐	
	Supervisory signals	☐	
	Control valves	☐	
	Hydraulic nameplates	☐	
	Signage	☐	
	Hand wheels	☐	
	Fire Dept. connections	☐	

ISSUES IDENTIFIED

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REPAIRS AND/OR REMEDIAL WORK PERFORMED

_____

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_____

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_____

FINAL REPAIR/RESOLUTION OF OUTSTANDING ISSUE

_____

_____

_____

_____

_____

INSPECTOR SIGNATURE: _____

Appendix E

Notice to Authorities

AA Sydcol, LLC
Site: 2264 E. 13th Street, Yuma, Az 85365 • Mailing: 3155 Golden Willow Ct., Yorba Linda, Ca 92886
Phone: 928-783-3676 • Fax: 928-783-1766
www.sydcol.com

November 12, 2019

Yuma County Sheriff Department
141 S. 3rd Avenue
Yuma, AZ 85364

Subject: Hazardous waste facility operations

To Whom it May Concern:

AA Sydcol, LLC is in the process of preparing a permit application to operate a hazardous waste facility located at 2264 E. 13th Street on heavy industrial-zoned property in unincorporated Yuma County, Arizona. The operation will be managed consistent with Federal and State regulations for hazardous waste facilities and subject to permit requirements issued by the Arizona Department of Environmental Quality. It is estimated that the facility will handle 2,300 tons of hazardous waste each month, primarily wastes that are hazardous due to toxic characteristics but also corrosive, flammable, and reactive hazardous wastes. Operations at the facility will include receipt of containers of hazardous waste and consolidation of hazardous wastes for transport off-site for disposal at approved hazardous waste disposal facilities. We will not be receiving or managing radioactive wastes, biohazardous medical wastes, Class 1 explosives, and industry-specific hazardous wastes.

Attached is a site location map and site plan that illustrate the location where hazardous waste management operations will occur. We would like to make arrangements to meet with your representatives and review the layout of the facility, the properties of hazardous waste handled and the associated hazards, places where facility personnel will normally be working, access for entrance to and within the facility, and possible evacuation routes. We would also like to discuss any agreements that are necessary for emergency services from your organization.

Please contact me at your earliest convenience to make arrangements to review our operations with your staff.

Sincerely,

Charles M. Templer
Managing Member

AA Sydcol, LLC
Site: 2264 E. 13th Street, Yuma, Az 85365 • Mailing: 3155 Golden Willow Ct., Yorba Linda, Ca 92886
Phone: 928-783-3676 • Fax: 928-783-1766
www.sydcol.com

November 12, 2019

Rural Metro Fire Department
2029 S. Arizona Avenue
Yuma, AZ 85364

Subject: Hazardous waste facility operations

To Whom it May Concern:

AA Sydcol, LLC is in the process of preparing a permit application to operate a hazardous waste facility located at 2264 E. 13th Street on heavy industrial-zoned property in unincorporated Yuma County, Arizona. The operation will be managed consistent with Federal and State regulations for hazardous waste facilities and subject to permit requirements issued by the Arizona Department of Environmental Quality. It is estimated that the facility will handle 2,300 tons of hazardous waste each month, primarily wastes that are hazardous due to toxic characteristics but also corrosive, flammable, and reactive hazardous wastes. Operations at the facility will include receipt of containers of hazardous waste and consolidation of hazardous wastes for transport off-site for disposal at approved hazardous waste disposal facilities. We will not be receiving or managing radioactive wastes, biohazardous medical wastes, Class 1 explosives, and industry-specific hazardous wastes.

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Please contact me at your earliest convenience to make arrangements to review our operations with your staff.

Sincerely,

Charles M. Templer
Managing Member

AA Sydcol, LLC
Site: 2264 E. 13th Street, Yuma, Az 85365 • Mailing: 3155 Golden Willow Ct., Yorba Linda, Ca 92886
Phone: 928-783-3676 • Fax: 928-783-1766
www.sydcol.com

November 12, 2019

Yuma Regional Medical
2400 S. Avenue A
Yuma, AZ 85364

Subject: Hazardous waste facility operations

To Whom it May Concern:

AA Sydcol, LLC is in the process of preparing a permit application to operate a hazardous waste facility located at 2264 E. 13th Street on heavy industrial-zoned property in unincorporated Yuma County, Arizona. The operation will be managed consistent with Federal and State regulations for hazardous waste facilities and subject to permit requirements issued by the Arizona Department of Environmental Quality. It is estimated that the facility will handle 2,300 tons of hazardous waste each month, primarily wastes that are hazardous due to toxic characteristics but also corrosive, flammable, and reactive hazardous wastes. Operations at the facility will include receipt of containers of hazardous waste and consolidation of hazardous wastes for transport off-site for disposal at approved hazardous waste disposal facilities. We will not be receiving or managing radioactive wastes, biohazardous medical wastes, Class 1 explosives, and industry-specific hazardous wastes.

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Please contact me at your earliest convenience to make arrangements to review our operations with your staff.

Sincerely,

Charles M. Templer
Managing Member