ATTACHMENT A

AA SYDCOL, LLC

GENERAL INFORMATION
[40 CFR 270.13]

MARCH 15, 2021

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1 INTRODUCTION

This Operating Permit application for the Facility has been prepared to satisfy RCRA permitting requirements to operate a hazardous waste storage and transfer as defined in RCRA, 40 CFR 264.10. The application consists of two components as defined in 40 CFR 270; Part A, the EPA's RCRA Subtitle C Site Identification Form, and Part B, Facility information requirements identified in 40 CFR 270.14 through 270.28 and described in detail in the ADEQ's RCRA Completeness/Technical Evaluation Checklist (December 1997).

A list of acronyms and definition of terms used throughout Part B of the application is provided in Appendix A.

This section provides general information under Part B of the application.

2 DESCRIPTION OF ACTIVITIES REQUIRING PERMITTING

The Facility will accept a variety of hazardous and non-hazardous wastes, and consolidate, bulk, repackage, and store the wastes for shipment to approved off-site reuse, treatment, and/or disposal facilities, fuel blenders or wastewater treatment plants. These activities are subject to regulation under RCRA, 40 CFR parts 239 through 282 and require a hazardous waste permit. The RCRA hazardous waste management program is administered in Arizona by the ADEQ under delegation from the EPA. Specific parts of RCRA applicable to the activities to be conducted at the Facility include the following:

- Part 243 Guidelines for the Storage and Collection of Residential, Commercial, and Institutional Solid Waste
- Part 260 Hazardous Waste Management System: General
- Part 261 Identification and Listing of Hazardous Waste
- Part 262 Standards Applicable to Generators of Hazardous Waste
- Part 263 Standards Applicable to Transporters of Hazardous Waste
- Part 264 Standards for Owners and Operators of Hazardous Waste Treatment, Storage, And Disposal Facilities
- Part 265 Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, And Disposal Facilities
- Part 268 Land Disposal Restrictions
- Part 273 Standards for Universal Waste Management
- Part 279 Standards for the Management of Used Oil

Typically, wastes will be transported to the Facility in tankers and/or containers (e.g. 55-gallon drums, totes) and will be liquid, semisolid, and/or solid in nature. Wastes will be received directly from generators or through third-party waste brokers under contract with

hazardous and non-hazardous waste generators.

3 FACILITY CONTACT INFORMATION

Facility contact information is as follows:

Facility Address:	AA Sydcol, LLC 2264 East 13th Street Yuma, Arizona 85365
General On-Site Telephone:	(928) 783-3676
Primary Contact	Charles M. Templer Office Phone: (928) 783-3676
Alternate Contact	Juvi Remitio Mobile Phone: (928) 210-7077

4 SIC CODES

The Facility is a commercial solid and hazardous waste transfer facility. The Standard Industrial Classification (SIC) codes that best define the activities to be conducted at the Facility are:

SIC CODE	DESCRIPTION
4213	Trucking, Except Local
5093	Scrap and Waste Materials
7389	Business Services, not elsewhere classified

The NAICS codes that best define the activities to be conducted that the Facility are:

NAICS CODE	DESCRIPTION
562112	Hazardous Waste Collection
484230	Specialized Freight Trucking, Long Distance

5 OWNER/OPERATOR CONTACT INFORMATION

Owner/Operator contact information is as follows:

Owner:	Syd-Cole Properties, L.L.C. 2264 East 13th Street Yuma, Arizona 85365
Primary Contact	Charles M. Templer

	Office Phone: (928) 783-3676
Operator:	AA Sydcol, L.L.C. 2264 East 13th Street Yuma, Arizona 85365
Primary Contact	Charles M. Templer Mobile Phone: (928) 783-3676
Alternate Contact	Juvi Remitio Mobile Phone: (928) 210-7077

6 FACILITY STATUS

Sydcol currently uses the Facility as a solid waste transfer station involved in storing, consolidating, and repackaging non-hazardous wastes and shipping them off site to reuse, treatment, and/or disposal facilities. Current operations are conducted consistent with notice provided to the ADEQ. Sydcol plans to use a portion of the Facility as a transfer station for hazardous wastes. This application is the first application for acceptance of hazardous waste at the Facility.

7 PROCESS DESCRIPTION

The Facility will receive a variety of hazardous and non-hazardous wastes from commercial waste generators, industrial waste generators, LQGs, SQGs. and VSQGs of hazardous waste. The wastes will be profiled, classified, stored, consolidated and/or repackaged and shipped to approved off-site facilities for reuse, treatment, and/or disposal.

Generators or third-party waste brokers wishing to transport hazardous waste to the Facility must complete a pre-acceptance waste profile procedure prior to shipping wastes to the Facility. Waste profile information to be submitted will include generator information; waste stream information; waste properties; waste classification; waste description; transportation information; land disposal restriction notifications; and generator certification statements. The Facility will review the waste profile information and use generator knowledge and data on the physical and chemical properties of the waste to determine if the wastes can be accepted, if additional information is required, or if the waste cannot be accepted. If the waste is accepted based on the initial profile information or supplemental information, a waste profile number will be assigned. The Facility will use the procedures described in the WAP presented in Attachment C to characterize waste to be accepted at the Facility.

Wastes will typically be transported in tankers and/or containers (e.g. 55-gallon drums, totes)

and will be liquid, semisolid, and/or solid in nature. Acceptable wastes include characteristic wastes (D wastes), listed wastes (F, P, and U wastes), flammable and combustible materials (such as used oil, waste fuels, etc.), contaminated soil, universal wastes (such as batteries, mercury-containing equipment, mercury-containing lamps/bulbs, and certain pesticides), metal-containing filter cake, and other wastes listed in the WAP.

Typically, wastes are transported to the Facility via a tanker truck, flat-bed truck, or other vehicle. Trucks are directed to the loading docks for off-loading and transferred directly to the check-in area for receiving. Waste shipments arriving at the Facility will undergo a Level I Analysis to verify the waste shipment conforms to the description on the waste profile form and the manifest that accompanies the shipment. The Level I analysis includes a load inspection to confirm the shipment matches that described on the manifest and identify irregularities (such as damaged containers). The load inspection is also used to aid in properly segregating the wastes. A representative sample of 10 percent of the waste received will be obtained (when possible, safe, and reasonable) and analyzed for select parameters depending on the waste profile. Analyses can include pH, sulfide screen, cyanide screen, PCB screen, and oxidizer screen. If the results of the Level I Analysis fail, a Level II Analysis will be initiated. A Level II Analysis can include obtaining additional information from the generator addressing the Level I Analysis failures and/or additional sampling and testing. Acceptance procedures for incoming waste shipments at the Facility will follow those described in the WAP in Attachment C.

The Facility is situated on 4.75 acres of developed property. Site developments include a main building and two concrete pads that are used for management of incoming wastes.

The warehouse in the main building will only be used for off-loading trucks. A concrete pad adjacent and west of the main building is designated HWMU1, and a second concrete pad to be constructed northwest of the main building is designated HWMU2. A larger concrete pad is located north of the main building and is designated HWMU3. HWMU1, HWMU2, and HWMU3 are constructed with containment curbs and are sloped to drain to one side where spills or other releases will collect for removal. Once the hazard characteristics of a waste are identified, the waste material will be transferred to the appropriate area in HWMUs for ignitable, corrosive, toxic, and reactive wastes. These areas are separated by adequate aisle space, berms, catch basins, or other physical barriers that prevent a reaction caused by mixing potentially incompatible wastes. Ignitable or reactive RCRA hazardous waste are separated and protected from sources of ignition or reaction. Smoking at the facility is limited to specially designated areas and "No Smoking" signs are conspicuously placed throughout the Facility including, but not limited to entrances. Ignitable or reactive wastes in containers are stored at least 50 feet from the property line.

The Facility performs bulk consolidation of like wastes from smaller to large containers. These consolidation activities are conducted within the containment areas of HWMU1, HWMU2, and HWMU3. Liquid wastes are typically pumped from drums or totes to tankers. Solid and sludge wastes are consolidated into various sized containers. The Facility will record the waste manifest numbers for wastes consolidated into each container so waste characteristics can be tracked. Additional testing for characterizing the consolidated waste will be conducted if required by the receiving facility. Consolidated wastes are transported to approved facilities for reuse, treatment, and disposal.

8 SPECIFICATION OF HAZARDOUS WASTES

An estimate of annual hazardous waste quantities stored and processed at the Facility is provided in Table 1.

8.1 Acceptable Wastes

The waste streams accepted at the Facility will generally include characteristic wastes (D wastes) and/or listed wastes (F, P, and U waste), used oil, and universal waste (such as batteries, mercury-containing equipment, mercury-containing lamps/bulbs, and certain pesticides). Listed below are some examples of the types of waste received at the Facility:

1. Liquid paint, thinners, fuels, resins;
2. Alkaline sludge;
3. Alkaline liquid;
4. Mixed organic solvents;
5. Spent activated carbon;
6. Paint sludge, adhesives, resins;
7. Filter cake sludge;
8. Mercury batteries for mercury consolidation;
9. Halogenated organic solvents;
10. Soil and absorbent with organics;
11. Inorganic solid debris;
12. Nickel-cadmium batteries;
13. Lead shot and wheel weights;
14. Automobile batteries;
15. Solid and liquid pesticides;
16. Rags and debris;
17. Acids with organics;
18. Mineral/organic acid liquid; and
19. Poison and flammable aerosols.

Hazardous waste codes to be accepted at the Facility are listed in Table 1.

8.2 Unacceptable Wastes

Waste streams prohibited from acceptance at the Facility include:

1. Polychlorinated biphenyls of a type or level regulated by TSCA (see 40 CFR Part 761), unless exempted, excluded or otherwise authorized pursuant to TSCA regulations (i.e. PCB waste in quantities greater than 500 gallons at concentrations greater than 50 PPM);
2. Mixed waste (wastes that contain both a hazardous component regulated under Subtitle C of RCRA and a radioactive component consisting of source, special nuclear, or byproduct material regulated under the Atomic Energy Act);
3. DOT "Class 1" Explosives as defined in 49 CFR 173. 50 and forbidden explosives as defined in 49 CFR 173.54;
4. Biohazardous medical waste as defined by AAC R 18-13-1401;
5. K-Listed industry-specific wastes; and
6. F-Listed dioxin-containing wastes.
7. Lithium-ion batteries.

9 LISTING OF PERMITS

The Facility is located in unincorporated Yuma and is not subject to City licensing and permitting. Since purchasing the Facility property, the only permits which have been applied for and obtained have to with construction of the main building. Construction of the main building required a permit to construct a building and a septic system from Yuma County Department of Development Services. Sydcol also designed and installed a 121,000-gallon water tank for exclusive use in fire suppression which was reviewed and approved by Yuma County for building and fire code compliance.

TABLE

Table 1
AA Sydcol Hazardous Wastes

Waste type	RCRA Waste Codes	HMWUs	Estimated Annual Quantity (tons)
Ignitables	D001	1, 2, 3	30,000
Corrosives	D002	1, 2, 3	20,000
Reactives	D003	1, 2, 3	200
Toxicity: Heavy metals	D004-011	1, 2, 3	100
Toxicity: pesticides/herbicides	D012-017, 020, 031	1, 2, 3	100
Toxicity: Volatile organics	D018-019, 021-022, 028-029, 035, 039-040, 043	1, 2, 3	32,500
Toxicity: Semi-volatile organics	D022-027, 032-034, 036-038, 041-042,	1, 2, 3	200
2,4-dinitrotoluene, nitrobenzene	D030, D036	1, 2, 3	2
Halogenated compounds: degreasing	F001	1, 2, 3	4,000
Halogenated compounds: solvents	F002	1, 2, 3	4,000
non-Halogenated compounds solvents	F003-005	1, 2, 3	8,000
Listed electroplating wastes	F006-009	1, 2, 3	11,000
Listed metal finishing wastes	F010-012, 019	1, 2, 3	2,500
Chlorinated aliphatic hydrocarbons	F024-026	1, 2, 3	10
Listed wood-preserving wastes	F032, F034-035	1, 2, 3	10
Refinery WW treatment sludges	F037-038	1, 2, 3	10
Hazardous leachates	F039	1, 2, 3	10
P-listed commercial chemicals	P001-P205	1, 2, 3	100
Commercial grade acetone	U002	1, 2, 3	100
Commercial grade benzene	U019	1, 2, 3	100
Commercial grade 1-butanol	U031	1, 2, 3	20
Commercial grade methanol	U154	1, 2, 3	100
Commercial grade methyl-ethyl ketone	U159	1, 2, 3	100
other U-listed commercial chemicals	U001, 003-018, 020-030, 032-153, 154-158, 160-411	1, 2, 3	200
Total			113,362

APPENDICIES

APPENDIX A

Appendix A
Acronyms and Definitions

AAC	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
ADHS	Arizona Department of Health Services
ASTM	America Society for Testing and Materials
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CP	Contingency Plan
CSAP	Closure Sampling and Analysis Plan
DEA	Drug Enforcement Agency
DEUR	Declaration of Environmental Use Restriction
DOT	Department of Transportation
DQO	Data Quality Objectives
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
Facility	AA Sydcol Yuma Waste Transfer Facility
Facility Manager	The Facility Manager includes the designated responsible person on-site.
FEMA	Federal Emergency Management Agency
FID	Flame Ionization Detector
Generator	A facility, by site, whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation. A generator can be the facility or their authorized representative.
HWMU	Hazardous Waste Management Unit
LMS	Light Material Service container handling material in which one or more of the organic constituents has a vapor pressure greater than 0.3 kilopascals at 20°C and the total concentration of the pure organic constituents with a vapor pressure greater than 0.3 kPa at 20°C is equal to or greater than 20 percent by weight.
LDR	Land Disposal Restrictions
LQG	Large Quantity Generator

LQM	Laboratory Quality Manual
mg/L	Milligrams Per Liter
NAICS	North American Industrial Classification System
NRSRL	Non-residential Soil Remediation Level
OSHA	Occupational Safety and Health Act
OVA	Organic Vapor Analyzer
PCB	Polychlorinated Biphenyl
PID	Photo-ionization Detector
PPE	Personal Protective Equipment
PPM	Parts Per Million
SQG	Small Quantity Generator
QA	Quality Assurance
QC	Quality Control
RCRA	Resource Conservation and Recovery Act
RSRL	Residential Soil Remediation Level
SARA	Superfund Amendments and Reauthorization Act
SIC	Standard Industrial Classification
SVOC	Semi-volatile Organic Compound
SWMU	Solid Waste Management Unit
Sydcol	AA Sydcol, LLC
TSCA	Toxic Substances Control Act
UTL	Upper Tolerance Limit
VOC	Volatile Organic Compound
VSQG	Very Small Quantity Generator
WAP	Waste Analysis Plan
WPS	Waste Profile Sheet