UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6
DALLAS, TEXAS

IN THE MATTER OF:	§	CONSENT AGREEMENT AND FINAL ORDER
RINECO CHEMICAL INDUSTRIES, LLC	§	Docket No. RCRA-06-2021-0943
RESPONDENT	§	

CONSENT AGREEMENT

I. PRELIMINARY STATEMENT

1. This Consent Agreement and Final Order ("CAFO") is entered into by the United States Environmental Protection Agency Region 6 ("EPA" or "Complainant") and Rineco Chemical Industries, LLC ("Respondent"). The facility covered by this CAFO is located at 1007 Vulcan Road, Haskell, Arkansas ("Rineco Facility").

2. Notice of this action has been given to the State of Arkansas, under Section 3008(a)(2) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6928(a)(2).[1]

3. For the purpose of these proceedings, Respondent admits the jurisdictional allegations herein. However, Respondent neither admits nor denies the specific factual allegations and conclusions of law contained in this CAFO. This CAFO states a claim upon which relief may be granted.

[1] On January 25, 1985, the State of Arkansas received final authorization for its base Hazardous Waste Management Program (50 Fed. Reg. 1513). Subsequent revisions have been made to the Arkansas Hazardous Waste Program and authorized by the EPA. Except as otherwise provided, all citations found within this order are to the "EPA-Approved Arkansas Statutory and Regulatory Requirements Applicable to the Hazardous Waste Management Program" dated October 2016, incorporated by reference under 40 C.F.R. § 272.201(c)(1)(i) effective on November 13, 2017. 82 Fed. Reg. 43189 (September 13, 2017); 40 C.F.R. 272.201: Arkansas State-Administered Program: Final Authorization. References and citations to the "EPA-Approved Arkansas Statutory and Regulatory Requirements Applicable to the Hazardous Waste Management Program" may vary slightly from the State of Arkansas' published version.

4. Respondent waives any right to contest the allegations and its right to appeal the proposed final order accompanying the Consent Agreement and waives all defenses that have been raised or could have been raised to the claims set forth in this CAFO.

5. This CAFO resolves Respondent's liability for Federal civil penalties for the violations and facts that are alleged herein.

6. Respondent consents to the following: issuance of this CAFO hereinafter recited; the assessment and payment of the stated civil penalty in the amount and by the method set out in this CAFO; and to the specific stated compliance order.

7. Complainant and Respondent agree to the use of electronic signatures for this matter. EPA and Respondent further agree to electronic service of this Consent Agreement and Final Order, pursuant to 40 C.F.R. § 22.6, by email to the following addresses:

To EPA:

Moore.Nathaniel@epa.gov

To Respondent:

Janessa.Glenn@klgates.com

II. JURISDICTION

8. This CAFO is issued by EPA pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), as amended by the Hazardous and Solid Waste Amendments of 1984, and is simultaneously commenced and concluded through the issuance of this CAFO under 40 C.F.R. §§ 22.13(b), 22.18(b)(2), and 22.18(b)(3).

9. Respondent agrees to undertake and complete all actions required by the terms and conditions of this CAFO. In any action by the EPA or the United States to enforce the terms of this CAFO, Respondent agrees not to contest the authority or jurisdiction of the EPA to issue or

enforce this CAFO. Furthermore, Respondent agrees not to contest the validity of this CAFO, or its terms or conditions.

III. FINDINGS OF FACT AND CONCLUSIONS OF LAW

10. Respondent is a limited liability company registered to do business in the State of Arkansas at the times relevant to this CAFO.

11. Respondent is a "person" within the meaning of Section 1004(15) of RCRA, 42 U.S.C. § 6903(15); and Arkansas Pollution Control and Ecology Commission Regulation Number ("APC&E Commission Reg. No.") 23, § 260.10 (2012).

12. At all times relevant to this CAFO, Respondent was an "owner" or "operator" of the Rineco Facility within the meaning of APC&E Commission Reg. No. 23, § 260.10 (2012).

13. The Rineco Facility was assigned the EPA ID# ARD981057870.

14. Arkansas Department of Environmental Quality[2] issued a permit to the Rineco Facility to operate a hazardous waste management facility-Permit Number HW-28H-RN1 (July 2008).

15. Between May 7-11, 2018, EPA conducted an inspection at the Rineco Facility and conducted as subsequent records review to determine compliance with RCRA and the regulations promulgated thereunder (the "Investigation").

16. On November 21, 2019, EPA conferred with Respondent regarding the violations alleged herein and provided an opportunity for Respondent to submit additional information or materials. Respondent provided supplemental information on December 20, 2019 in response to the meeting. Further information was requested and provided regarding the alleged violations on

[2] The Arkansas Department of Energy and Environment Division of Environmental Quality is now the current title of the Department formerly known as the Arkansas Department of Environmental Quality. At the time of the issuance of Permit Number HW-28H-RN1 in July 2008, the Department was the Arkansas Department of Environmental Quality.

April 24, 2020; July 2, 2020; July 27, 2020; September 1, 2020; September 15, 2020; November 5, 2020; December 9-10, 2020; December 21, 2020; and January 22, 2021.

Claim 1: Permit Violation (Failure to Provide Notification of Low-BTU Hazardous Waste)

17. EPA hereby restates and incorporates by reference Paragraphs 1 through 16.

18. Section 3005(c)(3) of RCRA, 42 U.S.C. § 6925(c)(3), provides: "[. . .] each permit issued under this section shall contain such terms and conditions as the Administrator (or the State) determines necessary to protect human health and the environment."

19. APC&E Commission Regulation No. 23, § 270.32(b)(2): "Each permit issued under A.C.A. §§ 8-7-201 et seq. shall contain terms and conditions as the Administrator or the Director determines necessary to protect human health and the environment." *See also* 40 C.F.R. § 270.32(b)(2): "Each permit issued under section 3005 of this act shall contain terms and conditions as the Administrator or State Director determines necessary to protect human health and the environment."

20. Module XV – SPECIAL CONDITIONS, D. NOTIFICATION REQUIREMENTS FOR LOW BTU HAZARDOUS WASTE, of RCRA Permit 28H-RN1, provides: "The permittee must provide a written notification to the generator, recycler, and ADEQ when hazardous waste with the hazardous waste codes [omitted] is blended for energy recovery unless the hazardous waste, as generated by the original generator of the waste, meets one of the following exceptions [non-pertinent exceptions omitted] 3. Any of the listed and characteristic hazardous wastes listed in Module XV in Condition D of the Permit that, at the point of generation, have reasonable heating value greater than or equal to 5,000 BTU/lb."

21. Respondent operates a waste-water treatment unit for the treatment and disposal of wastewaters generated as a result of the facility operations.

22. Wastewaters treated in this unit express both the characteristics of hazardous waste pursuant to Subsection C of APC&E Commission Regulation No. 23, Part 261 or have been mixed with wastes which are listed in Subsection D of APC&E Commission Regulation No. 23, Part 261.

23. As part of the wastewater treatment unit, Respondent operates two thin-film evaporators which generate solid residue. This residue is blended into the facility's hazardous waste derived fuels and is destined for incineration.

24. The thin-film evaporator residue is a solid waste and is derived from the treatment of listed waste. Therefore, it is a hazardous waste.

25. During the investigation, Respondent provided a paper written by Respondent's employee, acknowledging that residue from the Thin-film evaporator intermittently fails to meet a heating value of at least 5,000 BTU/lb when blended for energy recovery.

26. At the time of this CAFO, Respondent provided no records to indicate it has filed a written notification related to their permit's low-BTU Waste requirement and provided no records to indicate it provided any notification to any party for low-BTU wastes.

27. EPA finds Respondent failed to comply with notification requirement for Notification of Low-BTU Hazardous Waste in violation of Module XV – SPECIAL CONDITIONS, D. NOTIFICATION REQUIREMENTS FOR LOW BTU HAZARDOUS WASTE, of Respondent's RCRA Permit 28H-RN1.

Claim 2: Failure to Comply with Test Methods and Procedures for Leak Detection Monitoring

28. EPA hereby restates and incorporates by reference Paragraphs 1 through 16.

29. Respondent's Hazardous Waste Permit requires Respondent to comply with the air emissions standards of Arkansas Regulation Number 23, Section 264, Subsections AA, BB, and CC.

30. APC&E Commission Regulation No. 23, Part 264, Subsection BB requires Respondent to monitor applicable equipment for leaks in accordance with the procedures in APC&E Commission Regulation No. 23, § 264.1063(b).

31. APC&E Commission Regulation No. 23, §§ 264.1063(b)(1) and (3) require leak detection monitoring to comply with Reference Method 21 in 40 C.F.R. Part 60, and requires the detection instrument be calibrated before use on each day of its use by the procedures specified in Reference Method 21.

32. APC&E Commission Regulation No. 23, § 264.1063(b)(4) requires instruments used for leak detection monitoring be calibrated with zero air (less than 10 ppm of hydrocarbon in air) and a mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.

33. Respondent operates equipment that is subject to the Air Emission Standards for Equipment Leaks of APC&E Commission Regulation No. 23, Part 264, Subsection BB.

34. Respondent calibrates its monitoring instruments using a mixture of isobutylene and zero air.

35. During the Investigation, EPA found Respondent calibrated its monitoring instruments using a mixture of isobutylene and air without applying a required correction factor for the difference in calibration gases.

36. During the Investigation, Respondent's employees indicated the correction factor had never been applied to the monitoring results the facility used to determine Respondent's

compliance with the air emissions standards of Arkansas Regulation Number 23, Section 264, Subsections AA, BB, and CC.

37. During the investigation, EPA reviewed the facility's compliance monitoring records for the previous 60 months on May 10, 2018, and confirmed that the correction factor was never documented and/or applied.

38. Therefore, EPA finds Respondent failed to properly record in its facility's compliance monitoring logs and calibrate its monitoring instruments pursuant to Method 21 without applying the necessary correction factor in violation of the requirements of APC&E Commission Regulation No. 23, § 264.1063(b).

Claim 3: Failure to submit accurate information in its Hazardous Waste Permit Application

39. EPA hereby restates and incorporates by reference Paragraphs 1 through 16.

40. APC&E Commission Regulation No. 23, § 270.16(g) requires hazardous waste facilities to provide detailed plans and descriptions of how the secondary containment system for each tank system will comply with the secondary containment requirements of § 264.193 in Part B of its hazardous waste permit application.

41. APC&E Commission Regulation No. 23, § 270.16(g) requires: "detailed plans and description of how the secondary containment system for each tank system is or will be designed, constructed, and operated to meet the requirements of § 264.193 (a), (b), (c), (d), (e), and (f). . ." APC&E Commission Regulation No. 23, § 264.193(f) provides: "Ancillary equipment must be provided with secondary containment (e.g., trench, jacketing, double-walled piping) that meets the requirements of paragraphs (b) and (c) of this section. . ."

42. Respondent submitted calculations for the hazardous waste storage tanks located in Building 200 in Respondent's Part B Permit Application, which indicated a capacity of 34,090 gallons.

43. The calculations did not include the displacement caused by ancillary equipment installed within the secondary containment structure, which were determined to have a displacement volume of 2,045 gallons.

44. During the Investigation, EPA found the information contained in the permit indicated a capacity of 34,090 gallons whereas the actual capacity is calculated to be 32,045 gallons when accounting for the displacement of ancillary equipment.

45. EPA finds Respondent failed to accurately indicate the actual volume of its secondary containment structure in its Part B permit application in violation of the requirements of APC&E Commission Regulation No. 23, § 270.16(g).

IV. COMPLIANCE ORDER

46. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), Respondent has taken or hereby ordered to take the following actions:

a. Respondent has submitted an amendment to the waste analysis plan in its permit application whereby each container of hazardous waste generated from its thin-film evaporators will be evaluated for the BTU and/or TOC content in the same manner it evaluates waste arriving from offsite sources. See Attachment B [Copy of Certification and Amendment, Section C. Waste Analysis Plan submittal to ADEQ with receipt stamp].

b. Respondent has certified that it is in compliance with the requirement to calibrate emissions detection equipment used for Method 21 monitoring of

components subject to 40 C.F.R. Part 264, Subparts BB and CC with either methane or hexane as required in Subpart BB or by applying the appropriate correction factor when calibrating with isobutylene. See Attachment A [Copy of Certification].

c. Respondent has submitted an amendment to its permit application correcting its secondary containment calculations to allow for the displacement of the ancillary equipment. See Attachment B [Copy of Certification and Copy of Amendment submittal to ADEQ with receipt stamp].

47. In all instances in which this CAFO requires written submission to EPA, the submittal made by Respondent shall be signed by an owner or officer of the Respondent, and shall include the following certification:

> I certify under the penalty of law that this document and all its attachments were prepared by me or under my direct supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Copies of all documents required by the CAFO shall be sent to the following:

John Penland
U.S. Environmental Protection Agency
Enforcement and Compliance Assurance Division (ECDSR)
1201 Elm Street, Suite 500
Dallas, Texas 75270
Penland.John@epa.gov

48. Respondent reserves the right to raise any and all defenses related to the enforcement of the Terms of this Consent Agreement by EPA.

V. TERMS OF SETTLEMENT

A. Penalty Provisions

49. Pursuant to the authority granted in Section 3008 of RCRA, 42 U.S.C. § 6928, and upon consideration of the entire record herein, including the above referenced Findings of Fact and Conclusions of Law, which are hereby adopted and made a part hereof, upon the seriousness of the alleged violations, and Respondent's good faith efforts to comply with the applicable regulations, it is ordered that Respondent be assessed a civil penalty of **Seventy-Five Thousand Dollars ($75,000.00)**.

50. The penalty shall be paid within thirty (30) calendar days of the effective date of this CAFO and made payable to Treasurer, United States of America.

51. The following are Respondent's options for transmitting the penalties:

Checks sent via U.S. Postal Mail (including certified mail) or U.S. Postal Service Express Mail should be remitted to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

Checks sent via Overnight Mail (non-U.S. Postal Service) should be remitted to:

U.S. Bank
Government Lockbox 979077
U.S. EPA Fines and Penalties
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63101
314-418-1028

Wire Transfers should be remitted to:

Federal Reserve Bank of New York
ABA: 021030004

Account No. 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York, NY 10045

The case name and docket number **(In the Matter of Rineco Chemical Industries, LLC Docket No. RCRA-06-2021-0943)** shall be documented on or within your chosen method of payment to ensure proper credit.

52. Respondent shall send a simultaneous notice of such payment to the following:

Lorena S. Vaughn
Regional Hearing Clerk (ORC)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
Vaughn.Lorena@epa.gov

Margaret Osbourne, Branch Chief
Waste Enforcement Branch (ECDS)
Enforcement and Compliance Assurance Division
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
Osbourne.Margaret@epa.gov

Your adherence to this request will ensure proper credit is given when penalties are received by EPA.

53. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R. § 13.11, unless otherwise prohibited by law, EPA will assess interest and late payment penalties on outstanding debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Interest on the civil penalty assessed in this CAFO will begin to accrue on the effective date of the CAFO and will be recovered by EPA on any amount of the civil penalty that is not paid within thirty (30) calendar days of the civil penalty's due date and will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a). Moreover, the costs of

the Agency's administrative handling of overdue debts will be charged and assessed monthly throughout the period the debt is overdue in accordance with 40 C.F.R. § 13.11(b). EPA will also assess a $15.00 administrative handling charge for administrative costs on unpaid penalties for the thirty (30) day period after the payment is due and an additional $15.00 for each subsequent thirty (30) day period the penalty remains unpaid. In addition, a penalty charge of up to six percent (6%) per year will be assessed monthly on any portion of the debt that remains delinquent more than ninety (90) days pursuant to 40 C.F.R. § 13.11(b). Should a penalty charge on the debt be required, it shall accrue from the first day payment is delinquent pursuant to 31 C.F.R. § 901.9(d). Other penalties for failure to make a payment may also apply.

54. For purposes of the identification requirement in Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), and 26 C.F.R. § 162-21(b)(2), performance of the Compliance Order and payment of the civil penalty are restitution, remediation, or required to come into compliance with the law.

B. Costs

55. Each party shall bear its own costs and attorney's fees. Furthermore, Respondent specifically waive its right to seek reimbursement of its costs and attorney's fees under the Equal Access to Justice Act (5 U.S.C. § 504), as amended by the Small Business Regulatory Enforcement Fairness Act (P.L. 04-121), and any regulations promulgated pursuant to those Acts.

C. Termination and Satisfaction

56. Respondent has attached as Attachment C its certification that it has complied with the Ordering (Compliance) provisions of this Consent Agreement. Upon confirmation of receipt of

the penalty amount in Paragraph 49 of this Consent Agreement and by the means established by Paragraph 51 of the Consent Agreement, this CAFO is terminated.

D. Effective Date of Settlement

57. This CAFO shall become effective upon filing with the Regional Hearing Clerk.

THE UNDERSIGNED PARTIES CONSENT TO THE ENTRY OF THIS CONSENT AGREEMENT AND FINAL ORDER:

FOR THE RESPONDENT:

Date: 7/21/21

VP of Ops
Rineco Chemical Industries, LLC

FOR THE COMPLAINANT:

Cheryl T. Seager

Digitally signed by CHERYL SEAGER
DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=CHERYL SEAGER, 0.9.2342.19200300.100.1.1=68001003651793
Date: 2021.07.21 10:26:42 -05'00'

Date: July 21, 2021

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

FINAL ORDER

Pursuant to the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, 40 C.F.R. Part 22, the foregoing CAFO is hereby ratified. This Final Order shall not in any case affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief, or criminal sanctions for any violations of law. This Final Order shall resolve only those causes of action alleged herein. Nothing in this Final Order shall be construed to waive, extinguish, or otherwise affect Respondent's (or its officers, agents, servants, employees, successors, or assigns) obligation to comply with all applicable federal, state, and local statutes and regulations, including the regulations that were the subject of this action. Respondent is ordered to comply with the terms of settlement and the civil penalty payment instructions as set forth in the Consent Agreement. Pursuant to 40 C.F.R. § 22.31(b) this Final Order shall become effective upon filing with the Regional Hearing Clerk.

Date: _____

THOMAS RUCKI

Digitally signed by THOMAS RUCKI
DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=THOMAS RUCKI, 0.9.2342.19200300.100.1.1=68001003655804
Date: 2021.07.22 14:27:46 -05'00'

Thomas Rucki
Regional Judicial Officer

CERTIFICATE OF SERVICE

I hereby certify that the original of the foregoing Consent Agreement and Final Order was electronically delivered to the Regional Hearing Clerk, U.S. EPA Region 6, 1201 Elm Street, Suite 500 Dallas, Texas 75270, and that a true and correct copy of the CAFO was sent to the following by the method below:

Copy via Email to Respondent:

Janessa.Glenn@klgates.com

Copy via Email to Complainant:

Moore.Nathaniel@EPA.gov
Penland.John@EPA.gov

EPA Region 6

CONSENT AGREEMENT AND FINAL ORDER
Docket No. RCRA-06-2021-0943
ATTACHMENT A

CONSENT AGREEMENT AND FINAL ORDER
Docket No. RCRA-06-2021-0943
ATTACHMENT A

RINECO
A HERITAGE Company

HAZARDOUS WASTE MANAGEMENT FACILITY
HASKELL, ARKANSAS

OWNER OR OFFICER CERTIFICATION

Re: CAFO Provision 46.b

I certify under the penalty of law that Rineco Chemical Industries, LLC is in compliance with the requirement to calibrate emissions detection equipment used for Method 21 monitoring of components subject to 40 C.F.R. Part 264, Subparts BB and CC with either methane or hexane as required in Subpart BB or by applying the appropriate correction factor when calibrating with isobutylene. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date:	July 21, 2021
Signature:	
Title:	V.P. of Operations - Benton

CONSENT AGREEMENT AND FINAL ORDER
Docket No. RCRA-06-2021-0943
ATTACHMENT B

CONSENT AGREEMENT AND FINAL ORDER
Docket No. RCRA-06-2021-0943
ATTACHMENT B

RINECO
A HERITAGE Company

HAZARDOUS WASTE MANAGEMENT FACILITY
HASKELL, ARKANSAS

OWNER OR OFFICER CERTIFICATION

Re: CAFO Provisions 46.a and 46.c

I certify under the penalty of law that this document and all its attachments were prepared by me or under my direct supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date:	July 21, 2021
Signature:	
Title:	V.P. of Operations - Benton

HERITAGE

HAND DELIVERED LETTER AND TRANSMITTAL

DELIVERED BY: Larry D. Williams DATE: 7/7/2021 TIME: 2:50
RECEIVED BY: (Print) Julia Raney (Signature) JRaney

TO: Mr. Jarrod Zweifel

RECEIVED
JUL 07 2021

ADEQ
5301 Northshore Drive
North Little Rock, AR 72118

The attached transmittal of:

1. Class 1 Part B Modifications – July 7, 2021: add TOC as a supplemental analysis method in the Waste Analysis Plan.

From: Larry D. Williams, Ph.D.
Director,
Environmental and Regulatory Compliance

Rineco
P.O. Box 729
Benton, AR 72018

HERITAGE®

P.O. Box 729
Benton, AR 72018

July 07, 2021

Mr. Jarrod Zweifel, Associate Director
Office of Land Resources
Arkansas Department of Energy and Environment
5301 Northshore Drive
North Little Rock, AR 72118

Re: Rineco - Haskell, AR
Permit No. 28H-RN2
EPA ID #: ARD981057870: AFIN: 63-00094
Class 1 Part B Modifications – July 7, 2021

Dear Mr. Zweifel;

Please find enclosed part B modification documents dated July 07, 2021, to modify our part B application. These documents are submitted as a Class 1 modification to add total organic carbon (TOC) as a supplemental analysis method in the waste analysis plan.

The addition of this information to the waste analysis plan most closely identifies with informational changes under §270.42, Appendix I.A.1 (Administrative and informational changes). Thus, we are submitting the documents as a Class 1 modification.

Please refer to the enclosed errata page with Attachment 1 indicating the included replacement pages and changes made to the part B.

If you have any questions or comments, please feel free to contact me.

Sincerely,

Larry D. Williams, Ph.D., REM, CHMM
Director,
Environmental and Regulatory Compliance

LDW/lf

Enclosures:
Errata w/ Attachment 1
Part B Modification Replacement Pages (July 07, 2021) (1 copy including 13 pages)

OWNERS CERTIFICATION

I certify under penalty of law that this subject document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date: July 7, 2021

Signature: Barry D. Williams

Title: Director, Environmental & Regulatory Compliance

ERRATA
w/ Attachment 1

The specific sections that have undergone revision as of July 07, 2021 include the following:

The part A and B title page and side panel have been replaced.

Part B changes:

1. Section A pages, including cover page and Section A-1 (Owner Certification) has been re-executed and replaced.

2. Section C pages, including cover page, C-ii, C-3, C-4, C-9, C-13, C-14 and C-15 and Table 1, have been replaced.

Attachment 1 that follows indicates text changes to Section C (title pages and pages changed only due to repagination have been omitted).

SECTION C

Special Waste:

Type 1: This material is off specification or out-of-date consumer products in small quantity packaging. Examples include out-of-date cosmetics such as fingernail polish, or out-of-date consumer products such as tubes of glue or paint.

Type 2: This material is off specification, out of date, surplus unused inventory or products in the original packaging containers. Examples include containers, pallets, and various large containers of basic chemicals and formulated products.

Type 3: This material includes containers of debris such as rags, paper towels, plastic or hardened polymers, dirt, wood, etc.

Type 4: This material arrives in the facility in transport to another TSDF for processing. The shipping container is inspected and subsequently put into shipment to the alternate TSDF.

Rineco analyzes all incoming waste, including MSW, supplementing the characterization provided by the generator. In many cases, obtaining a representative sample is not practical due to the individual product packaging (Type 1) or the nature of the debris materials (Type 3). With larger containers of off spec or out of date products (Type 2), the generator information provides a comprehensive statement of the composition via SDS, product formula, or product analysis. Sufficient information is supplied to evaluate material handling and processing techniques at the facility. Waste received in route to another TSDF for processing (Type 4), will not be processed at Rineco. In this circumstance the container seal is not broken; the manifest and other documentation is reviewed for special handling instructions. Sampling of contents is not conducted as it is neither advisable nor necessary. When a material has been designated "Miscellaneous Special Waste", the possibility of not sampling or modifying the frequency of sampling can be noted at any time.

C-1.2 Issues Which May Require a Sample

The generator may not be able to obtain a representative sample (still bottoms, for example, might not be accessible until removed from the tank for shipment), or a representative sample may not exist at the time of profiling (waste from a clean-out may not have been gathered at the time of the profile preparation). Therefore, emphasis is placed on generator knowledge backed up by analysis on receipt.

If an issue arises upon review of generator information, Rineco may request a sample for further analysis. The sample will be analyzed to answer specific questions that may pose safety, regulatory, or processing problems. Examples include, but are not limited to:

- Metal bearing wastes and low BTU wastes might also require additional testing,

such as TOC analysis for thin-film evaporator waste, to ensure that fuel blending does not constitute impermissible dilution according to APC&EC Rule~~egulation~~ 23, Section 268.3.

- A waste might contain chemicals which have unknown solubility or stability in the Rineco fuel or feed stock blend. A sample would be checked for compatibility with fuel.

- The process generating the waste might have the possibility to be associated with some chemical not allowed at Rineco due to regulatory limitations (such as PCBs or a chemical which is unstable or explosive). A sample would be checked for the specific component(s) of interest or specific property of the component(s).

- The codes F006-F019, K011, K013, K027, K047, U006, U223, U160, U033, U096, U133, U189 and U234 are not stored if they have the "characteristic of reactivity". Profiles for these wastes will not be approved without the analysis of a sample which demonstrates that the characteristic of reactivity does not apply. Wastes K044, K045, and D003 [other than aerosol cans shipped under the D003 code, and cyanide or sulfide bearing wastes under Reg. 23 §261.23(a)(5)] are also listed as concerns, but these are waste codes Rineco has never been permitted to receive, so they would be rejected at the profile level. Analysis may include the fingerprint parameters at a minimum (Table 1) or analysis for specific organic constituents depending on generator information and the code applied.

C-1.3 Technical Review (Approval or Denial)

Technical review includes consideration of the impact of management of waste (ignitability, corrosivity, reactivity and toxicity) with respect to safety, regulations, storage, and processing. In addition to granting approval or denial of the WMP, the profile specialist may make notes that will reflect the handling of the specific waste such as special processing instructions or designation as MSW in the comment section of the WMP.

Generally, waste materials are managed by Rineco as if they are potentially ignitable. The facility maintains the capability to perform a flash point determination when and if it is necessary to verify ignitability.

Wastes having the characteristic of corrosivity are processed by Rineco. The characterization of liquid aqueous wastes is verified by measurement of pH.

Wastes received by Rineco that require sampling may undergo various screening analysis to identify waste meeting the definition of reactivity. These tests may include:

- Water Compatibility Screen

- Cyanide Screen

SECTION C

Each manifest line is designated by a number (e.g., 1, 2, 3, ...). Representative portions from each container are placed in clean sample jars per Rineco sampling procedures. The sample jar is labeled with the sample number (RCI #) as well as IC #, which is traceable to the generator, manifest number, and the manifest line letter. Sample numbers (RCI #'s) are Rineco's internal, unique numbers used to identify the sample jars during the sampling process.

2.2.4.2 Pallets (Containers less than 15 gallons)
A sample is extracted from a package of each different type of material on the pallet or at least 10% of the packages. Up to eight pallets may be in a composite if the pallet contents are from the same manifest line item and have the same phase(s).

C-2.3 Waste Analysis

2.3.1 Overview

Acceptance analysis determines if the waste conforms to generator supplied information and the manifest description. If "fingerprint" parameters agree with the profile information no further analysis is required for acceptance. Supplemental analysis is performed to further identify wastes as appropriate. These results provide site management with another level of confidence concerning the proper means of treatment.

In the laboratory, individual samples from the same manifest line item may be further composited for analysis. Individual samples from different manifest line items may be composited if the materials are under the same Waste Profile and have the same DOT shipping name and hazard class. For PCB screening analysis any compatible material may be composited as long as the permit level criteria are achieved.

Rineco will employ analytical methods which provide chemical information on both the bulk properties of the waste material and the individual constituents as required to meet the goals of waste characterization verification. Relevant applications that may be utilized are outlined below.

2.3.2 Fingerprint Analysis

The results of the fingerprint analysis parameters may be utilized to screen out specific non-permitted wastes. The fingerprint results also provide information on the waste to allow fuel or feed-stock blending to the specifications required by the fuel user or the process using the feed-stock. The various analyses that may be utilized are listed in Table 1 and the interpretation of their results is given in the following subsections.

2.3.2.1 Sampler's Test and Observations
Tests and observations of the samplers will be part of initial fingerprinting.

SECTION C

2.3.3.5 Analysis of Cyanides and Sulfides

Rineco will conduct an initial screen for cyanides or sulfides to determine any detectable response. Available methods and guidance will be used, including SW-846: "Test Method for Determining Hydrogen Cyanide Released From Waste" and "Test Method for Determining Hydrogen Sulfide Released From Waste", in order to determine the appropriate management method for the waste. If the results of the quantitative test indicate that the waste may meet the characteristic of reactivity, the waste will be managed in accordance with the procedures stated under 2.3.2.2 Laboratory Tests for Cyanide and Sulfides above.

2.3.3.6 Acidity

The sample is titrated using a pH meter and a standard sodium hydroxide solution to a pH of 4.5. The results of this analysis are used in waste processing to allow proper handling of low pH materials.

2.3.3.7 Water by Karl Fischer

Analysis for water content is used to ensure waste meets the permit requirements at the end user's facility. It is also a good indicator that the waste is being correctly described by the generator with respect to water content.

2.3.3.8 Percent Solids

Analysis for the percent solid content is used to ensure waste meets the permit requirements at the end user's facility. It is also a good indicator that the waste is being correctly described by the generator with respect to solids content.

2.3.3.9 Density

A known volume of waste is weighed giving density of the material. The density is used to determine the suitability of solid waste to be suspended into liquid fuels.

2.3.3.10 Viscosity

Viscosity is conducted using a viscometer. The viscosity is used to determine the suitability of liquid waste to suspended solids in the preparation of fuel blends, and to indicate the ease/difficulty expected in pumping the waste.

2.3.3.11 Flash Point

Flash point is conducted using a Pensky Martin Closed Cup flash point apparatus. The flash point is used to verify the ignitability of the waste.

2.3.3.12 Total Organic Carbon (TOC)

TOC is determined by calculating the difference of total carbon and inorganic carbon in water by oxidative combustion-infrared analysis. With the lack of adequate waste Btu value, an adequate TOC value ensures that impermissible dilution does not occur when blended.

SECTION C

TABLE 1: "Fingerprint Analysis" Parameters and Methods

Parameter	Current Method
Radioactivity	Radiation Detection System[1]
Fuel/Feed-stock Compatibility	Mixing of Wastes
pH	pH Meter or Indicator paper
PCB	Gas Chromatography[1]
Heat of Combustion	Bomb Calorimeter[1]
Halogen	Mercuric Nitrate Titration[2]
Water Solubility/Compatibility	Mixing wastes with water
Cyanides	Cyanide indicator spot test
Oxidizers	Potassium iodide-starch[3]
Peroxides	Peroxide Test Strip[3]
Sulfides	Lead Acetate Test Strip[3]
Total Organic Carbon (TOC)	**9060A**

1) The referenced instruments are used currently at Rineco. Should an improved instrument become available and/or is approved by the EPA, Rineco may change the analysis by changing the Rineco Procedure.
2) This titration, although it is the current industry standard, uses a toxic mercury reagent with associated disposal problems. Rineco is currently evaluating other EPA approved methods, and may change the method of analysis by changing the Rineco procedure.
3) These test strips are currently the method used by Rineco, should an improved method become available and approved by the EPA, Rineco may change the procedure.

Rineco procedures are updated as EPA publishes new versions of EPA SW-846 and the test methods are utilized by Rineco.

RINECO
A HERITAGE Company

1007 Vulcan Road
Haskell, Arkansas

Resource Conservation & Recovery Act (RCRA)

Hazardous Waste Management Facility Part A & B Permit Application

July 07, 2021

Rineco

Haskell, AR

Hazardous Waste Management Facility
Part A & B Permit Application

July 07, 2021

RCRA PART B APPLICATION

RINECO
A HERITAGE Company

HAZARDOUS WASTE MANAGEMENT FACILITY
HASKELL, ARKANSAS

SECTION A

CERTIFICATIONS

REVISED: July 07, 2021

SECTION A

A-1 OWNER CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date:	July 07, 2021
Signature:	Terry D. Williams
Title:	Director, Environmental & Regulatory Compliance

RCRA PART B APPLICATION

HAZARDOUS WASTE MANAGEMENT FACILITY
HASKELL, ARKANSAS

SECTION C

WASTE ANALYSIS PLAN

REVISED: July 07, 2021

SECTION C

Special Waste:

Type 1: This material is off specification or out-of-date consumer products in small quantity packaging. Examples include out-of-date cosmetics such as fingernail polish, or out-of-date consumer products such as tubes of glue or paint.

Type 2: This material is off specification, out of date, surplus unused inventory or products in the original packaging containers. Examples include containers, pallets, and various large containers of basic chemicals and formulated products.

Type 3: This material includes containers of debris such as rags, paper towels, plastic or hardened polymers, dirt, wood, etc.

Type 4: This material arrives in the facility in transport to another TSDF for processing. The shipping container is inspected and subsequently put into shipment to the alternate TSDF.

Rineco analyzes all incoming waste, including MSW, supplementing the characterization provided by the generator. In many cases, obtaining a representative sample is not practical due to the individual product packaging (Type 1) or the nature of the debris materials (Type 3). With larger containers of off spec or out of date products (Type 2), the generator information provides a comprehensive statement of the composition via SDS, product formula, or product analysis. Sufficient information is supplied to evaluate material handling and processing techniques at the facility. Waste received in route to another TSDF for processing (Type 4), will not be processed at Rineco. In this circumstance the container seal is not broken; the manifest and other documentation is reviewed for special handling instructions. Sampling of contents is not conducted as it is neither advisable nor necessary. When a material has been designated "Miscellaneous Special Waste", the possibility of not sampling or modifying the frequency of sampling can be noted at any time.

C-1.2 Issues Which May Require a Sample

The generator may not be able to obtain a representative sample (still bottoms, for example, might not be accessible until removed from the tank for shipment), or a representative sample may not exist at the time of profiling (waste from a clean-out may not have been gathered at the time of the profile preparation). Therefore, emphasis is placed on generator knowledge backed up by analysis on receipt.

If an issue arises upon review of generator information, Rineco may request a sample for further analysis. The sample will be analyzed to answer specific questions that may pose safety, regulatory, or processing problems. Examples include, but are not limited to:

- Metal bearing wastes and low BTU wastes might also require additional testing,

such as TOC analysis for thin-film evaporator waste, to ensure that fuel blending does not constitute impermissible dilution according to APC&EC Rule 23, Section 268.3.

- A waste might contain chemicals which have unknown solubility or stability in the Rineco fuel or feed stock blend. A sample would be checked for compatibility with fuel.

- The process generating the waste might have the possibility to be associated with some chemical not allowed at Rineco due to regulatory limitations (such as PCBs or a chemical which is unstable or explosive). A sample would be checked for the specific component(s) of interest or specific property of the component(s).

- The codes F006-F019, K011, K013, K027, K047, U006, U223, U160, U033, U096, U133, U189 and U234 are not stored if they have the "characteristic of reactivity". Profiles for these wastes will not be approved without the analysis of a sample which demonstrates that the characteristic of reactivity does not apply. Wastes K044, K045, and D003 [other than aerosol cans shipped under the D003 code, and cyanide or sulfide bearing wastes under Reg. 23 §261.23(a)(5)] are also listed as concerns, but these are waste codes Rineco has never been permitted to receive, so they would be rejected at the profile level. Analysis may include the fingerprint parameters at a minimum (Table 1) or analysis for specific organic constituents depending on generator information and the code applied.

C-1.3 Technical Review (Approval or Denial)

Technical review includes consideration of the impact of management of waste (ignitability, corrosivity, reactivity and toxicity) with respect to safety, regulations, storage, and processing. In addition to granting approval or denial of the WMP, the profile specialist may make notes that will reflect the handling of the specific waste such as special processing instructions or designation as MSW in the comment section of the WMP.

Generally, waste materials are managed by Rineco as if they are potentially ignitable. The facility maintains the capability to perform a flash point determination when and if it is necessary to verify ignitability.

Wastes having the characteristic of corrosivity are processed by Rineco. The characterization of liquid aqueous wastes is verified by measurement of pH.

Wastes received by Rineco that require sampling may undergo various screening analysis to identify waste meeting the definition of reactivity. These tests may include:

- Water Compatibility Screen

- Cyanide Screen

Each manifest line is designated by a number (e.g., 1, 2, 3, ...). Representative portions from each container are placed in clean sample jars per Rineco sampling procedures. The sample jar is labeled with the sample number (RCI #) as well as IC #, which is traceable to the generator, manifest number, and the manifest line letter. Sample numbers (RCI #'s) are Rineco's internal, unique numbers used to identify the sample jars during the sampling process.

2.2.4.2 Pallets (Containers less than 15 gallons)
A sample is extracted from a package of each different type of material on the pallet or at least 10% of the packages. Up to eight pallets may be in a composite if the pallet contents are from the same manifest line item and have the same phase(s).

C-2.3 Waste Analysis

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TOC is determined by calculating the difference of total carbon and inorganic carbon in water by oxidative combustion-infrared analysis. With the lack of adequate waste Btu value, an adequate TOC value ensures that impermissible dilution does not occur when blended.

C-2.4 Laboratory Release/Acceptance Review

After laboratory analysis has been completed, an acceptance review is conducted. The analytical information obtained from the sample or sampler's information is compared to the incoming manifest and the WMP. If the waste is found to be acceptable for fuel and/or feed-stock blending, the laboratory "releases" the waste for processing. This consists of notifying production that the waste is ready for processing and providing pertinent information on fuel values, feed-stock qualities, precautions, and any restrictions. Waste remains under the custody of the lab/sampling/receiving group until released for processing, and may not be processed or otherwise handled by production.

If the waste differs from the profile or manifest description, to the extent described in Section 3, the waste is not released until resolution of the discrepancy is resolved. If the discrepancy cannot be resolved, procedures in Section 4 will take effect.

C-3 RE-PROFILING WASTE STREAMS

Since the generator's information is verified against the waste analysis on each shipment, a waste stream will be returned to the pre-acceptance characterization for re-profiling by the generator when:

- Fingerprinting analysis indicates the waste stream has changed to an extent that waste codes will have to be changed, or if waste handling will differ significantly (e.g., a waste described as "paint waste" might vary considerably in the proportions of solvents used in paints without being re-profiled, but would require a new pre-acceptance characterization from the generator if it was found to be predominantly mineral acids).

- Notification is received from the generator of significant changes in the process generating the waste stream.

- There is significant composition variability between shipments which indicates that the same waste codes and handling procedures do not apply to all shipments.

- The generator's information on the profile may be verified on a biennial (two year) basis. If a waste stream has not been received for a period of two years the waste stream will be either re-approved or re-profiled.

C-4 REJECTION OF NON-PERMITTED MATERIALS

Rineco may reject any waste or waste shipment for any reason. This can occur at any time during the process of shipment review for acceptance. Examples of the rejection

process follow below.

If analysis demonstrates that any waste material is outside of any regulatory based acceptance criteria, it will be rejected by Rineco (e.g., waste material contaminated with PCB's at or greater than 50 ppm, waste material with the characteristic of reactivity that is explosive or water reactive, etc.). This analysis may include any data review (e.g., manifest review) and visual observation (e.g., inspection of container contents) that can be used in an instance to identify such materials. This acceptance / rejection responsibility lies directly with operations and/or laboratory management. In such cases the waste material will be identified and clearly labeled as rejected materials and be physically segregated from those materials yet to be tested and those which have already been accepted. The generator will be notified and the material will either be sent to a treatment, storage, and disposal facility which is permitted to accept such materials or be returned to the generator. The applicable state and federal regulations will be followed by Rineco management during this process.

Note that acceptance of a profile with or without a sample prior to shipment does not necessarily constitute acceptance for storage or processing. The characterization verification analysis of the waste must also show the waste to be acceptable according to applicable regulation, and that it can be used as a component of fuel, treated, processed or recycled. If the waste is found not to be conforming to the profile but is a type of waste which Rineco is permitted to process, the generator will be contacted, a new or modified profile created or a "one time" exception noted (for example, if some trash and debris along with solvent waste was found in a waste container which was profiled as a solvent waste), or the waste may be rejected back to the generator or sent to an alternative TSDF.

C-5 QUALITY ASSURANCE AND QUALITY CONTROL

Rineco will maintain a Quality Assurance/Quality Control Plan (QAP) to ensure analysis carried out at the facility is of acceptable quality and precision. The QAP in Appendix C-II will contain at a minimum:

- Goals for analytical accuracy and precision and action taken when goals are not met.
- Frequency and types of QC samples used for analysis.
- Required documentation of analytical activity including record maintenance.
- Requirements for maintenance and calibration of instruments.
- Organization and responsibility of laboratory personnel.

SECTION C

TABLE 1: "Fingerprint Analysis" Parameters and Methods

Parameter	Current Method
Radioactivity	Radiation Detection System[1]
Fuel/Feed-stock Compatibility	Mixing of Wastes
pH	pH Meter or Indicator paper
PCB	Gas Chromatography[1]
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Total Organic Carbon (TOC)	9060A

1) The referenced instruments are used currently at Rineco. Should an improved instrument become available and/or is approved by the EPA, Rineco may change the analysis by changing the Rineco Procedure.
2) This titration, although it is the current industry standard, uses a toxic mercury reagent with associated disposal problems. Rineco is currently evaluating other EPA approved methods, and may change the method of analysis by changing the Rineco procedure.
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Rineco procedures are updated as EPA publishes new versions of EPA SW-846 and the test methods are utilized by Rineco.

HERITAGE®

P.O. Box 729
Benton, AR 72018

HAND DELIVERED LETTER AND TRANSMITTAL

DELIVERED BY: Larry D. Williams DATE: 6/10/2021 TIME: 2:23
RECEIVED BY: (Print) JULIA RANEY (Signature) JRaney

TO: Mr. Jarrod Zweifel

RECEIVED
JUN 10 2021

ADEQ
5301 Northshore Drive
North Little Rock, AR 72118

The attached transmittal of:

1. Class 1 Modification to expand upon the calculations of secondary containment capacity for the Building 200 tank system. Informational changes to these Calculations; Class 1 Modifications under §270.42, Appendix I.A.1 (Administrative and informational changes).

From: Larry D. Williams, Ph.D.
Director,
Environmental and Regulatory Compliance

Rineco
P.O. Box 729
Benton, AR 72018

HERITAGE®

P.O. Box 729
Benton, AR 72018

June 10, 2021

Mr. Jarrod Zweifel, Associate Director
Office of Land Resources
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: Rineco - Haskell, AR
Permit No. 28H-RN2
EPA ID #: ARD981057870: AFIN: 63-00094
Class 1 Part B Modifications – June 10, 2021

Dear Mr. Zweifel;

Please find enclosed part B modification documents dated June 10, 2021 to modify our part B application. These documents are submitted as a Class 1 modification to expand upon the calculations of secondary containment capacity for the Building 200 tank system.

Informational changes to these calculations are submitted as Class 1 modifications under §270.42, Appendix I.A.1 (Administrative and informational changes).

Please refer to the enclosed errata page with Attachment 1 indicating the included replacement pages and changes made to the part B. Please do not hesitate to call me if you have any questions or concerns.

Sincerely,

Larry D. Williams, Ph.D., REM, CHMM
Director,
Environmental and Regulatory Compliance

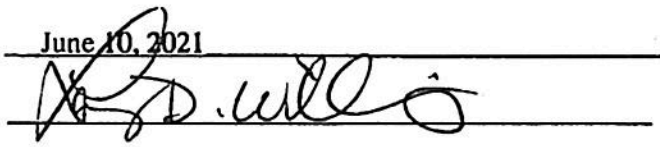
LDW/lf

Enclosures:
Errata w/ Attachment 1
Part B Modification Replacement Pages (June 10, 2021) (1 copy including 7 pages)

OWNERS CERTIFICATION

I certify under penalty of law that this subject document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date: June 10, 2021

Signature: 

Title: Director, Environmental & Regulatory Compliance

Rineco Part B Application Revisions Dated June 10, 2021

ERRATA
w/ Attachment 1

The specific sections that have undergone revision as of June 10, 2021 include the following:

The part A and B title page and side panel have been replaced.

Part B changes:

1. Section A pages, including cover page and Section A-1 (Owner Certification) has been re-executed and replaced.

2. Section D pages, including cover page, page D-21 and Appendix D-II, Figure 045, have been replaced.

Attachment 1 that follows indicates text changes to page D-21 (title pages and pages changed only due to repagination have been omitted).

containment. A perimeter 2'-4" tall structural steel curb ~~around the area~~ provides a total capacity of containment of 55,**848**~~160~~ gallons, exceeding the requirement for containment of one hundred percent ~~(100%)~~ of the largest tank **in the area** (29,400 gallons) **(See Figure 045)**. The metal seams are welded insuring that no gaps or breaks occur in the containment system. Although available, the containment system does not require capacity to store precipitation accumulation since the tank system is covered with a metal roof.

All Building 200 tank system ancillary equipment is also provided with secondary containment as required under §264.193(f), or constructed and managed in accordance with §264.193(f)(1) through (4). Where located outside of secondary containment, applicable equipment is inspected for leaks on a daily basis.

D-3b-3 Collection Tank System Secondary Containment Design and Capacity

Secondary containment for the Building 400 collection tank storage system is constructed on a 23' 6" × 18' 4" area of 8" thick reinforced concrete overlaid with 1/4-inch thick continuously welded steel plate for containment. A perimeter 28" tall structural steel curb around the area provides a total capacity of containment of approximately 6,600 gallons, exceeding the requirement for containment of one hundred percent (100%) of the largest tank (6,000 gallons). The metal seams are welded insuring that no gaps or breaks occur in the containment system. Although available, the containment system does not require capacity to store precipitation accumulation since the tank system is covered with a metal roof.

Building 400 tank system ancillary equipment is also provided as necessary with secondary containment as required under §264.193(f), or constructed and managed in accordance with §264.193(f)(1) through (4). Where located outside of secondary containment, applicable equipment is inspected for leaks on a daily basis.

D-3c Tank Corrosion and Erosion

To protect against corrosion, the exterior of the tanks and dispersers is primed and coated with aluminum rust inhibitor paint. No interior coating is required since all stored and treated wastes are compatible with unlined steel.

In accordance with §264.192, independent reviews of the bulk, collection and disperser tank systems have been performed with regard to corrosion potential. The conclusions indicate that the designs and usage are such that significant levels of corrosion are unlikely to occur. The corrosion review has been included as part of the engineering

RINECO
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1007 Vulcan Road
Haskell, Arkansas

Resource Conservation & Recovery Act (RCRA)

Hazardous Waste Management Facility Part A & B Permit Application

June 10, 2021

CAFO Attachment B (Re: 46.c)

CAFO Attachment B (Re: 46.c)

Rineco

Haskell, AR

Hazardous Waste Management Facility
Part A & B Permit Application

June 10, 2021

RCRA PART B APPLICATION

RINECO
A HERITAGE Company

HAZARDOUS WASTE MANAGEMENT FACILITY
HASKELL, ARKANSAS

SECTION A

CERTIFICATIONS

REVISED: June 10, 2021

SECTION A

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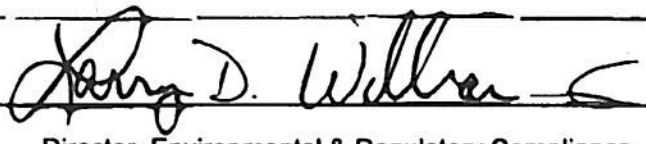
Signature:	
Title:	Director, Environmental & Regulatory Compliance

RCRA PART B APPLICATION

RINECO
A HERITAGE Company

HAZARDOUS WASTE MANAGEMENT FACILITY
HASKELL, ARKANSAS

SECTION D

PROCESS INFORMATION AND DESCRIPTIONS

REVISED: June 10, 2021

containment. A perimeter 2'-4" tall structural steel curb provides a total capacity of containment of 55,848 gallons, exceeding the requirement for containment of one hundred percent of the largest tank in the area (29,400 gallons) (See Figure 045). The metal seams are welded insuring that no gaps or breaks occur in the containment system. Although available, the containment system does not require capacity to store precipitation accumulation since the tank system is covered with a metal roof.

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In accordance with §264.192, independent reviews of the bulk, collection and disperser tank systems have been performed with regard to corrosion potential. The conclusions indicate that the designs and usage are such that significant levels of corrosion are unlikely to occur. The corrosion review has been included as part of the engineering assessments for these systems presented in Appendix D-III (disperser tanks), D-III.b

BUILDING NO. 200 CONTAINMENT CALCULATIONS

GENERAL INFORMATION
GENERAL NOTES: ALL DIMENSIONS ARE APPROXIMATE

FLOOR AREAS:
[A] OVERALL INNER BUILDING CURBED AREA = EAST-WEST FEET X NORTH-SOUTH FEET
AREA = (225 X 345) + (30 X 25/2) + (25 X 12) + (25 X 12/2) = 78,425 SQ/FT

[B] LOADING DOCK PIT/TRUCK STATION AREA = EAST-WEST FEET X NORTH-SOUTH FEET
AREA = 75 X 60 = 4,500 SQ/FT

[C] STORAGE TANKS CURBED AREA = EAST-WEST FEET X NORTH-SOUTH FEET
AREA = 30 X 132 = 3,010 SQ/FT

[D] OVERALL OUTER BUILDING CURBED AREA = PERIMETER FEET X WIDTH FEET
AREA = (25 X 222) + (275 X 21) + (322 X 25) = 20,950 SQ/FT

CONTAINER AREAS:
GENERAL CONTAINER STORAGE AREA CONTAINER "FOOTPRINT", PEAK LOADING
MAXIMUM NUMBER OF CONTAINERS STORED IN SINGLE HIGH STACK = 7,224 DRUMS
(RE: FIGURE 6-C2)
ASSUME EACH DRUM OCCUPIES 4 SQ/FT
PEAK LOADING AREA = 28,898 SQ/FT

CONTAINMENT HEIGHT:
CURB HEIGHT - INNER & OUTER OVERALL AREAS = 4" = 0.333'
CURB HEIGHT - TRUCK STATION AREA = 4" = 0.333'
CURB HEIGHT - BULK STORAGE TANKS AREA = 28" = 2'-4"

MAXIMUM CONTAINMENT VOLUMES:

[1] OVERALL BUILDING AREA
CONTAINMENT AREA = CONTAINED BUILDING AREA-LOADING DOCK PIT/TRUCK STATION-TRUCK RAMP/3-TANKS-DESIGNATED GCSA CONTAINERS
CONTAINMENT AREA = 78,425 - 4,500 - 45 - 3,010 = 39,868 SQ/FT
CONTAINMENT VOLUME = AREA X CURB HEIGHT X CONVERSION
= 39,868 X 0.33 X (7.48 GAL/CU.FT.) = 98,857 GAL. CAP.

[2] TRUCK STATION AREA (TANK TRUCK STATIONS NO. 1 & 2; CONTAINER TRUCK STATIONS NO. 1, 2 & 3)
CONTAINMENT VOLUME = AREA (CONTAINER TRUCK ST's #1, 2 & 3) X PIT DEPTH/2 X CONVERSION
= 3,010 X 3.67/2 X (7.48 GAL./CU.FT.) = 41,177 GAL. CAP.

[3] STORAGE TANK AREA
THIS AREA HAS TWELVE 14' DIA. VERTICAL CYLINDER STORAGE TANKS
DISPLACEMENT AREA DUE TO 11 TANKS = 11 X 3.14 (14')²/4 = 1,693 SQ/FT (FOOTPRINT)
CONTAINMENT AREA = (TANK FARM AREA - TANK FOOTPRINT AREA - EYE WASH STATION)
= (3,010 - 1,693 - 4) = 3,319 SQ/FT
CONTAINMENT AREA VOLUME = AREA X CURB HEIGHT X CONVERSION
= 3,319 X 2.33 X (7.48 GAL./CU.FT.) = 57,845 GAL. CAP.

NOTABLE FACTORS IMPACTING CONTAINMENT CAPACITY, INCLUDING ANCILLARY EQUIPMENT:
ADDITIONAL CAPACITY DUE TO 1" SLOPING FLOORS (PERIMETER)
= (L X W X H)/3 = (120' X 26' X 1/12')/3 = 130 CF
DISPLACEMENT DUE TO TANK SUPPORT STRUCTURES (12 EACH) (CONCRETE LESS STEEL GRID VOIDS):
= (48.1 CF - 22.3 CF) X 12 TANKS = 288 CF
DISPLACEMENT DUE TO PUMPS (6 EACH) + CONCRETE MOUNTS + 3.5" & 4.5" PIPING:
= 41 CF + 35 CF + 15 CF = 91 CF
DISPLACEMENT DUE TO COLUMN SUPPORTS + GIRDER RUPTURE CONTAINER
= 22.4 CF + 8.3 CF = 30 CF
FINAL ESTIMATED VOLUME = 57,845 GAL + (130 - 288 - 91 - 30) X 7.48 = 55,848 GAL. CAP.
ADDITIONAL CAPACITY BEYOND THAT REQ'D IS AVAILABLE FOR OTHER UNKNOWN STRUCTURES

[4] OUTER CONVEYOR AREA
CONTAINMENT VOLUME = OUTER CURBED AREA X CURB HEIGHT X CONVERSION
VOLUME = 20,950 X 0.33 X (7.48 GAL./CU.FT.) = 51,713 GAL. CAP.

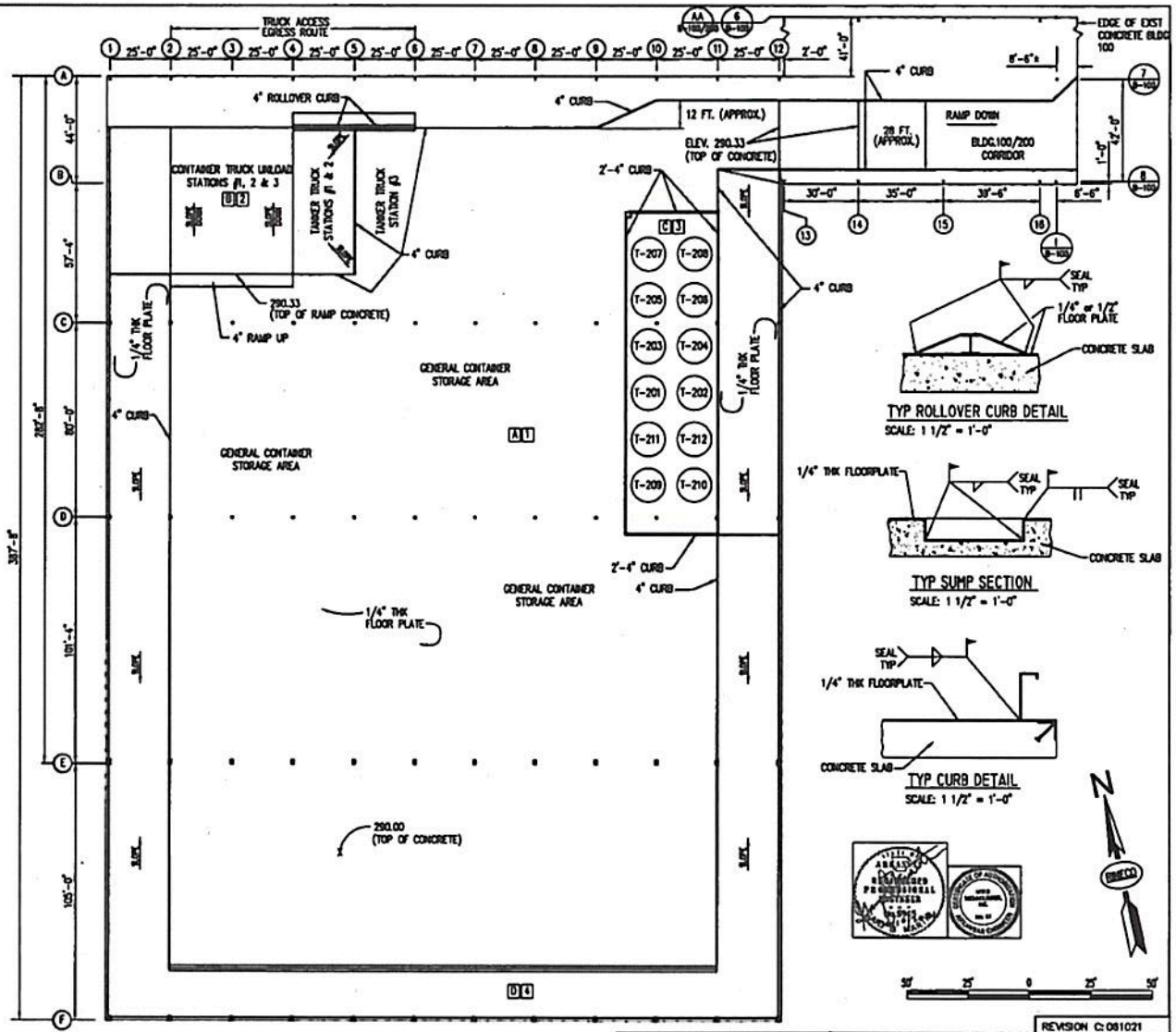
REQUIRED CONTAINMENT VOLUMES:
NOTE: AVAILABLE CAPACITIES ARE ADEQUATE FOR CONTAINING AN ALLOWANCE IN EXCEEDANCE OF 3,000 GAL. OF COLLECTED RAINWATER PRIOR TO REMOVAL FROM CONTAINMENT

TRUCK STATION AREA (TANK TRUCK STATIONS NO. 1 & 2 ; CONTAINER TRUCK STATIONS NO. 1, 2 & 3)
THESE STATIONS ARE WITHIN THE LOADING DOCK PIT AREA WHICH HAS 41,177 GAL. CAP.
REQUIREMENT: COMPLETE CONTAINMENT OF THE LARGEST TANK TRUCK
REQUIRED CONTAINMENT VOLUME = 7,000 GAL. MAX. < 41,177 GAL. CAP.

BULK STORAGE TANK AREA
THIS AREA IS WITHIN THE STORAGE TANKS AREA WHICH HAS 55,848 GAL. CAP.
REQUIREMENT: COMPLETE CONTAINMENT OF THE LARGEST TANK
REQUIRED CONTAINMENT VOLUME = 39,400 GAL. MAX. < 55,848 GAL. CAP.

GENERAL CONTAINER STORAGE AREA
THIS AREA IS WITHIN THE OVERALL BUILDING AREA WHICH HAS 98,857 GAL. CAP.
REQUIREMENT: CONTAIN 10% OF THE TOTAL VOLUME OF THE CONTAINERS STORED
TOTAL VOLUME OF CONTAINERS STORED, PEAK = 17,837 DRUMS OR 808,335 GAL. CAP. (PERMIT CAPACITY)
REQUIRED CONTAINMENT VOLUME = 80,834 GAL. MAX. < 98,857 GAL. CAP.
TANKER TRUCK CAPACITY OF 7,000 GAL. MAX. WILL COUNT AGAINST OTHER CONTAINERS WITHIN THE OVERALL GENERAL CONTAINER STORAGE AREA.

REQUIRED CONTAINMENT WITH INSTALLED CONVEYORS (RE: FIGURE 6C-2)
CONTAINERS ON CONVEYORS FOUND WITHIN OUTER CONTAINMENT AREA (EAST, WEST & SOUTH OF INNER BLDG. AREA) AND IN CONTAINED OVERHEAD CONVEYOR TO RECYCLING SYSTEM WILL BE CONTAINED WITHIN THE OUTER CONTAINMENT AREA.
MAXIMUM NUMBER OF CONTAINERS ON OUTER CONVEYORS = 1,500 DRUMS
MAXIMUM NUMBER OF CONTAINERS ON RECYCLING SYSTEM CONVEYOR (HEADING SOUTH) = 500 DRUMS
TOTAL VOLUME OF CONTAINERS WITHIN AREA, PEAK = 2,000 DRUMS OR 110,000 GAL. MAX.
TOTAL VOLUME REQUIRED FOR CONTAINMENT = 11,000 GAL. MAX. < 51,713 GAL. CAP.



TYP ROLLOVER CURB DETAIL
SCALE: 1 1/2" = 1'-0"

TYP SUMP SECTION
SCALE: 1 1/2" = 1'-0"

TYP CURB DETAIL
SCALE: 1 1/2" = 1'-0"

50' 25' 0 25' 50'

BLDG 200 STEEL CONTAINMENT PLAN
SCALE: 1" = 50'
CAFO Attachment B (Re: 46.c)

REVISION C: 081021

RINECO
BUILDING 200
SECONDARY CONTAINMENT CALCULATIONS
FIG. NO. 045

CONSENT AGREEMENT AND FINAL ORDER
Docket No. RCRA-06-2021-0943
ATTACHMENT C

CONSENT AGREEMENT AND FINAL ORDER
Docket No. RCRA-06-2021-0943
ATTACHMENT C

RINECO
A HERITAGE Company

HAZARDOUS WASTE MANAGEMENT FACILITY
HASKELL, ARKANSAS

OWNER OR OFFICER CERTIFICATION

Re: CAFO Provision 56

I certify under the penalty of law that Rineco Chemical Industries, LLC has complied with the Ordering (Compliance) provisions of this Consent Agreement. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date: July 21, 2021

Signature:

Title: V.P. of Operations - Benton