Clean Harbors Las Vegas

Application for
Permit to Operate a
Solid Waste Management Facility

Part 3

1. Business License: Attached
2. Business Entity Approval: Attached
3. Certificate of Occupancy: Attached
4. Air Control Approval: Attached
5. Fire Control Approvals/Permits: Attached
6. Discharge Approvals/Permits: Attached
7. Stormwater Pollution Prevention Plan (SWPPP): Attached
8. Spill Prevention, Control and Countermeasure (SPCC) Plan: Attached
9. NvOSHA Compliant Site Safety Plan: Not Applicable
10. Other Site-specific Approvals/Permits: Attached
BUSINESS LICENSE
NEVADA STATE BUSINESS LICENSE
CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

Nevada Business Identification # NV20021375471
Expiration Date: 07/31/2023

In accordance with Title 7 of Nevada Revised Statutes, pursuant to proper application duly filed and payment of appropriate prescribed fees, the above named is hereby granted a Nevada State Business License for business activities conducted within the State of Nevada. Valid until the expiration date listed unless suspended, revoked or cancelled in accordance with the provisions in Nevada Revised Statutes. License is not transferable and is not in lieu of any local business license, permit or registration. License must be cancelled on or before its expiration date if business activity ceases. Failure to do so will result in late fees or penalties which, by law, cannot be waived.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Great Seal of State, at my office on 06/16/2022.

BARBARA K. CEGAVSKE
Secretary of State
BUSINESS LICENSE
City of North Las Vegas
2250 Las Vegas Blvd. North, Suite 110
North Las Vegas, NV 89030

Mailing Address:
CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
42 LONGWATER DR
NORWELL, MA 02061

In conformity with and subject to the provisions of the Ordinances of the City of North Las Vegas and the laws of the State of Nevada, license is hereby granted to operate the business described hereon:

License Number: BL92227 Expiration Date: 04/30/2023
MJBL Number: 4092227000
Type of License: CONTRACTOR
Business Location: CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
4500 N WALNUT RD STE B
NORTH LAS VEGAS, NV 89031

Owner/Principal(s): CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

Licensee is also authorized to conduct business for this license type in the following non-primary jurisdiction(s):
HENDERSON
CLARK
LAS VEGAS

Marc Jordan
Director of Land Development & Community Services

This license is not transferable
POST IN A CONSPICUOUS PLACE

City of North Las Vegas
Your Community of Choice
BUSINESS ENTITY APPROVAL
## ENTITY INFORMATION

<table>
<thead>
<tr>
<th>Entity Name:</th>
<th>CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.</th>
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<tbody>
<tr>
<td>Entity Number:</td>
<td>C18226-2002</td>
</tr>
<tr>
<td>Entity Type:</td>
<td>Foreign Corporation (80)</td>
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<td>Entity Status:</td>
<td>Active</td>
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<td>Formation Date:</td>
<td>07/19/2002</td>
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<td>NV20021375471</td>
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<td>Termination Date:</td>
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<td>Annual Report Due Date:</td>
<td>7/31/2023</td>
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<td>Domicile Name:</td>
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<td>Jurisdiction:</td>
<td>Massachusetts</td>
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</table>
Name of Individual or Legal Entity:
C T CORPORATION SYSTEM

Status:
Active

CRA Agent Entity Type:

Registered Agent Type:
Commercial Registered Agent

NV Business ID:
NV20191497453

Office or Position:

Jurisdiction:
DELAWARE

Street Address:
701 S CARSON ST STE 200, Carson City, NV, 89701, USA

Mailing Address:

Individual with Authority to Act:
MATTHEW TAYLOR

Fictitious Website or Domain Name:

OFFICER INFORMATION

<table>
<thead>
<tr>
<th>Title</th>
<th>Name</th>
<th>Address</th>
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<th>Status</th>
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<tbody>
<tr>
<td>Secretary</td>
<td>DANIEL JANIS</td>
<td>ONE BOSTON PLACE, Boston, MA, 02108, USA</td>
<td>06/16/2022</td>
<td>Active</td>
</tr>
<tr>
<td>Other/</td>
<td>Michael MCDONALD</td>
<td>42 LONGWATER DRIVE, PO BOX 9149, NORWELL, MA, 02061, USA</td>
<td>07/09/2021</td>
<td>Active</td>
</tr>
<tr>
<td>President</td>
<td>ERIC GERSTENBERG</td>
<td>42 LONGWATER DR, NORWELL, MA, 02061, USA</td>
<td>06/03/2019</td>
<td>Active</td>
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<td>-----------------------</td>
<td>---------------------------------------------------</td>
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</tr>
<tr>
<td>Treasurer</td>
<td>GREGORY MALERBI</td>
<td>42 LONGWATER DR, NORWELL, MA, 02061, USA</td>
<td>06/03/2019</td>
<td>Active</td>
</tr>
<tr>
<td>Director</td>
<td>ERIC GERSTENBERG</td>
<td>42 LONGWATER DRIVE, NORWELL, MA, 02061, USA</td>
<td>06/03/2019</td>
<td>Active</td>
</tr>
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</table>

CURRENT SHARES

<table>
<thead>
<tr>
<th>Class/Series</th>
<th>Type</th>
<th>Share Number</th>
<th>Value</th>
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</thead>
</table>

No records to view.

- Unlimited Foreign Entities Only
- No Stock Foreign Entities Only

Number of No Par Value Shares:

12500

Total Authorized Capital:

12,500

Filing History   Name History   Mergers/Conversions
CERTIFICATE OF OCCUPANCY
CLARK COUNTY BUILDING DEPARTMENT
500 S. GRAND CENTRAL PARKWAY - LAS VEGAS, NEVADA 89155-3330 (702) 455-3300
CERTIFICATE OF COMPLETION

Permit #: 00-13680  Zone: M-B, M-1
Site Address: 4635 E COLTON AVE 340
Property Description: LAND DIVISION 42-89 LOT 2 890614:429

Project Name: NORTA LLC OFF WHSE
Tenant Name: NORTA LLC OFF WHSE Tenant #34C
Owner Name: NORTA LLC
Contractor Name: SUN DANCE BUILDERS LLC State Lic. #: 0048735
Contractor Address: 3645 OQUENDO ROAD SUITE 400 LAS VEGAS NV 89118

Chief Phone: (702) 788-1776 Parcel #: 140-08-401-003 No. of Units: 6
Primary Design Professional: JOHN BURKE
Construction Type: 3N Occupancy: B/S1
Occupant Load: 14400 Building Final: 5/15/01 Issue Date: 5/16/01
Sq. Ft. Application Type: OFFICE/WAREHOUSE-NEW

Description of Work: OFFICE/WAREHOUSE BUILDING- SHELL

NOTICE TO APPLICANT

This structure is deemed to be in substantial compliance with fire, life safety, and structural provisions of the adopted codes of construction. Records concerning the construction of this building are on file with the building department in compliance with the appropriate records procedures.

This Certificate must be posted and maintained within any non-single family building or structure referenced above. Any construction to be done beyond the final building inspection date, above, requires a new building permit.

5/16/01
DATE APPROVED ROBERT D. WEBER, DIRECTOR

This Certificate of Occupancy provides no warranty or guarantee either expressed or implied.
AIR CONTROL APPROVAL
CERTIFICATE OF EXEMPTION TO MINOR SOURCE PERMITTING

ISSUED TO: Clean Harbors Las Vegas
4435 East Colton Avenue
Suite 101
Las Vegas, Nevada 89115

SOURCE ID: 17064

SOURCE: Clean Harbors Las Vegas
4435 East Colton Avenue
Suite 101
Las Vegas, Nevada 89115

The Clark County Department of Environment and Sustainability, Division of Air Quality (DAQ) has received an application for the subject source. DAQ has determined the source’s potential to emit (PTE) regulated air pollutants does not exceed the applicability threshold; the source does not need to obtain a minor source permit under Section 12.1 of the Clark County Air Quality Regulations (AQRs) if all emission units and activities emitting regulated air pollutants at the source conform to this certificate.

Table 1 lists the units and activities emitting regulated air pollutants at this exempt stationary source.

**Table 1. Summary of Units and Activities Emitting Regulated Air Pollutants**

<table>
<thead>
<tr>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aboveground Wastewater Storage Tanks (2) – 18,430 gallons</td>
</tr>
</tbody>
</table>
The PTE calculated for this exempt stationary source is based on the emission units and activities listed in Table 1. Table 2 summarizes the applicability emissions of all regulated air pollutants from this source that are relevant to applicability determinations.

### Table 2. Permit Applicability Thresholds and Applicability Emissions (Tons/Year)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>NO$_x$</th>
<th>CO</th>
<th>SO$_2$</th>
<th>VOC</th>
<th>H$_2$S</th>
<th>Lead</th>
</tr>
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<tbody>
<tr>
<td>Permit Applicability Thresholds</td>
<td>5</td>
<td>5</td>
<td>5</td>
<td>25</td>
<td>25</td>
<td>5</td>
<td>1</td>
<td>0.30</td>
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<tr>
<td>Source Applicability Emissions</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.04</td>
<td>0</td>
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</table>

Pursuant to AQR 26, no person shall cause, suffer, or permit any emission unit to discharge any air contaminant above an average 20% opacity for more than six consecutive minutes. Pursuant to AQRs 40 and 43, no person shall cause, suffer, or allow the source to discharge air contaminants (or other material) in quantities that will cause a nuisance, including excessive odors. However, no federal regulation has been identified for this source. The emission units and activities identified in this document may be subject to other state or local air quality regulations.

The owner/operator must keep records on site that demonstrate the PTE to retain the exempt status of this certificate. These records must be made available to the Control Officer upon request within a reasonable time frame.

Any changes to the units and/or activities emitting regulated air pollutants will invalidate this certificate. Before exceeding the permit applicability thresholds for a minor stationary source, the owner/operator of this source must apply for and receive a permit for a stationary source pursuant to AQR 12.1.

DAQ has a program (SBAP) to assist small business owners and operators with permitting and compliance matters. If you have any questions, or require any further assistance, please contact DAQ at (702) 455-5942.

**Issued By:**  
Clark County Department of Environment and Sustainability  
Division of Air Quality

Theodore A. Lendis, Permitting Manager  
December 13, 2022  
Date
FIRE CONTROL APPROVALS/PERMITS
Annual Operational PERMIT

PERMIT NUMBER: FP21-02342
SITE ADDRESS: 4435 E COLTON AVE
PARCEL NUMBER: 140-08-401-016
BUSINESS NAME: CLEAN HARBORS ENVIRONMENTAL SERVICES
PROPERTY OWNER: KOBOLD CONSTRUCTION G P
PERMIT TYPE: Hazardous Materials

Sub Venue/Location: Hazardous Materials -

Conditions of Approval:
Plans approved for the storage of 44,000 lbs of flammable solids. The 5% oil in water likely has no fire point and by definition is excluded from permitting. This approval is only a plan review acceptance. Final approval and issuance of a permit will be based upon successful completion of a fire inspection. Refer to approved plans for possible additional requirements.

ANNUAL OPERATIONAL PERMIT EXPIRATION / RENEWAL DATE: 6/30/2023

Customer is responsible for ensuring the renewal of said Permit 30 days prior to expiration. A renewal notice will be emailed to the contacts provided within the existing operational permit record. Operational permit renewals may be processed online by following the instructions provided on the Clark County Building and Fire Prevention website www.ClarkCountyNV.gov/Building. All customer inquiries should be sent to Permits@ClarkCountyNV.gov. If payment is not received by the due date listed above, a $90 late fee will be assessed for each 30 day period past the expiration date.

Inspector approval is required to perform the operation as described in the approved permit conditions.

Terry Steelsmith 11/23/2022

**Approved Permit Must Be Kept On Premises**
NEVADA STATE FIRE MARSHAL
Hazardous Materials Permit

PERMIT NUMBER
CLEAN HARBORS ENV SVC, INC
1500 East Villa Street
Elgin, Illinois 60120

FDID NUMBER
03050

Clean Harbors Environmental Services
4435 E Colton Ave Suite 101,
Las Vegas, Nevada 89115

2022
Expires February 28, 2023

Nevada State Fire Marshal

THIS PERMIT DOES NOT MEET LOCAL FEE REQUIREMENTS * PLEASE KEEP PERMIT AVAILABLE ON SITE
CHANGES IN INFORMATION OR MATERIALS SHALL BE REPORTED WITHIN 90 DAYS
DISCHARGE APPROVALS/PERMITS
Re: Stormwater Industrial (Multi-Sector) Permit NVR050000
Site ID: ISW-81831
Project Name: Clean Harbors Environmental Services Inc

Date: 1/24/2023

Owner: Clean Harbors
William Roberts
42 Longwater Drive
Norwell MA 83716
Renew NO

Operator: Clean Harbors Environmental Inc
William Roberts
4435 East Colton Ave
Las Vegas MA 89119

* If this is a Renewal Application, NO filing fee is required.

Submission of this Electronic Notice of Intent constitutes notice that the Permittee identified in this request intends to be authorized by a permit issued by the State of Nevada and has or will comply with the following:

1. The Permittee will comply with all applicable permit conditions,
2. The Permittee understands that implementation of all controls required under by a General Permit will begin at the time the permittee commences work on the project identified in this application;
3. The Permittee understands that failure to submit the required $200.00 fee and this signed Certification Page within 30 days of the electronic submittal will result in failure for eligible coverage under the General Permit; and,
4. That Nevada Administrative Code (NAC) 445A requires that a Permittee (discharger) who is covered under a general permit shall pay to the Director/Division an annual services fee on or before July 1 of each year that the discharger is covered under that permit; and,
5. To terminate coverage of a General Permit, the Permittee must submit a Notice of Termination ("NOT") form when their facility no longer has any discharges associated with the site identified in this application for General Permit coverage.

Please mail the filing fee of $200.00 along with this notice to:
Bureau of Water Pollution Control
Nevada Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, NV 89701-5249

For General Stormwater questions, please call 775-687-9442.
For questions regarding other general permits please call 775-687-9492.

Project located in whole or in part on tribal lands: No

NOI Certification Statement

"I hereby certify that I am familiar with the information contained in the application and that to the best of my knowledge and ability such information is true, complete, and accurate."

Owner or Operator Name (Please Print):
William Roberts

Signature (Please use a Non-Black Ink Color):

Any person who knowingly makes any false statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained by the provisions of Nevada Administrative Code (NAC) 445A, or by any permit, rule, regulation, or order issued pursuant thereto, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under the provisions of Nevada Administrative Code (NAC) 445A, inclusive, or by any permit, rule, regulation, or order issued pursuant thereto, is guilty of a gross misdemeanor and shall be punished by a fine of not more than $10,000 or by imprisonment in the county jail for not more than 1 year, or by both fine and imprisonment.

Attached File: N/A
Keep The Below Entered Information As Your Record

*(New Permit: ISW-51831)*

*****************************************************************************

**General Permit Questions**

*****************************************************************************

1. Does the facility dispose of wastewater or have a wastewater application? - **No**
2. Does the facility store material or products outside in an exposed area? - **Yes**
3. Does the facility load, unload and/or transport material or products in an exposed area? - **Yes**
4. Does the facility have material handling equipment stored or used in an exposed area? - **Yes**
5. Does the facility store, keep materials or products in open, deteriorated or leaking storage drums, barrels, tanks, and/or similar containers in an exposed area? - **No**
6. Does the facility store or house materials or products of past industrial activity in an exposed area? - **No**
7. Does the facility have waste material stored or kept in an exposed area? - **No**
8. Does the facility use, store, or clean industrial machinery or equipment in an area where residuals from machinery or equipment remain in an exposed area? - **No**
9. Does the facility have materials or residuals (including spills/leaks) on the ground? - **No**
10. Does the facility handle or store material or products on roadways or railways owned or maintained by the discharger? - **No**
11. Does the facility have particulate matter or visible deposits of residuals from roof stacks and/or vents that could be evident in storm water outflow? - **No**
Section 1

Facility / Site Information

Site Name: Clean Harbors Environmental Services Inc
Address Line 1: 4435 East Colton Avenue
Address Line 2: 
City / State / Zipcode: Las Vegas, NV 89119
Contact Name (Phone #): Mr. William Roberts (702)396-4148
Email: roberts.william@cleanharbors.com
Name of Receiving Water and /or Description of Discharge Location: Clark County Reclamation
Frequency of Discharge: Unlikely
Estimated Flow in Gallons: 0
Estimated Begin - End Date: 01/25/2023 - 06/19/2024

SWPPP Information

Address Line 1: 4435 East Colton Avenue
Address Line 2: 
City / State / Zipcode: Las Vegas, NV 89119
Contact Name (Phone #): Mr. William Roberts (702)396-4148

Location / GIS Information

Assessor's Parcel Number (APN): 14008401016
Standard Industrial Classification (SIC) Code: 3291 - Abrasive Products
County(ies): Clark

Section 2, 3 And 4

Owner Name and Address

Is the Owner the Permittee? - NO
Owner Name: Clean Harbors
Address Line 1: 42 Longwater Drive
Address Line 2: 
City / State / Zipcode: Norwell, MA 02362
Contact Name: Mr. William Roberts
Contact Phone #: 702-758-6019
Taxpayer ID (TIN): 042698999
Legal Status: Public (Other than Federal)

Operator Name and Address

Is the Operator the Permittee? - YES
Operator Name: Clean Harbors Environmental Inc
Address Line 1: 4435 East Colton Ave
Address Line 2: 
City / State / Zipcode: Las Vegas, MA 89119
Contact Name: Mr. William Roberts
Contact Phone #: 702-396-4144
Taxpayer ID (TIN): 042698999
Legal Status: Public (Other than Federal)

Billing/Invoicing

Send Annual Billing/Invoicing Information to: Operator

Attachments

Attached File Name: N/A

Section 5

Additional / Consultant Contact Information (Optional)

<table>
<thead>
<tr>
<th>Company/Name</th>
<th>Address 1</th>
<th>Address 2</th>
<th>City</th>
<th>State</th>
<th>Zip</th>
<th>Title</th>
<th>First Name</th>
<th>Last Name</th>
<th>Contact Phone</th>
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<tbody>
<tr>
<td>Broadbent</td>
<td>8 W Pacific Ave.</td>
<td>Henderson</td>
<td>NV</td>
<td>89015</td>
<td>Ms.</td>
<td>Taylor</td>
<td>Musarra</td>
<td>7024997321</td>
<td></td>
</tr>
<tr>
<td>Broadbent</td>
<td>8 W Pacific Ave.</td>
<td>Henderson</td>
<td>NV</td>
<td>89015</td>
<td>Mr.</td>
<td>Chris</td>
<td>Carrier</td>
<td>7025630600</td>
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</tbody>
</table>
Stormwater Pollution Prevention Plan

for:

Clean Harbors Environmental Services Inc.
4435 E Colton Ave, Suite 101
Las Vegas, NV 89115
702-396-4148

SWPPP Contact(s):

Las Vegas Office
William Roberts
4435 E Colton Ave, Suite 101
Las Vegas, NV 89115
702-758-6019
roberts.william@cleanharbors.com

SWPPP Preparation Date:

10/22/2022
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SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION.

1.1 Facility Information.

Instructions:
- You will need the information from this section to complete your NOI.
- You must include a copy of the 2019 MSGP, a signed copy of your NOI, and your approval letter in Attachment C of your SWPPP.

Facility Information
Name of Facility: Clean Harbors Environmental Services, Inc.
Street: 4435 E. Colton Ave, Suite 101
City: Las Vegas State: NV ZIP Code: 89115
County or Similar Subdivision: Clark
NPDES ID (i.e., permit tracking number): ISW-11440 (if covered under a previous permit)
Primary Industrial Activity SIC code 3291
Sector (2019 MSGP, Appendix B and Section 9): Sector P – Land Transportation and Warehousing

Co-located Industrial Activity(s) SIC code(s)
Co-located Sector(s) (2019 MSGP, Appendix B and Section 9):

Latitude/Longitude
Latitude: 36.27861 ° N (decimal degrees)
Longitude: 115.2472 ° W (decimal degrees)

Method for determining latitude/longitude (check one):
☐ USGS topographic map (specify scale: __________ ) ☐ GPS
☐ Other (please specify): Google Earth
Estimated area of industrial activity at site exposed to stormwater: 2 (acres)

**Discharge Information**

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)?  ☑ Yes  ☐ No

If yes, name of MS4 operator: Las Vegas

Name(s) of surface water(s) that receive stormwater from your facility:

Does this facility discharge industrial stormwater directly into any segment of an "impaired water" (see definition in 2019 MSGP, Appendix A)?  ☐ Yes  ☑ No

If Yes, identify name of the impaired water(s) (and segment(s), if applicable):

Identify the pollutant(s) causing the impairment(s):

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? If yes, please list the TMDL pollutants:

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2019 MSGP Table 1-1)?  ☐ Yes  ☑ No

If Yes, which guidelines apply?
1.2 **Contact Information/Responsible Parties.**

**Instructions:**
- List the facility operator(s), facility owner and SWPPP contact(s). Indicate respective responsibilities, where appropriate.
- You will need the information from this section of the SWPPP Template for your NOI.

**Facility Operator(s):**
Name: William Roberts  
Address: 4435 E. Colton Ave.  
City, State, Zip Code: Las Vegas, NV 89115  
Telephone Number: 702-396-4148  
Email address: Roberts.William@cleanharbors.com  
Fax number: 702-643-8635

*(repeat for multiple operators by copying and pasting the above rows)*

**Facility Owner(s):**
Name: Clean Harbors Environmental Services, Inc.  
Address: 42 Longwater Drive  
City, State, Zip Code: Norwell, MA 02061  
Telephone Number: 781-792-5165  
Email address: connorsw@cleanharbors.com  
Fax number: 781-792-5915

*(repeat for multiple operators by copying and pasting the above rows)*

**SWPPP Contact(s):**
SWPPP Contact Name (Primary): William Roberts  
Telephone number: 702-396-4148  
Email address: Roberts.William@cleanharbors.com  
Fax number: 702-643-8635

SWPPP Contact Name (Backup): Sam Barket  
Telephone number: 323-303-7927  
Email address: samuel.barket@safety-kleen.com  
Fax number: 323-303-7927
1.3 Stormwater Pollution Prevention Team.

Instructions (see 2019 MSGP Section 6.2.1):

The stormwater pollution prevention team is responsible for overseeing development of and any modifications to the SWPPP, implementing and maintaining control measures/BMPs, and taking corrective actions when required. Each member of the stormwater pollution prevention team must have ready access to the 2019 MSGP, the most updated copy of the facility SWPPP, and other relevant documents.

- Identify the staff members (by name and/or title) that comprise the facility's stormwater pollution prevention team as well as their individual responsibilities.
- The Division recommends, but does not require, the stormwater pollution prevention team include at least one individual from each shift to ensure that there is always a stormwater pollution prevention team member on-site.

<table>
<thead>
<tr>
<th>Staff Names</th>
<th>Individual Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Will Roberts</td>
<td>Safety and Operational Compliance, proper notification to NDEP, management of reportable releases. Overall responsibility that proper measures are being taken to ensure proper control measures and appropriate prevention measures are taken.</td>
</tr>
<tr>
<td>Sam Barket</td>
<td>Operational Compliance</td>
</tr>
</tbody>
</table>

1.4 Site Description.

Instructions (see 2019 MSGP Section 6.2.2):

Provide a general description of the "industrial activities" conducted at your facility. For the MSGP industrial activities consist of: manufacturing and processing; material handling activities including storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, by-product or waste product; and vehicle and equipment fueling, maintenance and cleaning.

Industrial activities may occur at any of the following areas (list not exhaustive): industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater.

The Division recommends that you differentiate activities that occur indoors from those that occur outdoors and could be exposed to stormwater, or under cover but that could be exposed to run-on. Don't overlook processes that are vented and may contribute pollutants to the roof.

CHESI is a transfer facility that collects and transports hazardous and non-hazardous waste to proper disposal facilities. No hazardous waste is stored on the premises for more than 10 days at any given time. Bulk oil/water is stored on the property.
1.5 General Location Map.

Instructions (see 2019 MSGP Section 6.2.2.2):
Provide a general location map (e.g., U.S. Geological Survey (USGS) quadrangle map or aerial image from the internet) with enough detail to identify the location of your facility and all receiving waters for your stormwater discharges (include as Attachment A of this SWPPP Template).

The general location map for this facility can be found in Attachment A.
1.6 Site Map.

Instructions (see 2019 MSGP Section 6.2.2.3):
Prepare a site map showing the following information. The site map will be included as Attachment B of the finished SWPPP.

- Boundaries of the property and the size of the property in acres;
- Location and extent of significant structures and impervious surfaces;
- Directions of stormwater flow (use arrows);
- Locations of all stormwater control measures;
- Locations of all receiving waters, including wetlands, in the immediate vicinity of your facility. Indicate which waterbodies are listed as impaired and which are identified by your state or EPA;
- Locations of all stormwater conveyances including ditches, pipes and swales;
- Locations of potential pollutant sources identified under Section 6.2.3.2;
- Locations where significant spills or leaks identified under Section 6.2.3.3 have occurred;
- Locations of all stormwater monitoring points;
- Locations of stormwater inlets and discharge points, with a unique identification code for each discharge point (e.g., Discharge points 001, 002), indicating if you are treating one or more discharge points as "substantially identical" under Sections 4.8.4, 6.2.6, and 7.1.2, and an approximate outline of the areas draining to each discharge point;
- If applicable, MS4s and where your stormwater discharges to them;
- Locations of the following activities where such activities are exposed to precipitation:
  - fueling stations;
  - vehicle and equipment maintenance and/or cleaning areas;
  - loading/unloading areas;
  - locations used for the treatment, storage or disposal of wastes;
  - liquid storage tanks;
  - processing and storage areas;
  - immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
  - transfer areas for substances in bulk;
  - machinery; and
  - locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants.

The site map for this facility can be found in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES.
Section 2 will describe all areas at your facility where industrial materials or activities are exposed to stormwater or from which allowable non-stormwater discharges originate. Industrial materials or activities
include, but are not limited to: material handling equipment or activities; industrial machinery; raw materials; industrial production and processes; and intermediate products, by-products, final products, and waste products. Material handling activities include, but are not limited to: the storage, loading and unloading, transportation, disposal or conveyance of any raw material, intermediate product, final product or waste product. For structures located in areas of industrial activity, you must be aware that the structures themselves are potential sources of pollutants. This could occur, for example, when metals such as aluminum or copper are leached from the structures as a result of acid rain.

For each area identified, the SWPPP must include industrial activities, potential pollutants, spills and leaks, unauthorized non-stormwater discharges, salt storage, stormwater sampling data and descriptions of control measures.

2.1 Potential Pollutants Associated with Industrial Activity.

Instructions (see 2019 MSGP Sections 6.2.3.1 and 6.2.3.2):

For the industrial activities identified in section 1.4 above, list the potential pollutants or pollutant constituents (e.g., motor oil, fuel, battery acid, and cleaning solvents).

In your list of pollutants associated with your industrial activities, include all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the three years prior to the date you prepare your SWPPP.

<table>
<thead>
<tr>
<th>Industrial Activity</th>
<th>Associated Pollutants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Cleaning</td>
<td>Dirt and Road Grime</td>
</tr>
<tr>
<td>Vehicle Maintenance</td>
<td>Motor Oil, Battery Acid/Engine Coolant</td>
</tr>
<tr>
<td>Material Storage</td>
<td>Oil/Sludge</td>
</tr>
<tr>
<td>Drums Storage in containment</td>
<td>Regulated and Non-Regulated Constituents</td>
</tr>
</tbody>
</table>

2.2 Spills and Leaks.

Instructions (See 2019 MSGP Section 6.2.3.3):

Include the following in this section:

- **Potential spills and leaks**: A description of where potential spills and leaks could occur at your site that could contribute pollutants to your stormwater discharge, and specify which discharge points are likely to be affected by such spills and leaks.

- **Past spills and leaks**: A description of significant spills and leaks in the past three years of oil or toxic or hazardous substances that actually occurred at exposed areas, or that drained to a stormwater conveyance.

Note: Significant spills and leaks include, but are not limited to, releases of oil or hazardous substances in excess of quantities that are reportable under CWA Section 311 (see 40 CFR 110.6 and 40 CFR 117.21) or Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC §9602.

Areas of Site Where Potential Spills/Leaks Could Occur

<table>
<thead>
<tr>
<th>Location</th>
<th>Discharge Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment Parking Lot</td>
<td>No outfalls impacted</td>
</tr>
</tbody>
</table>

Revision 3
The Division MSGP SWPPP Template, 2019
Description of Past Spills/Leaks

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Discharge Points</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NO SPILLS HAVE OCCURRED AT THIS FACILITY</td>
<td></td>
</tr>
</tbody>
</table>

2.3 Unauthorized Non-stormwater Discharges Documentation.

Instructions (see 2019 MSGP Section 6.2.3.4):
Section 1.2.2 of the 2019 MSGP identifies allowable non-stormwater discharges. The questions below require you to provide documentation of the following:
- Evaluation for the presence of unauthorized non-stormwater discharges at your site; and
- Elimination of any unauthorized non-stormwater discharges.

Description of this facility’s unauthorized non-stormwater discharge evaluation:
- Date of evaluation: April 20, 2012
- Description of the evaluation criteria used: Clark County Water Reclamation came onsite to conduct the evaluation. The findings included that no stormwater locations are impacted by the associated operations onsite.
- List of the drainage points that were directly observed during the evaluation: There are two (2) possible drainage points located on either side (east and west sides) of the property that would not be impacted from any non-waste water discharges.
- Action(s) taken: There are secondary containment berms located in the southern central portion of the property containing two (2) 18,400 gal. double-walled frac tanks that will not impact the stormwater system. There is no vehicle washing conducted onsite. There are no drains located in the repair shop. All incidental leaks and spills will be absorbed and disposed of appropriately.

2.4 Salt Storage.

Instructions (see 2019 MSGP Section 6.2.3.5):
Document the location of any storage piles containing salt used for deicing or other commercial or industrial purposes.

Note: you will be asked additional questions concerning salt storage in Section 3.1.7 of this SWPPP template, below.

There are no salt storage piles or buildings containing salt on the property.

2.5 Sampling Data Summary.

Instructions (See 2019 MSGP Section 6.2.3.6):
Summarize all stormwater sampling data collected from your permitted discharge points during the previous permit term. Include a narrative description that summarizes the collected data to support identification of potential pollution sources. Note that data tables and/or figures may be used to aid the summary.

No data was collected for the previous permit term.
SECTION 3: STORMWATER CONTROL MEASURES.

Instructions (See 2019 MSGP Sections 3.2, 3.3, 3.4, 9, and 6.2.4):
In Sections 3.1 - 3.4 of this SWPPP template, you are asked to describe the stormwater control measures that you have installed at your site to meet each of the permit's
- Control measure selection and design considerations in Section 3.2;
- Applicable numeric effluent limitations guidelines-based limits in Section 3.3 and Section 9;
- Water quality-based effluent limits in Section 3.4;
- Applicable effluent limits in Section 9.

In addition to your control measure descriptions, include explanations of how the controls fulfill the following requirements (see 2019 MSGP Section 3.2):
- The selection and design considerations; and
- How they address the pollutant sources identified in section 2.1 of the Template.

3.1 Control Measure Selection and Design Considerations

You must comply with the following non-numeric effluent limits as well as any sector-specific non-numeric effluent limits in Section 9.

3.1.1 Minimize Exposure.

Instructions (see 2019 MSGP Section 3.2.2):
Describe any structural controls or practices used to minimize the exposure of industrial activities to rain, snow, snowmelt and runoff. Describe where the controls or practices are being implemented at your site.

All bulk storage tanks are in secondary containment and all transportation bins are in curb containments. The facility acts under an approved SPCC plan which is kept onsite. The bulk storage tanks secondary containments are located on the southern central portion of the property. There are no stormwater drains located in conjunction to this operation.

3.1.2 Good Housekeeping.

Instructions (see 2019 MSGP Sections 3.2.3 and 6.2.5.1.1):
Describe any practices you are implementing to keep exposed areas of your site clean. Describe where each practice is being implemented at your site. Include here your schedule for: (1) regular pickup and disposal of waste materials, and (2) routine inspections for leaks and of the condition of drums, tanks and containers. Note: There are specific requirements for facilities that handle pre-production plastic.

All exposed areas of this facility are policed daily along with a crew that is responsible for the property weekly. This crew is responsible for adhering to the SPCC which covers the routine inspections of the storage tanks. Due to the surrounding property wall the facility has minimal debris on the property. All drums and containers are in curb containment and are kept free of debris.
3.1.3 Maintenance.

Instructions (see 2019 MSGP Sections 3.2.4 and 6.2.5.1.2):

Describe preventative maintenance procedures, including regular inspections, testing, maintenance and repair of all control measures to avoid situations that may result in leaks, spills, and other releases, and any back-up practices in place should a runoff event occur while a control measure is off-line. Include the schedule or frequency for maintaining all control measures. Describe where each applicable procedure is being implemented at the site.

Structural controls have been implemented on the property to ensure that there is no release into the storm water/sewer system including secondary containment, BMP’s and position of storage containers reducing the chance of a release.

3.1.4 Spill Prevention and Response.

Instructions (see 2019 MSGP Sections 3.2.5 and 6.2.5.1.3):

Describe any structural controls or procedures used to minimize the potential for leaks, spills and other releases. You must implement the following at a minimum:

- Plainly label containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides”) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;
- Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas;
- Develop training and train all staff on procedures to quickly stop, contain and clean up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible;
- Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made; and
- Notify appropriate facility personnel when a leak, spill or other release occurs.
- Specify cleanup equipment, procedures, and spill logs.

Describe where each control is to be located or where applicable procedures will be implemented.

Note: some facilities may be required to develop a Spill Prevention Control and Counterméasure (SPCC) plan under a separate regulatory program (40 CFR 112). If you are required to develop an SPCC plan, or you already have one, you should include references to the relevant requirements from your plan.

The Division recommends you include:

Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302 occurs during a 24-hour period, you must notify the National Response Center (NRC) at (800) 424-8802 and the Division at (888) 331-6337 as soon as you have knowledge of the discharge. If a spill involves any amount of a hazardous substance released to surface water or threatens a vulnerable source as defined by NAC 445A.3459 you must notify the Division at (888) 331-6337 as soon as you have knowledge of the discharge. If the spill is released to the soil or other surfaces of land in a quantity greater than 25 gallons or 200 pounds; is discovered in at least 3 cubic yards of soil during any subsurface excavations; is discovered in or on ground water; or there is a confirmed release from an underground storage tank the Division must be contacted within one working day at (888) 331-6337 or https://nevadaenvironmentalactivities.ndep.nv.gov/Spill/ReportForm.aspx.
CHESI is owned and operated by Clean Harbors which is an environmental response company. The company has the ability to respond to any release on the property limiting the time that a release would have entering the storm water system. CHESI has taken numerous actions to prevent a release, including but not limited to, secondary containments and proper storage of onsite chemicals and waste.

3.1.5 Erosion and Sediment Controls.

Instructions (see 2019 MSGP Sections 3.2.6 and 6.2.5.1.4):
Describe activities and processes for stabilizing exposed soils to minimize erosion. Describe flow velocity dissipation devices placed at all discharge locations and all structural and non-structural control measures to prevent the discharge of sediment. If applicable, describe the type and purpose of any polymers and/or chemical treatments used to control erosion and the location at your site where each control is implemented.

The facility does not have any erosion/sediment issues. Therefore, no controls have been enacted.

3.1.6 Management of Runoff.

Instructions (See 2019 MSGP Section 3.2.7):
Describe controls used at your site to divert, infiltrate, reuse, contain or otherwise reduce stormwater runoff. Describe the location at your site where each control is implemented.

The site’s secondary containment at the site has plugs in order to control discharge.

3.1.7 Salt Storage Piles or Piles Containing Salt.

Instructions (see 2019 MSGP Section 3.2.8):
If applicable, describe structures at your site that either cover or enclose salt storage piles or piles containing salt, and any controls that minimize or prevent the discharge of stormwater from such piles. Also, describe any controls or procedures used to minimize exposure resulting from adding to or removing materials from the pile. Describe the location at your site where each control and/or procedure is implemented.

There are no salt storage piles or buildings containing salt on the property.

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials.

Instructions (see 2019 MSGP Section 3.2.11):
Describe controls and procedures that will be used at your site to minimize generation of dust and off-site tracking of raw, final or waste materials in order to minimize pollutant discharges.

CHESI has installed asphalt on the property to control dust generation. It is a scheduled responsibility to keep this area free of dirt and limiting the vehicles tracking industrial material off sight and possibly into the stormwater/sewer system,
3.2 Sector-Specific Non-Numeric Effluent Limits.

Instructions (see 2019 MSGP Section 9):
Describe any controls or procedures that will be used at your site to comply with any sector-specific requirements that apply to you in Section 9 of the 2019 MSGP. Describe the location at your site where each control and/or procedure will be implemented.


All additional SWPPP requirements specified in Sector P – Land Transportation and Warehousing have already been included in the SWPPP.

3.3 Numeric Effluent Limitations Based on Effluent Limitations Guidelines.

Instructions (see 2019 MSGP Section 3.3):
If you are in an industrial category subject to one of the effluent limitations guidelines identified in the table below, describe controls or procedures that will be implemented at your site to meet these effluent limitations guidelines.

<table>
<thead>
<tr>
<th>Regulated Activity</th>
<th>40 CFR Part/Subpart</th>
<th>Effluent Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas</td>
<td>Part 429, Subpart I</td>
<td>See Section 9.2.4</td>
</tr>
<tr>
<td>Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)</td>
<td>Part 418, Subpart A</td>
<td>See Section 9.2.4</td>
</tr>
<tr>
<td>Runoff from asphalt emulsion facilities</td>
<td>Part 443, Subpart A</td>
<td>See Section 9.5.2</td>
</tr>
<tr>
<td>Runoff from material storage piles at cement manufacturing facilities</td>
<td>Part 411, Subpart C</td>
<td>See Section 9.6.3</td>
</tr>
<tr>
<td>Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities</td>
<td>Part 436, Subparts B, C, or D</td>
<td>See Section 9.9.11</td>
</tr>
<tr>
<td>Runoff from hazardous waste landfills</td>
<td>Part 445, Subpart A</td>
<td>See Section 9.10.2</td>
</tr>
<tr>
<td>Runoff from non-hazardous waste landfills</td>
<td>Part 445, Subpart B</td>
<td>See Section 9.11.7</td>
</tr>
<tr>
<td>Runoff from coal storage piles at steam electric generating facilities</td>
<td>Part 423</td>
<td>See Section 9.14.6</td>
</tr>
<tr>
<td>Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures</td>
<td>Part 449</td>
<td>See Section 9.18.7</td>
</tr>
</tbody>
</table>

The ELGs do not apply to CHESI.
3.4 Water Quality-based Effluent Limitations and Water Quality Standards.

Instructions (see 2019 MSGP Section 3.4):

Describe the measures that will be implemented at your site to control industrial stormwater discharge as necessary to meet applicable water quality standards of all affected states (i.e., your discharge must not cause or contribute to an exceedance of applicable water quality standards in any affected state).

The Division expects that compliance with the conditions in this permit will control discharges as necessary to meet applicable water quality standards. If at any time you become aware, or The Division determines, that your discharge does not meet applicable water quality standards, you must take corrective action(s) as required in Section 5.1 of the 2019 MSGP and document the corrective actions as required in Section 5.4 of the 2019 MSGP.

The Division may also require that you undertake additional control measures (to meet the narrative water quality-based effluent limit above) on a site-specific basis, or require you to obtain coverage under an individual permit, if information in your NOI, required reports, or from other sources indicates that your discharges are not controlled as necessary to meet applicable water quality standards. You must implement all measures necessary to be consistent with an available wasteload allocation in a Division established or approved TMDL.

CHESI has the ability to control all runoff from the site. The site slopes back to the concrete wall, so not runoff goes out the gates.
SECTION 4: SCHEDULES AND PROCEDURES.

4.1 Employee Training.

Instructions (see 2019 MSGP Sections 3.2.9 and 6.2.5.1.5):
Provide the elements of your training plan, including:

- The content of the training;
- The frequency/schedule of training for employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of the permit.

The following personnel, at a minimum, must receive training, and therefore should be listed out individually in the table below:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges;
- Personnel who are responsible for conducting and documenting monitoring and inspections as required in Sections 4 and 7; and
- Personnel who are responsible for taking and documenting corrective actions as required in Section 5.

2019 MSGP Section 3.2.9 requires that the personnel who are required to be trained must also be trained to understand the following if related to the scope of their job duties (e.g., only personnel responsible for conducting inspections need to understand how to conduct inspections):

- An overview of what is in the SWPPP;
- Spill response procedures, good housekeeping, maintenance requirements, and material management practices;
- The location of all controls on the site required by this permit, and how they are to be maintained;

CHESI is responsible for properly instructing the necessary employees in the operation and maintenance of equipment to prevent a discharge and able to follow the SPCC plan.

CHESI shall schedule and conduct spill prevention briefings for the necessary personnel at intervals frequent enough to maintain knowledge and skills adequate to execute the provisions of the SPCC plan. The briefings shall review actual events that occurred on this site, equipment failures or malfunctions and any newly adopted preventative measures. All new hires shall be trained on the provisions of the SPCC plan. Once a year, refresher training shall be conducted. A sign-in sheet or electronic documentation shall be maintained for each training session.
4.2 Inspections and Assessments.

Instructions (see 2019 MSGP Section 4):
Document procedures for performing the types of inspections specified by this permit, including:

- Routine facility inspections (see Section 4.1) and;
- Quarterly visual assessment of stormwater discharges (see Section 4.5).

Note: If you are invoking the exception for inactive and unstaffed sites proceed to 4.6.3 below.

4.2.1 Routine Facility Inspections.

Instructions (see 2019 MSGP Section 4.1):
Describe the procedures you will follow for conducting routine facility inspections in accordance with Section 4.1 of the 2019 MSGP. Document any findings of your facility inspections and maintain this report with your SWPPP as required in Section 6.6 of the 2019 MSGP. Summarize your findings in the annual report per Section 8.2 of the 2019 MSGP. Any corrective action required as a result of a routine facility inspection must be performed consistent with Section 5 of the 2019 MSGP.

For routine facility inspections to be performed at your site, your SWPPP must include a description of the following:

1. **Person(s) or positions of person(s) responsible for inspection.** General Manager, Facility Operations Supervisor

   *Note: Inspections must be performed by qualified personnel with at least one member of your stormwater pollution prevention team participating. Inspectors must consider the results of visual and analytical monitoring (if any) for the past year when planning and conducting inspections. Qualified personnel are those who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at your facility, and who can also evaluate the effectiveness of control measures.*

2. **Schedules for conducting inspections.** All stormwater/sewer location will be inspected periodically through the week or at the time of a discharge.

   *Note: Inspections must be conducted at least quarterly. At least one of your routine inspections must be conducted during a period when a stormwater discharge is occurring.*

3. **List areas where industrial materials or activities are exposed to stormwater.** Tanks and equipment staging areas.

4. **List areas identified in the SWPPP (section 1 of the SWPPP Template) and any others that are potential pollutant sources (see Section 6.2.3).** N/A

5. **Areas where spills and leaks have occurred in the past 3 years.** No spills have occurred at the facility.

6. **Inspection information for discharge points.** No discharge is expected due to slope of facility.

7. **List the control measures used to comply with the effluent limits contained in this permit.** CHESI has the ability to control all runoff from the site. The site is controlled by a manual plug that is removed after the water has been inspected and meets visual discharge criteria.
8. Other site-specific inspection objectives. N/A

4.2.2 Quarterly Visual Assessment of Stormwater Discharges.

<table>
<thead>
<tr>
<th>Instructions (see 2019 MSGP Section 4.5):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Describe the procedures you will follow for conducting quarterly visual assessments in accordance with Section 4.5 of the 2019 MSGP. The visual assessment must be made:</td>
</tr>
<tr>
<td>• Of a discharge sample contained in a clean, clear glass, or plastic container, and examined in a well-lit area;</td>
</tr>
<tr>
<td>• On samples collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample shall be collected as soon as practicable after the first 30 minutes and you must document why it was not possible to take the sample within the first 30 minutes. In the case of snowmelt, samples must be taken during a period with a measurable discharge from your site; and</td>
</tr>
<tr>
<td>• For storm events, on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if you document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period.</td>
</tr>
</tbody>
</table>

Document the results of your visual assessments and maintain this documentation onsite with your SWPPP as required in Section 6.6 of the 2019 MSGP. Any corrective action required as a result of a quarterly visual assessment must be performed consistent with Section 5 of the 2019 MSGP.

For quarterly visual assessments to be performed at your site, your SWPPP must include a description of the following:

1. **Person(s) or positions of person(s) responsible for assessments.** General Manager, Facility Operations Supervisor

2. **Schedules for conducting assessments.** All storm/sewer locations will be inspected extensively quarterly starting January of every year to ensure there is no potential release due to additional equipment or storage of waste added throughout the year before.

3. **Specific assessment activities.** Secondary containment and most North parking lot including stormwater trench at the most North and South locations on the property. The visual assessment includes observation of color, odor, clarity, evident solids, foam, oil sheen and other obvious indicators of stormwater pollution.
4.2.3 Exception to Routine Facility Inspections and Quarterly Visual Assessments for Inactive and Unstaffed Sites.

Instructions (see 2019 MSGP Sections 4.4.1 and 4.8.3):

If you are invoking the exception for inactive and unstaffed sites relating to routine facility inspections and/or quarterly visual assessments, you must include documentation to support your claim that your facility has changed its status from active to inactive and unstaffed.

To invoke this exception you must also include a statement in your SWPPP per Section 6.2.5.5 indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to stormwater, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii). The statement must be signed and certified in accordance with Appendix B, Subsection 11.

Note: If circumstances change and industrial materials or activities become exposed to stormwater or your facility becomes active and/or staffed, this exception no longer applies and you must immediately resume routine facility inspections. If you are not qualified for this exception at the time you become authorized under the 2019 MSGP, but during the permit term you become qualified because your facility becomes inactive and unstaffed, and there are no industrial materials or activities that are exposed to stormwater, you must include the same signed and certified statement as above and retain it with your records pursuant to Section 6.3.

☐ This site is inactive and unstaffed, and has no industrial materials or activities exposed to stormwater, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii) as signed and certified in Section 7 below.

If you are invoking the exception for inactive and unstaffed sites for your routine facility inspections and/or quarterly visual assessments, include information to support this claim.
4.3 Monitoring.

**Instructions (see 2019 MSGP Section 6.2.5.2):**

Describe your procedures for conducting the five types of analytical monitoring specified by the 2019 MSGP, where applicable to your facility, including:

- Effluent limitations guidelines monitoring (2019 MSGP Section 7.3 and relevant requirements in Section 9);
- Impaired waters monitoring (2019 MSGP Section 7.4);
- Other monitoring as required by The Division (2019 MSGP Section 7.7).

Depending on the type of facility you operate, and the monitoring requirements to which you are subject, you must collect and analyze stormwater samples and document monitoring activities consistent with the procedures described in 2019 MSGP Section 10.6, 10.7, and 10.8. Refer to 2019 MSGP Section 8 for reporting and recordkeeping requirements. **Note:** *All monitoring must be conducted in accordance with the relevant sampling and analysis requirements at 40 CFR Part 136.* Include in your description procedures for ensuring compliance with these requirements.

If you plan to use the substantially identical discharge point exception for your impaired waters monitoring requirements, and/or your quarterly visual assessment, you must include the following documentation:

- Location of each of the substantially identical discharge points;
- Description of the general industrial activities conducted in the drainage area of each discharge point;
- Description of the control measures implemented in the drainage area of each discharge point;
- Description of the exposed materials located in the drainage area of each discharge point that are likely to be significant contributors of pollutants to stormwater discharges;
- An estimate of the runoff coefficient of the drainage areas (low = under 40%; medium = 40 to 65%; high = above 65%);
- Why the discharge points are expected to discharge substantially identical effluents.

Check the following monitoring activities applicable to your facility:

- [ ] Effluent limitations guidelines monitoring
- [ ] Impaired waters monitoring
- [ ] Other monitoring as required by The Division

For each type of monitoring checked above, your SWPPP must include the following information:

**Substantially identical discharge point (outfall) exception** (if applicable)

If you plan to use the substantially identical discharge point exception for your quarterly visual assessment requirements, include the following information here to substantiate your claim that these discharge points are substantially identical (2019 MSGP Section 6.2.6):

- Location of each of the substantially identical discharge points: N/A
- List the general industrial activities conducted in the drainage area of each discharge point: N/A
- List the control measures implemented in the drainage area of each discharge point: N/A
- List the exposed materials located in the drainage area of each discharge point that are likely to be significant contributors of pollutants to stormwater discharges: N/A
• An estimate of the runoff coefficient of the drainage areas (low=under 40%; medium=40 to 65%; high =above 65%): N/A
• Why the discharge points are expected to discharge substantially identical effluents: N/A

SECTION 5: CORRECTIVE ACTIONS.

Instructions (see 2019 MSGP Section 5):
Describe the procedures for taking corrective action in compliance with Section 5 of the 2019 MSGP.

There are no correction action activities for the site.
SECTION 6: SWPPP CERTIFICATION.

Instructions (see 2019 MSGP Section 6.3):
The following certification statement must be signed and dated by a person who meets the requirements of Section 10.27 of the 2019 MSGP.

Note: this certification must be re-signed in the event of a SWPPP modification in response to a Section 5.2 trigger for corrective action.

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 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.

Name: Will Roberts
Title: Facility Operations Supervisor
Signature: [Signature]
Date: 10-22-2022
SECTION 7: SWPPP MODIFICATIONS.

Instructions (see 2019 MSGP Section 6.5):
Your SWPPP is a "living" document and is required to be modified and updated, as necessary, in response to corrective actions. See Section 5 of the 2019 MSGP.
- If you need to modify the SWPPP in response to a corrective action required by Section 5.2 of the 2019 MSGP, then the certification statement in section 6 of this SWPPP template must be re-signed in accordance with 2019 MSGP Section 10.27.
- For any other SWPPP modification, you should keep a log with a description of the modification, the name of the person making it, and the date and signature of that person. See 2019 MSGP Section 10.

<table>
<thead>
<tr>
<th>Revision No.</th>
<th>Description of Revision</th>
<th>Date of Revision</th>
<th>Revision Prepared by Name and Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Facility Operator changed from Patrick T. Heyneman to Bryan Greager</td>
<td>7/22/2013</td>
<td>Daniel Olivas, Ops. Manager</td>
</tr>
<tr>
<td>2</td>
<td>Section 1.2 updated for change of ownership</td>
<td>7/19/2019</td>
<td>William Connors, SVP Compliance</td>
</tr>
<tr>
<td>3</td>
<td>Updated to 2019 MSGP Template</td>
<td>8/22/2019</td>
<td>Jessica Zebre, Sr. Env Compliance Manager</td>
</tr>
<tr>
<td>4</td>
<td>Updated to CHESI and Will Roberts</td>
<td>1-14-21</td>
<td>Nick Culian, Sr. Env Compliance Manager</td>
</tr>
<tr>
<td>5</td>
<td>Updated Plan to change oily water storage vessels to double walled frac tanks</td>
<td>10-22-2022</td>
<td>William Roberts, Facility Operations Supervisor</td>
</tr>
<tr>
<td>6</td>
<td>Updated Compliance Manager to Sam Barket</td>
<td>10-22-2022</td>
<td>William Roberts, Facility Operations Supervisor</td>
</tr>
</tbody>
</table>

SWPPP ATTACHMENTS

Attach the following documentation to the SWPPP:

**Attachment A – General Location Map**
Include a copy of your general location map in Attachment A.

**Attachment B – Site Map**
Include a copy of your site map(s) in Attachment B.
Attachment C – Copy 2019 MSGP (permit itself), copy of the signed electronic NOI certification page submitted to the Division, and copy of the NOI approval letter received from the Division
Attachment A – General Location Map

Old Poly Lined Secondary Containment (tanks were removed)

Location of two 18,400 Double-walled Frac Tanks
Attachment C – Copy 2019 MSGP (permit itself), copy of the signed electronic NOI certification page submitted to the Division, and copy of the NOI approval letter received from the Division
SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN
SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC) PLAN

for

Clean Harbors
Las Vegas

4435 E. Colton Ave. Suite 101
Las Vegas, NV 89115

Latitude: 36.2198
Longitude: -115.0773

Designated Person Accountable for Spill Prevention:
(update as appropriate)

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>William C. Roberts (Primary SPCC Contact)</td>
<td>702-396-4148 Office</td>
</tr>
<tr>
<td></td>
<td>702-758-6019 Cell</td>
</tr>
<tr>
<td>Nick Culian (Alternate SPCC Contact)</td>
<td>530-636-2632 Cell</td>
</tr>
</tbody>
</table>

This SPCC plan has been prepared in accordance with Code of Federal Regulations 40 CFR 112-Oil Pollution Prevention. Implementation of the plan is the responsibility of Clean Harbors.
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Appendix A Storage Tank Data
Appendix B Secondary Containment Calculations
Appendix C Weekly Inspection Form (example)
Appendix D Annual Inspection Form (example)
Appendix E Drainage Discharge Report Form
Appendix F SPCC Training/Meeting Form
Appendix G Certification of the Applicability of the Substantial Harm Criteria Checklist
Appendix H Emergency Contacts, Phone Numbers and Discharge Notification Form
Appendix I Site Map, Site Plan and SPCC Drawings
Introduction

The following Spill Prevention Control and Countermeasure (SPCC) Plan has been developed in accordance with good engineering practices and in accordance with federal regulations 40 CFR Part 112. The plan has been prepared in the same format as EPA’s sample SPCC plan found in their 2013 SPCC Guide for Regional Inspectors.

The purpose of this SPCC Plan is to describe measures implemented by Clean Harbors to prevent discharges from occurring, and to prepare Clean Harbors to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge. For all emergencies, including oil spills, Clean Harbors facility managers and assistant managers have been instructed to contact the company environmental coordinator who will assist in response, reporting and cleanup as necessary.

In addition to fulfilling requirements of 40 CFR part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

Clean Harbors management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the “Substantial Harm Determination” included in Appendix G of this Plan.

This Plan provides guidance on key actions that Clean Harbors must perform to comply with the SPCC rule, including:

- Complete weekly inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in the Appendices.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document training on the log included in Appendix F.
- If either of the following occurs:
  1. The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event;

1 U.S. EPA SPCC Guidance for Regional Inspectors, Updated August 2013, Appendix D
2. The facility discharges more than 42 gallons of oil in each of two discharges into or upon the navigable waters of the United States or adjoining shorelines in two spill events occurring within any twelve-month period;

then,

Clean Harbors will submit to the EPA Region 9 Regional Administrator (RA) and the Nevada Department of Environmental Protection (NDEP) the following information (see Section 3.3):

1. Name of the facility
2. Name of the owner or operator of the facility
3. Location of the facility
4. Maximum storage or handling capacity of the facility and normal daily throughput
5. The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements
6. Adequate description of the facility, including maps, flow diagrams, and topographical maps
7. The cause(s) of such spills, including a failure analysis of the system or subsystem in which the failure occurred
8. Additional preventative measures taken or contemplated to minimize the possibility of recurrence
9. Such other information as the Regional Administrator may reasonably require pertinent to the SPCC plan or spill event.

- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page in Section 1.2 of this Plan.

- Amend the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility’s spill potential. The revised Plan must be recertified by a Professional Engineer (PE).

- Review the Plan on an annual basis. Update the Plan to reflect any “administrative changes” that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan, but do not have to be certified by a PE.
Part 1 Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

This SPCC Plan was developed in accordance with the guidelines provided in 40 CFR Part 112. This SPCC Plan provides specific policies and procedures for the protection and wellbeing of Clean Harbors employees, the public, and the environment. This SPCC Plan has been prepared with the full support and approval of Clean Harbors management, who have the authority to commit necessary resources. The manpower, equipment and materials required to prevent and control oil spills into waters of the United States as detailed in this SPCC Plan will be implemented as herein described. Clean Harbors has implemented this plan and will amend it as necessary with respect to facility expansion, modification, or improvement.

It is believed this SPCC plan meets applicable State and local requirements for spill prevention, control and countermeasures.

Authorized Representative:

Signature: ___________________________ Title: ___________________________

Date: _______________________________

The facility has designated a person to be accountable for spill prevention, spill mitigation and reporting to both facility management and applicable authorities. The designated individual is listed on the cover page of this SPCC Plan.
1.2 Professional Engineer Certification (40 CFR 112.3(d))

I hereby certify and attest that I am familiar with the requirements of 40 CFR Part 112. I, or my agent, have visited and examined the facility. To the best of my knowledge and belief, the information contained in this plan is true, complete, and accurate. I attest that this plan has been prepared in accordance with good engineering practices including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112. Procedures for required inspections and testing have been established. It is my opinion that this SPCC plan is adequate for this facility.

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR part 112. This plan is valid only to the extent that the facility owner maintains, tests, and inspects equipment, containment, and other devices as prescribed in this plan.

Date: Aug 1, 2022

Name: Blaine Zwahlen

Company: Engineering and Environmental Services, Inc.

Signed:

State Registration #: 018322
1.3 Location of SPCC Plan (40 CFR 112.3(e))

A copy of the SPCC plan will be kept at the Clean Harbors facility in the main office and will be available to regulatory agencies upon request.

1.4 Plan Review (40 CFR 112.3 and 112.5)

The Spill Prevention Control and Countermeasure (SPCC) Plan shall be reviewed and, if necessary, amended should any of the following occur:

1. Discharge of 1,000 gallons of oil into or upon the navigable waters (includes wetlands and storm sewer systems) of the United States or adjoining shorelines in a single spill event.

2. Discharge more than 42 gallons of oil in each of two discharges into or upon the navigable waters of the United States or adjoining shorelines in two spill events occurring within any twelve-month period.

3. Change in the facility design, construction, operation or maintenance which materially affects the facilities potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

Major amendments to the SPCC plan meeting one or more of the above criteria shall be reviewed and certified by a Registered Professional Engineer. Each amendment of the SPCC plan shall also result in a complete review and evaluation of the SPCC plan. Minor amendments such as changing names of facility personnel, changing phone numbers or updating the list of facility contacts will not require certification by a professional engineer.

A complete review and evaluation of the SPCC plan shall be performed at least once every five years from the most recent certification date. Should there be no changes; documentation of this review shall be affixed to the SPCC plan. The information in Table 1-1 and Company Review form (following pages) should be completed to document all SPCC reviews.
1.4.1 Record of Plan Reviews

Scheduled reviews and Plan amendments are recorded in the Plan Review Log (Table 1-1). This log must be completed even if no amendment is made to the Plan as a result of the review.

Table 1-1: Plan Review Log

<table>
<thead>
<tr>
<th>By</th>
<th>Date</th>
<th>Activity</th>
<th>PE certification required?</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blaine Zwahlen</td>
<td>July 2022</td>
<td>Develop New SPCC Plan</td>
<td>Yes</td>
<td>Developed new SPCC plan for the facility that includes new storage tanks.</td>
</tr>
</tbody>
</table>
SPCC Review Documentation

Company Review

Review Date: ____________________________

“I have completed review and evaluation of this SPCC Plan and will / (will not) amend the Plan as a result”.  

(Circle one)

Signature: ________________________________

Comments: ______________________________________________________

Review Date: ____________________________

“I have completed review and evaluation of this SPCC Plan and will / (will not) amend the Plan as a result”.  

(Circle one)

Signature: ________________________________

Comments: ______________________________________________________

Review Date: ____________________________

“I have completed review and evaluation of this SPCC Plan and will / (will not) amend the Plan as a result”.  

(Circle one)

Signature: ________________________________

Comments: ______________________________________________________
1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

It is believed all necessary SPCC facilities, procedures, methods and equipment are in operation at this facility with the following exceptions:

- A sign reminding drivers to be properly connected during loading/unloading and properly disconnected when finished needs to be in place at the loading/unloading connections.
- A spill pan for use during truck loading/unloading at the double-walled tanks needs to be in place.

1.6 Cross-Reference with SPCC Provisions (40 CFR 112.7)

The following table references SPCC regulations in 40 CFR Part 112 with corresponding sections in this SPCC plan:

<table>
<thead>
<tr>
<th>Regulatory Section in 40 CFR Part 112</th>
<th>Description of Required Information</th>
<th>Clean Harbors SPCC Plan Format</th>
</tr>
</thead>
<tbody>
<tr>
<td>112.3 (d)</td>
<td>Professional Engineering Stamp</td>
<td>1.2</td>
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<tr>
<td>112.4</td>
<td>SPCC Plan Amendment by Regional Administrator</td>
<td>1.4</td>
</tr>
<tr>
<td>112.5</td>
<td>SPCC Plan Amendment by owner/operator</td>
<td>1.4</td>
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<tr>
<td>112.7 – General Requirements for SPCC Plans</td>
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<tr>
<td>112.7 (a)(1)</td>
<td>Discussion of facility’s conformance with Part 112</td>
<td>All Plan Sections</td>
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<tr>
<td>112.7 (a)(2)</td>
<td>Compliance with applicable portions of Part 112</td>
<td>All Plan Sections</td>
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<tr>
<td>112.7 (a)(3)</td>
<td>Description of Physical Layout and Facility Diagram</td>
<td>2.1, 3.2, Appendix I</td>
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<tr>
<td>112.7(a)(3)(i)</td>
<td>Type of oil in each container and its storage capacity</td>
<td>4.2</td>
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<td>112.7(a)(3)(ii)</td>
<td>Discharge prevention measures</td>
<td>Part 3</td>
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<tr>
<td>112.7(a)(3)(iii)</td>
<td>Discharge and drainage controls</td>
<td>3.4, 4.1</td>
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<tr>
<td>112.7(a)(3)(iv)</td>
<td>Countermeasures for discharge discovery, response and cleanup</td>
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<td>112.7(a)(3)(v)</td>
<td>Disposal methods for recovered materials</td>
<td>5.3</td>
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<td>112.7(a)(3)(vi)</td>
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<td>Discharge response procedures</td>
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<td>Explanation why secondary containment structures are not practicable</td>
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<td>Written commitment of manpower, equipment and materials for response to discharge</td>
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<td>Description</td>
<td>Reference</td>
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</tr>
<tr>
<td>112.8(d)(4)</td>
<td>Inspection and testing of aboveground piping, valves and appurtenances</td>
<td>4.3.4, 3.7</td>
</tr>
<tr>
<td>112.8(d)(5)</td>
<td>Warning to protect aboveground piping or oil transfer operations from vehicular traffic</td>
<td>4.3.5</td>
</tr>
<tr>
<td>112.20</td>
<td>Requirement to develop Facility Response Plan</td>
<td>N/A</td>
</tr>
<tr>
<td>112.21</td>
<td>Requirement to conduct facility response training and drills</td>
<td>N/A</td>
</tr>
<tr>
<td>112. Appendix C</td>
<td>Substantial Harm Criteria Certification Form</td>
<td>Appendix G</td>
</tr>
</tbody>
</table>

Spill Prevention Control and Countermeasures (SPCC) Plan ● Clean Harbors ● Las Vegas, NV
Part 2 General Facility Information

2.1 Facility Description (40 CFR 112.7(a)(3))

Clean Harbors’ Las Vegas facility operates as a storage and transfer facility for oily water and oily wastes. Oily water is collected in trucks and transferred into Clean Harbors’ aboveground storage tanks. The facility also handles 55-gallon drums and 275- to 300-gallon totes of oily wastes and debris. In addition, the facility has several drums of new oil, coolants, and cleaners/solvents. Drums and totes are stored within concrete containment structures or on spill-containment pallets within the warehouse.

The oily-water storage tanks are double-walled. These tanks are located within poly-lined secondary containment. The double-walled tanks are designed to provide secondary containment for the entire tank volume. The containment capacity of the outer tank is 122% of the inner storage tank volume. Transfers to/from the oily-water tanks is done with the use of truck pumps, hoses, and connections. A spill-containment pan is placed under truck connections during loading/unloading operations.

There is a curbed concrete pad that can be utilized for parking partially loaded vacuum trucks and solids roll-off boxes. Other curbed concrete pads can be used to store 55-gallon drums of solids and oily wastes/debris.

Figures depicting the site location, site layout and surface drainage are included in Appendix I of this Plan. The figures show the layout of the facility, including oil storage locations, buildings, and critical spill control structures.

2.1.1 Oil Storage

Oil storage at the facility consists of aboveground double-walled storage tanks and 55-gallon drums. Oil storage containers are located within secondary containment (double-walled tank containment, curbed concrete pads, and spill-containment pallets).

2.1.2 Additional Facility Information

A. Facility Address, and Telephone
   Clean Harbors
   4435 E. Colton Ave. Suite 101
   Las Vegas, NV 89115
   702-396-4148

B. Facility Owner and Operator, Address, and Telephone
   Clean Harbors Environmental Services
   42 Longwater Drive
   Norwell, MA 02061
   800-282-0058
C. Current Facility Geographic Location Description

Approximate Facility Coordinates:
Latitude: 36.2198
Longitude: -115.0773
2.2 Evaluation of Discharge Potential

Clean Harbors will minimize the potential for any release of oil to the surrounding areas with the use of secondary containment, implementation of a facility, container and equipment inspection program, and a training program designed to educate employees in spill prevention. While experience has proven that the potential for equipment failure is low there remains a chance for material to be released onto the property. This section addresses the spill potential for the facility.

The areas of spill potential are as follows:

A. Storage tanks and/or associated piping/equipment failure.
B. Truck loading/unloading operations.
C. Vacuum truck parking.
D. 55-gallon drum handling and storage.

A. If an oily-water storage tank or associated piping or equipment failed and if the secondary containment associated with that tank failed there is a potential for material to be released from the site. The release point would vary depending on the location; however, the terrain surrounding the Clean Harbors storage tanks and loading/unloading areas generally slopes south towards a retaining wall and then east or west to the corners of the property.

The most likely release from a tank or associated piping would be from a leaking pipe or hose, a leaking valve, overfilling a tank. It is unlikely a double-walled frac tank itself would be compromised and the outer wall serves as secondary containment, in addition to the poly-lined secondary containment under the tank and associated hose connections.”

B. A release from a truck loading/unloading oily water is possible if there is a failure in the loading/unloading equipment or from driver error during the loading/unloading operations. A release from loading/unloading operations would flow into a spill-containment basin that is placed under the truck connections or into the poly-lined containment area around the tanks. Outside of the containment basin and poly-lined area, flow generally slopes south towards a retaining wall and then east or west to the corners of the property.

It is anticipated that the driver will detect a spill or problem and respond by shutting down the flow within 30 seconds. At 100 gal/min, a 30 second spill would release about 50 gallons. This amount would be contained in the spill pans or in the poly-lined secondary containment that can hold approximately 2,000 gallons.

C. On occasion partially loaded vacuum trucks are parked on a curbed concrete pad until they can be unloaded into the oily-water tank(s). The vacuum truck maximum capacity is 70 barrels (2,940 gallons). The most likely release from a
vacuum truck would be from a valve being opened. A release outside of the curbed concrete pad would be south to the corner of the property.

D. 55-gallon drums and 275- to 330-gallon totes of oily debris, solids, lube oil, antifreeze, and cleaners/solvent are stored on site within curbed concrete pads or on spill-containment pallets within the warehouse. Discharge from a drum or tote would be contained within concrete pad(s) or within the containment pallets. The most likely spill scenarios from drums and totes would be from a drum puncture, e.g., by a forklift, or from a tipped over drum.

Table 2.2 lists the predicted failure, flow direction, flow rate and containment methods for potential release points:

### Table 2.2 Potential Discharge Situations at Clean Harbors-Las Vegas

<table>
<thead>
<tr>
<th>Source</th>
<th>Type of Failure</th>
<th>Volume (gal.)</th>
<th>Discharge Rate (gal/hr.)</th>
<th>Direction of Flow</th>
<th>Containment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oily-water Storage Tanks 1, 2</td>
<td>Tank overfill, tank leak, fitting leak, piping leak or failure.</td>
<td>18,430</td>
<td>24,000 (400 gpm)</td>
<td>Within containment. Outside of containment flow is south towards retaining wall and then east or west to the property corners</td>
<td>Double-walled storage tank set on a poly-lined containment basin. Outer tank has capacity to contain 122% of inner storage tank volume.</td>
</tr>
<tr>
<td>Truck Loading/ Unloading</td>
<td>Truck tank rupture; hose failure; valve failure; driver error</td>
<td>50-gallon from most likely event, 30 second release at 100 gpm</td>
<td>6,000 (100 gpm)</td>
<td>Within containment. Outside of containment flow is south towards retaining wall and then east or west to the property corners</td>
<td>Containment basin under truck connections, poly-lined basin under tanks, spill kits.</td>
</tr>
<tr>
<td>Vacuum Truck Parking</td>
<td>Valve opened on vacuum tank</td>
<td>3,000</td>
<td>6,000 (100 gpm)</td>
<td>Flow outside of the curbed concrete pad is south to the SW corner of the property.</td>
<td>Curbed concrete pad.</td>
</tr>
<tr>
<td>55-gallon Drums 275- to 330-gallon totes</td>
<td>Drum rupture, drum tip over</td>
<td>55 275 to 300</td>
<td>1,500 (25 gpm)</td>
<td>Onto curbed concrete floor or into containment pallet. Outside of containment and outside of the warehouse flow is south across the paved asphalt driveway.</td>
<td>Curbed concrete pads, spill-containment pallets, spill kits and absorbent floor sweep.</td>
</tr>
</tbody>
</table>
2.2.1 SPILL HISTORY

A. Spill Events and Discharge History

There have been no significant reportable spill events or discharges at this facility.

B. Written Description of Spills, Corrective Action Taken, and Plans for Prevention Recurrence

The following table should be used to summarize spills or discharges, corrective actions taken and plans for preventing a recurrence:

<table>
<thead>
<tr>
<th>Description of Discharge</th>
<th>Corrective Actions Taken</th>
<th>Plans for Preventing Recurrence</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2.2.2 Distance to Navigable Waters

Storm water on the property flows south towards a retaining wall. At the retaining wall flow is east or west to the south corners of the property. Drainage from the SE corner is controlled by a normally closed valve that can be opened to drain clean storm water to the adjacent property. Drainage from the adjacent property is into the municipal storm drain system along East Cheyenne Ave. The distance from the Clean Harbors property to the municipal storm drains along East Cheyenne Ave. is about 660 feet. The municipal storm drains system flows into the Las Vegas Wash (located about 2.6 miles south of the Clean Harbors site). The Las Vegas Wash flows into Lake Las Vegas. Lake Las Vegas is located about 11 miles SE of the Clean Harbors property. The municipal storm drain system, the Las Vegas Wash and Lake Las Vegas are considered the nearest navigable waters.
Part 3 Discharge Prevention – General SPCC Provisions

The following measures are implemented to prevent discharges during the storage, handling, use, or transfer of products at the facility. Appropriate employees will be trained in the proper implementation of these measures.

3.1 Compliance with Applicable Requirements (40 CFR 112.7(a)(2))

This facility uses double-walled tanks, concrete structures, poly-lined structures, spill pans, containment pallets, and spill kits to provide secondary containment for oil-storage tanks/containers and most oil-related activities. The facility does not have a truck rack but has a designated area for loading/unloading oily water. It is believed containment at this facility provides environmental protection equivalent to the requirements under 112.8(b)(3) to use ponds, lagoons, or catchment basins to retain oil at the facility in the event of an uncontrolled discharge.

The double-walled tanks are designed to provide secondary containment for the entire tank volume. The containment capacity of the outer tank is 122% of the inner storage tank volume. The horizontal double walled tanks are inspected weekly and annually for any leaks or spills, including checking the interstitial space. Because a leak from a tank would be readily detected within the interstitial space of a double-walled tank, and because of the small size of these tanks, required integrity testing of the double-walled tanks will be accomplished by weekly and annual tank inspections conducted by Clean Harbors. Also, in accordance with Clean Harbors “Tank Inspection Best Management Practice Document”, OS-15.0, the double walled tanks will be internally inspected by a qualified Steel Tank Institute (STI) or API inspector within 10 years (by July 2032) and then at least every 30 years thereafter. External tank inspections will be conducted at least every 20 years by a STI or API inspector.

Brittle-fracture analysis, in accordance with API 653, will not be required since the tanks at this facility are small shop-welded tanks (40 CFR Part 112.7(i)) and/or the shell thickness of the tanks at this facility is less than one-half inch. As discussed in the American Petroleum Institute (API) Standard 653 Tank Inspection, Repair, Alteration, and Reconstruction (API-653), brittle fracture is not a concern for tanks that have a shell thickness of less than one-half inch. This is the extent of the brittle fracture evaluation for the tanks at this facility.

3.2 Facility Layout Diagram (40 CFR 112.7(a)(3))

Drawings attached in Appendix I show the general layout of the facility with approximate storage locations, drainage direction, drainage points, etc.
3.3 Spill Reporting (40 CFR 112.7(a)(4))

Spills of oil into or upon the navigable waters (including wetlands and municipal storm water systems) of the United States or adjoining shorelines will be reported **IMMEDIATELY** by the person responsible for spill prevention or the alternate qualified individual (see Cover Page of this plan) to the following:

William C. Roberts (primary SPCC contact)  
Facility Operations Supervisor  
702-396-4148 office  
702-758-6019 cell

Nick Culian (alternate SPCC contact)  
Sr. Environmental Compliance Manager  
530-636-2632 cell

U. S. Coast Guard, Washington, D.C.  
800-424-8802

State Environmental Protection Agency:  
Nevada Department of Environmental Protection  
333 W. Nye Lane, Room 138  
Carson City, Nevada 89706-0851  
(775) 687-4670 -- Fax 687-5856

Spill Response 24-hour communications center:  
1-888-331-6337  
Outside of Nevada:  
1-775-687-9485

The verbal spill report shall include the following:

1. The name of the person making the report and their job title.
2. The name, phone number and address of the facility.
3. Time and date of the discharge.
4. Identity of the petroleum oil discharged.
5. Approximate quantity discharged.
6. Location and source of discharge.
7. Cause and circumstances of the discharge.
8. Description of all affected media (soil, pavement, waterway, etc.)
9. Existing and potential hazards, including whether or not an evacuation may be needed.
10. Personal injuries or casualties, if any.
11. Corrective action being taken and an appropriate timetable to control, contain and clean up the discharge.
12. Name(s) and telephone number(s) of individual(s) who discovered the discharge.
13. Identity of the personnel currently at the site of the discharge.
14. Other unique or unusual circumstances.
15. Other government agencies that have been notified or will be notified.
The Discharge Notification Form included in Appendix H, or substantially similar form, will be completed upon detection of a discharge. An Incident Entry must be completed through Clean Harbor’s WIN Web for all spills. Emergency Coordinators will attempt to complete a Discharge Notification Form prior to reporting a spill to the proper notification contacts. If the form cannot reasonably be completed prior to notifications, the Emergency Coordinator shall complete the form within 24 hours.

Should the facility incur a spill in excess of 1,000 gallons in a single event or have two reportable spill events within any twelve-month period, the facility shall submit to its U.S. EPA Regional Administrator within 60 days from the time the facility became aware of the spill, the following:

1. Name of the facility
2. Name of the owner or operator of the facility
3. Location of the facility
4. Maximum storage or handling capacity of the facility and normal daily throughput
5. The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements
6. Adequate description of the facility, including maps, flow diagrams, and topographical maps
7. The cause(s) of such spills, including a failure analysis of the system or subsystem in which the failure occurred
8. Additional preventative measures taken or contemplated to minimize the possibility of recurrence
9. Such other information as the Regional Administrator may reasonably require pertinent to the SPCC plan or spill event

This information will be submitted to the appropriate EPA Regional Administrator:

EPA Region 9 Administrator
75 Hawthorne Street
San Francisco, CA 94105
Phone: 866-372-9378

This information will also be provided to the appropriate agency or agencies in charge of oil pollution control activities in the State of Nevada (see above phone number for State of Nevada contact). The State of Nevada requires that spills be reported no later than the end of the first working day of the release. A copy of the Nevada DEP Spill Reporting Form and instructions is attached in Appendix H.

2. Discharge more than 42 gallons of oil in each of two discharges into or upon the navigable waters of the United States or adjoining shorelines in two spill events occurring within any twelve-month period
3.4 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))

Table 2.2, above in Section 2.2, lists discharge volumes and direction of flow for potential discharge points at the facility.

3.5 Containment and Diversionary Structures (40 CFR 112.7(c))

The facility is designed to prevent, contain and/or divert oil discharge from reaching a navigable watercourse by having a combination of these systems in place:

- Double-walled storage tanks.
- Containment areas with adequate capacity and sufficiently impervious to contain spilled oil.
- Absorbent spill-kit materials.
- Spill-containment drum storage pallets.

Secondary Containment (40 CFR 112.7 (c)(1))

Oily water storage tanks are double walled. The double-walled tanks are designed to provide secondary containment for 122% of the entire inner tank volume. A leak from the inner tank can be detected within the interstitial space between the inner and outer tanks.

55-gallon drums and 275-300-gallon totes of oily solids, oily debris, new oil, coolants, and cleaners/solvents are handled and stored on curbed concrete pads or on spill-containment pallets in the warehouse. Secondary containment for drums and totes is provided by curbed concrete pads or containment pallets.

There are no loading/unloading racks at this facility. There is a designated loading/unloading area at the double-walled oily-water tanks. During loading/unloading trucks are parked adjacent to the Tank Farm. Transfers to/from the oily-water tanks is done with the use of truck pumps, hoses, and connections. A spill-containment pan is placed under truck connections during loading/unloading operations. It is anticipated that the delivery driver will detect a spill or problem and respond by shutting down the flow within 30 seconds. At 100 gpm loading/unloading, a 30 second spill would release about 50 gallons. This amount will be contained in the containment basin under the truck connections or in the poly-lined area around the tanks.

There is a curbed concrete pad that can be utilized for parking partially loaded vacuum trucks, totes, and solids roll-off boxes. Other curbed concrete pads can be used to store 55-gallon drums of solids and oily wastes/debris.

Secondary containment calculations are detailed in Appendix B.

Drainage Control (40 CFR 112.8 (b))

Drainage on and around the property is described above in Section 2.2.2.
Drainage from diked outside storage areas/secondary containment (40 CFR 112.8 (b)(1))
There are no drainage valves from the outside curbed concrete pads adjacent to the warehouse. The concrete pads on the west side of the property have normally plugged drainage conduits. Before draining water from these pads, the person draining the water must first inspect the water for oil or oil sheen. The form in Appendix E must be completed to document inspection of drained water.

Storage in the warehouse is not exposed to precipitation. There is no drainage from the warehouse.

Valves used on diked area storage (40 CFR 112.8 (b)(2))
There are no flapper-type valves of any kind installed to drain containment areas.

Plant drainage systems from undiked areas (40 CFR 112.8 (b)(3))
Storm water on the property flows south towards a retaining wall. At the retaining wall flow is east or west to the south corners of the property. Drainage from the SE corner is controlled by a normally closed valve that can be opened to drain clean storm water to the adjacent property. Drainage from the adjacent property is into the municipal storm drain system along East Cheyenne Ave. The distance from the Clean Harbors property to the municipal storm drains along East Cheyenne Ave. is about 660 feet. The municipal storm drain system flows into the Las Vegas Wash (located about 2.6 miles south of the Clean Harbors site). The Las Vegas Wash flows into Lake Las Vegas. Lake Las Vegas is located about 11 miles SE of the Clean Harbors property.

Final discharge of drainage (40 CFR 112.8 (b)(4))
See above section.

Facility Drainage Systems and Equipment (40 CFR 112.8 (b)(5))
The drawings in Appendix I show the general drainage plan for the property. The drainage system is further described in Section 2.2.2 of this SPCC plan.

3.6 Practicability of Secondary Containment (40 CFR 112.7(d))
Secondary containment has been deemed practical for this facility.
3.7 **Inspections, Tests and Records (40 CFR 112.7(e))**

It is the responsibility of facility operating personnel to ensure that facility observations occur daily as a part of regular operations. Formal tank and facility inspections occur on a weekly, and annual basis (see example forms in Appendices C and D). Tank and facility inspections will be completed in the Clean Harbors Waste Information Network (WIN). The forms provided in the Appendices show the elements that will be inspected. These forms (or equivalent) will be utilized if the Clean Harbors WIN system is not operational. Inspection records will be maintained and kept on file for a minimum of three years in the WIN system or in the Clean Harbors office.

Table 3.7 shows the inspections performed, required frequency, and type of documentation that is used:

### Table 3.7. Routine Inspections and Training for SPCC Compliance

<table>
<thead>
<tr>
<th>Type</th>
<th>Frequency</th>
<th>Forms/Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daily Visual Observation/Inspection</td>
<td>Daily (during workdays)</td>
<td>No forms or records for daily observations.</td>
</tr>
<tr>
<td>Weekly Inspections</td>
<td>Weekly</td>
<td>Weekly WIN Inspection Form (or equivalent) Appendix C</td>
</tr>
<tr>
<td>Annual Inspections</td>
<td>Annually</td>
<td>Annual WIN Tank Inspection Form (or equivalent) Appendix C</td>
</tr>
<tr>
<td>Storm Water Transfer Inspection</td>
<td>As Needed, before draining a secondary containment area</td>
<td>Facility Storm Water Transfer Record in Appendix E</td>
</tr>
<tr>
<td>New Employee Training</td>
<td>As Needed</td>
<td>SPCC Training/Meeting Form (Section 3.8 and Appendix F)</td>
</tr>
<tr>
<td>Annual SPCC Training</td>
<td>Annual</td>
<td>SPCC Training/Meeting Form (Section 3.8 and Appendix F)</td>
</tr>
<tr>
<td>Tank Integrity Testing</td>
<td>Weekly and Annual Tank Inspections by Clean Harbors and: Internal inspection within 10 years (July 2032) and every 30 years thereafter and External Inspection every 20 years Per STI Standards SP001 for Category 1 Tanks</td>
<td>Weekly and Annual Tank Inspection Forms (Appendix C and D or equivalent forms) STI Inspection Forms or Equivalent</td>
</tr>
</tbody>
</table>

**Daily Observations**

A Clean Harbors employee performs a complete walk-through of the facility each workday. This daily visual inspection involves, among other items, ensuring oil containers (tanks, totes and
drums) are free of leaks or damage and that storage areas are secure. Any leaks or potential problems will be corrected as soon as possible.

**Weekly Inspection**
Storage tanks, piping, pumps, oil containers, secondary containment and facility security will be formally inspected on a Weekly basis. The WIN System Weekly Tank Inspection form will be used. An example of the weekly inspection form is attached in Appendix C (equivalent forms may be developed and used). Records of the weekly inspections will be kept by Clean Harbors in the WIN system. Any deficiencies or problems will be reported immediately to Clean Harbors management. Deficiencies or problems are noted as a "fail" in the Win System inspection form. Once this happens, a Work Ticket for corrective action is automatically created. The Work Ticket is tracked until the corrective action is completed.

**Annual Inspection**
Storage tanks will be inspected on an annual basis with the use of the WIN System Annual Inspection form. An example of the Annual Tank Inspection form is in Appendix C. An equivalent form can also be used to document the annual inspection.

**As Necessary**
Storm Water Transfers. Before any water is removed from a secondary containment area the water will be inspected for any visible oil contamination. The person in charge of removing the water will complete a record of this inspection and transfer. A copy of the inspection form is included in Appendix E (an equivalent form may be used). This record will be kept by Clean Harbors.

Training Records. A record will be kept by Clean Harbors of all training relating to the SPCC plan. A copy of the log to record training events is included in Appendix F. Other appropriate training records such as outside training courses related to the SPCC plan should also be kept by Clean Harbors.

All records must be kept and maintained for a minimum period of three years.

**Integrity Testing**
The double-walled tanks are designed to provide secondary containment for the entire tank volume. The containment capacity of the outer tank is 122% of the inner storage tank volume. The double walled tanks are inspected weekly and annually for any leaks or spills, including checking the interstitial space. Because a leak from a tank would be readily detected within the interstitial space of a double-walled tank, and because of the small size of these tanks, required integrity testing of the double-walled tanks will be accomplished by weekly and annual tank inspections conducted by Clean Harbors. Also, in accordance with Clean Harbors “Tank Inspection Best Management Practice Document”, OS-15.0, the double walled tanks will be internally inspected by a qualified Steel Tank Institute (STI) or API inspector within 10 years (by July 2032) and then at least every 30 years thereafter. External tank inspections will be conducted at least every 20 years by a STI or API inspector.
Brittle-fracture analysis, in accordance with API 653, will not be required since the tanks at this facility are small shop-welded tanks (40 CFR Part 112.7(i)) and/or the shell thickness of the tanks at this facility is less than one-half inch. As discussed in the American Petroleum Institute (API) Standard 653 Tank Inspection, Repair, Alteration, and Reconstruction (API-653), brittle fracture is not a concern for tanks that have a shell thickness of less than one-half inch. This is the extent of the brittle fracture evaluation for the tanks at this facility.
3.8 **Personnel Training and Discharge Prevention Procedures (40 CFR 112.7(f))**

Clean Harbors management has instructed appropriate facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held for all facility personnel involved in oil operations. The briefings may be conducted by an operations manager or environmental staff and are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

**Personnel Training and Instruction, 40 CFC 112.7 (f)(1) and (3)**

New Clean Harbors personnel who will work at the Las Vegas facility will be trained so that they understand the contents of this SPCC plan. An outline of the new-hire training follows below. Appropriate Clean Harbors employees will receive annual review training of the SPCC plan. The same outline as that used for the new hire will be used for the review training.

Any time there is a spill event or failure, or if there are newly developed precautionary spill prevention measures to be put in place for the facility then all appropriate Clean Harbors employees will be informed. Any necessary training will be conducted in conjunction with the spill event or the new spill prevention measures.

The suggested SPCC Training Outline is as follows (alternative SPCC training programs developed by the company may also be utilized to meet training requirements):

**SPCC Training Outline**

The following outline is for training all new employees and is used as a guideline for annual SPCC training.

1. Introduction to the SPCC plan.
   a. Explain the purpose of the plan.
   b. Review contents of the plan.
   c. Discuss the facility areas included in the Clean Harbors SPCC plan.
   d. Review the emergency contacts for the facility.

2. Review the spill history of the site and explain the measures taken to prevent future occurrences. Discuss any recent discharge occurrences and review prevention measures to avoid a reoccurrence.

3. Review the potential for spills at the facility.
4. Discussion of the secondary containment and its purpose.

5. Review the storage containers.
   a. Define which containers are in service and in what service.

6. Discuss how transfer operations are done at the Clean Harbors facility.

7. Review the operation of oily water loading/unloading.

8. Train employees on how to conduct and complete SPCC Inspections and how to complete the Inspection forms.
   a. What to look for, i.e., leaks, oil stains, water in containment, oil in containment, valves improperly shut or open, etc.
   b. How to report problems.
   c. What to do with completed inspection forms.

9. Review the facility security and the employees’ responsibility as it relates to maintaining this security.

10. Review the SPCC spill reporting procedures and the company emergency response procedures.

11. Discuss any recently developed or implemented precautionary measures or procedures.

40 CFC 112.7 (f)(2) Designated Person
A person has been designated to be accountable for discharge prevention. This person will be responsible to report to management concerning SPCC compliance. The designated person accountable for spill prevention will be responsible to ensure SPCC training is conducted (see cover page for designated person).
3.9  Security (40 CFR 112.7(g))

The following security measures are in place:

3.9.1 Facility Access Control
The property has security walls and fencing to control access to the south side of the site. The office and warehouse areas are locked closed when no one is on site. There are also security cameras mounted on the south side of the office/warehouse building.

3.9.2 Flow valves locked/closed
Flow valves are normally locked closed except when in operation.

3.9.3 Starter controls locked
Truck pumps are used for transfers to and from the oily-water storage tanks. Pump controls are in the truck. Locking the pump controls is not applicable for these mobile pumps.

3.9.4 Pipeline loading/unloading connections securely capped
All connections, hoses, and pipelines are securely capped when not in service, including empty connections maintained as standby or extension apparatus. As applicable, out-of-service pipelines will be evacuated of their contents and blinded or capped. Such lines would also be marked or tagged at the transfer point to show the origin of the piping.

3.9.5 Lighting adequate to detect spills
Lights are located near the storage tanks. Other areas around storage tanks receive adequate illumination. Lighting is also adequate to detect spills during nighttime hours and to deter vandalism.
3.10 Tank Truck Loading/Unloading Requirements (40 CFR 112.7 (h))

3.10.1 Secondary Containment (40 CFR 112.7 (h)(1))
There are no loading/unloading racks at this facility. There is a designated oily-water loading/unloading area adjacent to the double-walled tanks. Transfers to/from the oily-water tanks is done with the use of truck pumps, hoses, and connections. A spill-containment pan is placed under truck connections during loading/unloading operations. It is anticipated that the delivery driver will detect a spill or problem and respond by shutting down the flow within 30 seconds. At 100 gpm loading/unloading, a 30 second spill would release about 50 gallons. This amount will be contained in the containment basin under the truck connections or in the poly-lined area around the tanks.

Secondary containment calculations are detailed in Appendix B

3.10.1.1 Unloading Procedures (40 CFR 112.7 (h)(2)(3))
The following requirements and procedures are in place for loading/unloading oily water at this Clean Harbors facility:

Loading/unloading procedures meet U.S. Department of Transportation (DOT) regulations. Clean Harbors requires all drivers to comply with DOT regulations in 49 CFR Part 177 and facility standard operating procedures. All drivers must be authorized by Clean Harbors to load/unload. The driver must be always present and attentive during loading/unloading.

Loading/unloading procedures are shown in Table 3.10

<table>
<thead>
<tr>
<th>Table 3.10. Truck Loading/Unloading Procedures</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Prior to Loading/Unloading</td>
</tr>
<tr>
<td>• Set parking brakes and chock tires.</td>
</tr>
<tr>
<td>• Do not allow drivers to remain in vehicles while performing loading or unloading.</td>
</tr>
<tr>
<td>• Clean nonessential equipment and objects from the loading area.</td>
</tr>
<tr>
<td>• Keep dome covers closed, except when unloading to allow tank to vent.</td>
</tr>
<tr>
<td>• Thoroughly examine vehicles to ensure closure of all out-flowing valves.</td>
</tr>
<tr>
<td>• Check and verify the receiving tank inventory.</td>
</tr>
<tr>
<td>• Compare receiving tank inventory against the planned transfer quantity to avoid overfilling.</td>
</tr>
<tr>
<td>2) During Loading/Unloading</td>
</tr>
<tr>
<td>• Begin flow slowly.</td>
</tr>
<tr>
<td>• Observe outlets during loading to detect potential leakage during transit.</td>
</tr>
<tr>
<td>• When filling a tank, the liquid level of the tank must be continuously monitored to ensure the tank is not overfilled.</td>
</tr>
<tr>
<td>• In the event that any leakage is observed, cease loading immediately and take corrective action.</td>
</tr>
</tbody>
</table>
3) After Loading/Unloading
- Check liquid levels for compartments by gauge and visual inspection.
- All loading hoses and valves are disengaged.
- Return all pumps, valves, and hoses to their out-of-service positions.
- Close all hatches tightly.
- Close internal safety valves.
- Check for leaks or drips from all connections. Correct any leaks before leaving the dock area.

3.10.2 Warning or barrier system for vehicles. 40 CFR 112.7 (h)(2)
A warning sign is posted in view of the tank-transfer connection to deter vehicular departure before complete disconnect of transfer lines has occurred.

3.10.3 Vehicles examined for lowermost drainage outlets before leaving. 40 CFR 112.7 (h)(3)
Upon completion of unloading operations, the lowermost drainage outlets are inspected for leaks. Observed leaks must be corrected before the vehicle leaves the unloading area.

3.11 Brittle Fracture Evaluation (40 CFR 112.7 (i))
Brittle-fracture analysis, in accordance with API 653, will not be required since the tanks at this facility are small shop-welded tanks (40 CFR Part 112.7(i)) and/or the shell thickness of the tanks at this facility is less than one-half inch. As discussed in the American Petroleum Institute (API) Standard 653 Tank Inspection, Repair, Alteration, and Reconstruction (API-653), brittle fracture is not a concern for tanks that have a shell thickness of less than one-half inch. This is the extent of the brittle fracture evaluation for the tanks at this facility.

3.12 Conformance with State and Local Applicable Requirements (40 CFR 112.7 (j))
This plan conforms with applicable State and Federal requirements, regulations and guidelines for effective discharge prevention and containment procedures associated with aboveground storage and handling of oil.

The State of Nevada requires that spills be reported no later than the end of the first working day of the release. A copy of the Nevada DEP Spill Reporting Form and instructions is attached in Appendix H.
Part 4 Discharge Prevention – SPCC Provisions for Onshore Facilities

4.1 Facility Drainage (40 CFR 112.8(b))

Storm water on the property flows south towards a retaining wall. At the retaining wall flow is east or west to the south corners of the property. Drainage from the SE corner is controlled by a normally closed valve that can be opened to drain clean storm water to the adjacent property. Drainage from the adjacent property is into the municipal storm drain system along East Cheyenne Ave. The distance from the Clean Harbors property to the municipal storm drains along East Cheyenne Ave. is about 660 feet. The municipal storm drain system flows into the Las Vegas Wash (located about 2.6 miles south of the Clean Harbors site). The Las Vegas Wash flows into Lake Las Vegas. Lake Las Vegas is located about 11 miles SE of the Clean Harbors property.

There are no systems in place to monitor discharged storm water.

4.2 Bulk Storage Containers (40 CFR 112.8(c))

4.2.1 Construction (40 CFR 112.8(c)(1))

Clean Harbors’ storage consists of aboveground steel tanks, 275-300-gallon totes, and 55-gallon drums. A list of tanks and containers, with corresponding container data, is attached in Appendix A.

Tank materials-of-construction are compatible with the tank contents. Steel tanks have exterior coatings that are kept in good condition. Tanks are regularly inspected as described in Section 3.7. Inspections occur and records are maintained under the direction of the designated person in charge of SPCC compliance (see cover page for designated person).

All AST tanks are subject to daily visual observations when a Clean Harbors person is at the site. Formal weekly and annual inspections are completed by Clean Harbors to help ensure tank and container integrity. Any discovered leaks or problems are immediately reported to management.

4.2.2 Secondary Containment (40 CFR 112.8(c)(2))

Secondary containment for tanks, drums and totes is detailed above in Section 3.5.

4.2.3 Drainage of Diked Areas (40 CFR 112.8(c)(3))

There are no drainage valves from the outside curbed concrete pads adjacent to the warehouse. The concrete pads on the west side of the property have normally plugged drainage conduits. Before draining water from these pads, the person draining the water must first inspect the water for oil or oil sheen. The form in Appendix E must be completed to document inspection of drained water.

4.2.4 Corrosion Protection (40 CFR 112.8(c)(4))

There are no underground storage tanks at this location. Aboveground tanks are set on poly liners.
4.2.5 Partially Buried Tanks (40 CFR 112.8(c)(5))
There are no buried or partially buried storage tanks located at this Clean Harbors facility.

4.2.6 Inspections and Test (40 CFR 112.8(c)(6))
Tanks are inspected as detailed above in Section 3.7.

4.2.7 Heating Coils (40 CFR 112.8(c)(7))
There are no heated tanks or heating systems at this facility.

4.2.8 Overfill Protection (40 CFR 112.8(c)(8))
The oily-water storage tanks have float gauges and/or stick gauges. These gauges will be read prior to putting material in a tank to help avoid spills due to overfilling. When filling tanks the gauges will be closely monitored to prevent overfilling the tanks.

4.2.9 Effluent Treatment Facilities (40 CFR 112.8(c)(9))
This Clean Harbors site does not have monitoring systems or effluent treatment for water that drains from the property.

4.2.10 Visible Discharges (40 CFR 112.8(c)(10))
Daily observations include visual monitoring of tanks and drums. Visible discharges from any container or appurtenance – including seams, gaskets, valves, and bolts – are corrected upon discovery. Spilled oil is promptly removed from containment areas. If disposal of spilled oil is necessary, the oil is disposed of according to the waste disposal method described in Part 5.3 of this plan.

4.2.11 Mobile and Portable Containers (40 CFR 112.8(c)(11))
Drums and totes are considered portable containers. Secondary containment for storage and handling of drums and totes is described in this SPCC plan.

The oily-water tanks are portable only when connected to a tractor/truck unit. Since these tanks are set with no motive ability, they are not considered portable.
4.3 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))

4.3.1 Buried Piping
There are no underground pipes at this facility.

4.3.2 Not in Service and Standby Connections
Clean Harbors operates with minimal aboveground pipe/hose terminal connections. All loading/unloading-area terminal valves are kept in the closed position when not in use. If the facility, or any part of the facility, were to be temporarily taken out of service, valve ends and other appropriate locations would be temporarily blind-flanged, capped or plugged. These connections and terminals would remain capped until such time as they were brought back into service. Such lines would also be marked or tagged at the transfer point to show the origin of the piping.

4.3.3 Pipe Supports
Fixed pipe supports are minimal at this facility, but where they exist, they appear to be adequately designed to allow for expansion and contraction, minimize corrosion, and provide adequate support.

4.3.4 Aboveground Equipment and Piping Inspections
Aboveground valves and pipelines are subject to regular inspections. Items subject to inspections include, but are not limited to piping, valves, pumps, pipe joints, flanges, pipeline supports, and filters. Daily observations are made whenever a Clean Harbors person is at the site. Weekly inspections are documented using forms included in Appendix C (or equivalent forms).

4.3.5 Protection of Aboveground Piping and Equipment
Oily-water tanks, piping, and equipment are in poly-lined containment areas. The double wall design helps protect the inner storage tank from vehicle damage. In the warehouse drums are exposed to forklift traffic. Proper container spacing is utilized to help protect drums from vehicle damage.
Part 5 Discharge Response (40 CFR 112.7 (a)(3)(iv))

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and federal laws. Immediate action must be taken to control, contain, and recover discharged product. This facility does not meet the standards requiring a Facility Response Plan per 40 CFR 112.20 (see Certification of the Applicability of the Substantial Harm Criteria Checklist in Appendix G). In the event of a major discharge or release these procedures, along with appropriate reporting procedures of Section 3.3 will be followed.

In general, the following steps are taken:
1. Eliminate potential spark sources
2. If possible and safe to do so, identify and shut down source of the discharge to stop the flow
3. Contain the discharge with sorbents, berms, trenches, sandbags, or other material
4. Contact the Facility Manager or his/her alternate
5. Contact regulatory authorities and the response organization
6. Collect and dispose of recovered products according to regulation

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either “minor” or “major,” depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in Appendix H.

5.1 Response to a Minor Discharge

A “minor” discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

a. The quantity of product discharged is small (e.g., may involve less than 25 gallons of oil)
b. Discharged material is easily stopped and controlled at the time of the discharge
c. Discharge is localized near the source
d. Discharged material is not likely to reach water
e. There is little risk to human health or safety
f. There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by Clean Harbors personnel. The following guidelines apply:

- Immediately notify the Facility Manager.
- Under the direction of the Facility Manager, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The Facility Manager will document the discharge (see Section 2.2.1.B above).
• If the discharge involves more than 25 gallons of oil, the Facility Manager will contact the Clean Harbors Sr. Environmental Manager who should then call regulatory authorities to report the release (see section 5.4).

5.2 Response to a Major Discharge

A “major” discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

• The discharge is large enough to spread beyond the immediate discharge area;
• The discharged material enters water;
• The discharge requires special equipment or training to clean up;
• The discharged material poses a hazard to human health or safety; or
• There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

1. All workers must immediately evacuate the discharge site and move to areas at a safe distance from the discharge.
2. The Facility Manager, or the senior on-site person notifies the Sr. Environmental Manager of the discharge. The Sr. Environmental Manager has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge.
3. Any able employee must call for medical assistance if workers are injured or in case of a fire.
4. The Sr. Environmental Manager must immediately contact the National Response Center (800-424-8802) and the Nevada Department of Environmental Protection 24-hour communications center (888-331-6337).
5. The Sr. Environmental Manager must document the call. The form in Appendix H can be used for documentation.
6. The Clean Harbors Sr. Environmental Manager coordinates cleanup and obtains assistance from a cleanup contractor(s) or other response organization as necessary.

If the Facility Manager is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for contacting the Sr. Environmental Manager and as directed, coordinating response activities.

5.3 Waste Disposal (40 CFR 112.7 (a)(3)(v))

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The facility manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler.

Wastes resulting from a major discharge response will be removed and disposed of by a cleanup contractor.
5.4 Discharge Notification

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

For Nevada
The State of Nevada requires that spills be reported no later than the end of the first working day of the release. A copy of the Nevada DEP Spill Reporting Form and instructions is attached in Appendix H.

Discharge notification procedures are further detailed above in Section 3.3 and Section 5.2 of this plan.

5.5 Cleanup Contractors and Equipment Suppliers

Due to the layout and topography of the site it is believed an oil discharge outside of secondary containment will be contained on the property; however, appropriate cleanup will be required any time oil is spilled. Typically, this will involve coordination by the facility manager who will direct the cleanup work.

Clean Harbors Field Services operates at this site and is equipped and involved in spill cleanup activities. Clean Harbors has the necessary equipment to respond to a discharge of oil that affects the waterways or adjoining shorelines, including floating booms and oil skimmers. No outside contractors are necessary.
Appendices

Appendix A  Storage Tank Data
Appendix B  Secondary Containment Calculations
Appendix C  Weekly Inspection Form (example)
Appendix D  Annual Inspection Form (example)
Appendix E  Drainage Discharge Report Form
Appendix F  SPCC Training/Meeting Form
Appendix G  Certification of the Applicability of the Substantial Harm Criteria Checklist
Appendix H  Emergency Contacts, Phone Numbers and Discharge Notification Form
Appendix I  Site Map, Site Plan and SPCC Drawings
Appendix A
Storage Tank Data
### Storage Tank Data

<table>
<thead>
<tr>
<th>Tank ID</th>
<th>Capacity, gallons</th>
<th>Gal/ft</th>
<th>Service</th>
<th>Type</th>
<th>Diameter/width, ft</th>
<th>Height, ft</th>
<th>Length, ft</th>
<th>Safe Fill, ft</th>
<th>Year Built</th>
<th>Insulated</th>
<th>Heated</th>
<th>Drums</th>
<th>55</th>
<th>misc.</th>
<th>Steel and Poly Drums</th>
<th>no</th>
<th>no</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>18,430</td>
<td>varies</td>
<td>Oily Water</td>
<td>DW-Steel Tank</td>
<td>8</td>
<td>48</td>
<td>7.9</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>18,430</td>
<td>varies</td>
<td>Oily Water</td>
<td>DW-Steel Tank</td>
<td>8</td>
<td>48</td>
<td>7.9</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td>no</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Drums</td>
<td>55</td>
<td></td>
<td>misc.</td>
<td>Steel and Poly Drums</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>no</td>
<td>no</td>
<td>no</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totes</td>
<td>275-330</td>
<td></td>
<td>misc.</td>
<td>Steel and Poly Totes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>no</td>
<td>no</td>
<td>no</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix B
Secondary Containment Calculations
Containment Area: Oily-Water Double-Walled Tanks

Oily-water Tanks 1 and 2 are double-walled steel tanks. The outer wall provides secondary containment for the inner storage tank (the outer tank capacity is 22,500 gallons and the inner storage tank capacity is 18,340 gallons). A leak from the inner tank can be detected within the interstitial space between the inner and outer walls.

Containment: Loading/Unloading Area

The loading/unloading area is adjacent to the Oily-Water Tanks. It is anticipated that a spill or release during loading/unloading operations will be responded to by the driver or on-site personnel within 30 seconds. The estimated amount of oil that could be released in a 30 second spill from loading/unloading operations is as follows:

- Loading/Unloading Rate, gpm: 100
- Response, seconds: 30
- Spilled amount, gal.: 50

This amount of oil will be contained in the spill containment basin set below the truck connections or within the poly-lined containment area around the tanks.

Approximate capacity of truck loading containment basin and poly-lined containment area around oily water tanks:

<table>
<thead>
<tr>
<th>Description</th>
<th>Truck Basin</th>
<th>Poly-Lined</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dia., ft</td>
<td>8</td>
<td>12</td>
</tr>
<tr>
<td>Width, ft</td>
<td>50</td>
<td></td>
</tr>
<tr>
<td>Depth, in</td>
<td>12</td>
<td>11</td>
</tr>
<tr>
<td>Length, ft</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>Capacity, gallons</td>
<td>376</td>
<td>4,114</td>
</tr>
</tbody>
</table>

* Precipitation information is from Western Regional Climate Center data for North Las Vegas.
Clean Harbors - Las Vegas Facility  
Secondary Containment Calculations

**Containment Area: Vacuum Truck Pad**

Tanks included in this area: Vacuum Truck Tank, Totes

Approximate Dimensions of Containment Area:

<table>
<thead>
<tr>
<th>Tank Capacity, gal</th>
<th>Largest Tank, Vacuum Truck</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,940</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Length, ft</th>
<th>Width, ft</th>
<th>Height, in</th>
</tr>
</thead>
<tbody>
<tr>
<td>39</td>
<td>30</td>
<td>4</td>
</tr>
</tbody>
</table>

Estimated Displacement Calculations:

<table>
<thead>
<tr>
<th>Tank</th>
<th>Displaced, gal</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>misc.</td>
<td>5</td>
</tr>
<tr>
<td>totes (4)</td>
<td>110</td>
</tr>
</tbody>
</table>

Capacity: 2,885 gallons

\[
\text{containment capacity} = \text{Length(ft)} \times \text{Width (ft)} \times \frac{\text{h(in)}}{12\text{(in/ft)}} \times 7.4805 \text{ gal/ft}^3
\]

Precipitation Allowance:

25-year, 24-hour amount*, in. 1.3 in.

Precipitation Amount: 938 gal.

Total Available Secondary Containment:

Capacity - Precipitation - Displacement = Available Containment = 1,873 gal.

Excess capacity = Available Containment - Tank Capacity = 1,067 gal.

Precipitation must be routinely managed to insure maximum containment capacity when a Vacuum Truck is parked on this pad. Because this pad is not capable of containing a fully loaded vacuum truck, only partially filled trucks should be allowed to park here. Trucks with more than 1,873 gallons should be unloaded to the oily-water tank(s).

**Containment Area: Drum Containment on South Side (by Vac Truck Pad)**

Approximate Dimensions of Containment Area: curbed concrete pad

<table>
<thead>
<tr>
<th>Tank Capacity, gal</th>
<th>Largest Container, 55 gal. drum</th>
</tr>
</thead>
<tbody>
<tr>
<td>55</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Length, ft</th>
<th>Width, ft</th>
<th>Height, in</th>
</tr>
</thead>
<tbody>
<tr>
<td>24.67</td>
<td>20.67</td>
<td>2</td>
</tr>
</tbody>
</table>

Estimated Displacement Calculations:

<table>
<thead>
<tr>
<th>Item</th>
<th>Displaced, gal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drums</td>
<td>20 67</td>
</tr>
<tr>
<td>Misc.</td>
<td>10 2 est.</td>
</tr>
</tbody>
</table>

Capacity: 636 gal.

\[
\text{containment capacity} = \text{Length(ft)} \times \text{Width (ft)} \times \frac{\text{h(in)}}{12\text{(in/ft)}} \times 7.4805 \text{ gal/ft}^3
\]

Precipitation Allowance:

25-year, 24-hour amount*, in. 1.3 in.

Precipitation Amount: 413 gal.

Total Available Secondary Containment:

Capacity - Precipitation - Displacement = Available Containment = 154 gal.

Excess capacity = Available Containment - Tank Capacity = 99 gal.

* Precipitation information is from Western Regional Climate Center data for North Las Vegas
Clean Harbors - Las Vegas Facility
Secondary Containment Calculations

**Containment Area: Drum Containment on South Side Of Warehouse (by office)**

<table>
<thead>
<tr>
<th>Approximate Dimensions of Containment Area:</th>
<th>Largest Container, 55 gal. drum</th>
</tr>
</thead>
<tbody>
<tr>
<td>curbed concrete pad</td>
<td>Tank Capacity, gal 55</td>
</tr>
<tr>
<td>Length, ft</td>
<td>Estimated Displacement Calculations</td>
</tr>
<tr>
<td>Width, ft</td>
<td>Item</td>
</tr>
<tr>
<td>Height, in</td>
<td>Drums</td>
</tr>
<tr>
<td>Capacity</td>
<td>Misc.</td>
</tr>
</tbody>
</table>

**Estimated Displacement Calculations**

<table>
<thead>
<tr>
<th>Item</th>
<th>gal/ft</th>
<th>Displaced, gal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drums</td>
<td>20</td>
<td>83</td>
</tr>
<tr>
<td>Misc.</td>
<td>10</td>
<td>2</td>
</tr>
</tbody>
</table>

\[
\text{Containment capacity} = \text{Length (ft)} \times \text{Width (ft)} \times \frac{\text{h (in)}}{12 \text{(in/ft)}} \times 7.4805 \text{gal/ft}^3
\]

**Precipitation Allowance:**

25-year, 24-hour amount*, in. 1.3 in.

**Precipitation Amount:** 278 gal.

**Total Available Secondary Containment:**

\[
\text{Capacity} - \text{Precipitation} - \text{Displacement} = \text{Available Containment} = 171 \text{ gal.}
\]

Excess capacity = Available Containment - Tank Capacity = 116 gal.

---

**Containment Area: Drum Containment on South Side Of Warehouse (middle warehouse)**

<table>
<thead>
<tr>
<th>Approximate Dimensions of Containment Area:</th>
<th>Largest Container, 55 gal. drum</th>
</tr>
</thead>
<tbody>
<tr>
<td>curbed concrete pad</td>
<td>Tank Capacity, gal 55</td>
</tr>
<tr>
<td>Length, ft</td>
<td>Estimated Displacement Calculations</td>
</tr>
<tr>
<td>Width, ft</td>
<td>Item</td>
</tr>
<tr>
<td>Height, in</td>
<td>Drums</td>
</tr>
<tr>
<td>Capacity</td>
<td>Misc.</td>
</tr>
</tbody>
</table>

**Estimated Displacement Calculations**

<table>
<thead>
<tr>
<th>Item</th>
<th>gal/ft</th>
<th>Displaced, gal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drums</td>
<td>20</td>
<td>83</td>
</tr>
<tr>
<td>Misc.</td>
<td>10</td>
<td>2</td>
</tr>
</tbody>
</table>

\[
\text{Containment capacity} = \text{Length (ft)} \times \text{Width (ft)} \times \frac{\text{h (in)}}{12 \text{(in/ft)}} \times 7.4805 \text{gal/ft}^3
\]

**Precipitation Allowance:**

25-year, 24-hour amount*, in. 1.3 in.

**Precipitation Amount:** 397 gal.

**Total Available Secondary Containment:**

\[
\text{Capacity} - \text{Precipitation} - \text{Displacement} = \text{Available Containment} = 281 \text{ gal.}
\]

Excess capacity = Available Containment - Tank Capacity = 226 gal.

---

* Precipitation information is from Western Regional Climate Center data for North Las Vegas
Clean Harbors - Las Vegas Facility  
Secondary Containment Calculations

Containment Area: Drum Containment on South Side Of Warehouse (east warehouse)

Approximate Dimensions of Containment Area:
- Largest Container, 55 gal. drum
- Tank Capacity, gal 55

<table>
<thead>
<tr>
<th>Item</th>
<th>gal/ft</th>
<th>Displaced, gal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drums</td>
<td>20</td>
<td>83 est for 20 drums</td>
</tr>
<tr>
<td>Misc.</td>
<td>10</td>
<td>2 est.</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>85</td>
</tr>
</tbody>
</table>

Estimated Displacement Calculations

Precipitation Allowance:
- 25-year, 24-hour amount*, in. 1.3 in.
- Precipitation Amount: 407 gal.

Total Available Secondary Containment:

Capacity - Precipitation - Displacement = Available Containment = 290 gal.

Excess capacity = Available Containment - Tank Capacity = 235 gal.

Containment Area: Poly-lined basin under Oily-Water Tanks

Approximate Dimensions of Containment Area:
- Largest Container
- Tank Capacity, gal

<table>
<thead>
<tr>
<th>Item</th>
<th>gal/ft</th>
<th>Displaced, gal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Frac Tank</td>
<td>1800</td>
<td>1,650</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>1,650</td>
</tr>
</tbody>
</table>

Precipitation Allowance:
- 25-year, 24-hour amount*, in. 1.3 in.
- Precipitation Amount: 486 gal.

Total Available Secondary Containment:

Capacity - Precipitation - Displacement = Available Containment = 1,978 gal.

* Precipitation information is from Western Regional Climate Center data for North Las Vegas
Appendix C
Example of Weekly Inspection Form
CO Weekly SPCC Inspection

Form Code: 937

<table>
<thead>
<tr>
<th>Compliance Header</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspector Name</td>
</tr>
<tr>
<td>Area of Inspection</td>
</tr>
<tr>
<td>Inspection Date and Time</td>
</tr>
</tbody>
</table>

**Weekly SPCC Inspection Instructions**

Fully explain all items that need immediate attention in the comment section after each question that fails. Include the location of the deficiency and the corrective action necessary.

**A. Drainage/Containment**

<table>
<thead>
<tr>
<th>Question</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any noticeable sheen on run off?</td>
<td></td>
</tr>
<tr>
<td>Containment area drainage valves closed and locked?</td>
<td></td>
</tr>
<tr>
<td>No visible oil sheen in containment area?</td>
<td></td>
</tr>
<tr>
<td>No standing water in containment area or sump?</td>
<td></td>
</tr>
<tr>
<td>Containment floor and walls free of cracks?</td>
<td></td>
</tr>
<tr>
<td>Containment free of weeds (inside and out)?</td>
<td></td>
</tr>
<tr>
<td>Drip pans not overflowing, properly labeled (why do we have drip pans in tank farm?)</td>
<td></td>
</tr>
</tbody>
</table>

**B. Pipelines**

<table>
<thead>
<tr>
<th>Question</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>No sign of corrosion or other damage to pipes and or supports?</td>
<td></td>
</tr>
<tr>
<td>Buried pipes are not exposed (if applicable)?</td>
<td></td>
</tr>
<tr>
<td>Out of Service Pipes capped?</td>
<td></td>
</tr>
<tr>
<td>Signs and barriers to protect pipelines from vehicles are in place and visible?</td>
<td></td>
</tr>
<tr>
<td>No leaks at valves, flanges or other fittings (check EACH connection)?</td>
<td></td>
</tr>
</tbody>
</table>

**C. ASTs**

<table>
<thead>
<tr>
<th>Question</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tank surfaces checked for signs of leakage?</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Answer</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Tank condition good (no rusting, corrosion, pitting)?</td>
<td></td>
</tr>
<tr>
<td>Bolts, rivets, and or seams are not damaged?</td>
<td></td>
</tr>
<tr>
<td>Tank foundation intact?</td>
<td></td>
</tr>
<tr>
<td>Level gauges and alarms working properly?</td>
<td></td>
</tr>
<tr>
<td>Vents not obstructed?</td>
<td></td>
</tr>
<tr>
<td>Manways, flanges, and gaskets free from leaks?</td>
<td></td>
</tr>
<tr>
<td><strong>D. Truck Loading/Unloading Area</strong></td>
<td></td>
</tr>
<tr>
<td>No standing water in rack area?</td>
<td></td>
</tr>
<tr>
<td>No leaks in hoses, stored with caps in place?</td>
<td></td>
</tr>
<tr>
<td>Drip pans not overflowing, properly labeled?</td>
<td></td>
</tr>
<tr>
<td>Catch basins free of contamination?</td>
<td></td>
</tr>
<tr>
<td>Containment curbing or trenches intact?</td>
<td></td>
</tr>
<tr>
<td>Connects are capped or blank flanged?</td>
<td></td>
</tr>
<tr>
<td>Eye wash station available and functioning and stocked?</td>
<td></td>
</tr>
<tr>
<td><strong>E. Security</strong></td>
<td></td>
</tr>
<tr>
<td>Fence and gates intact?</td>
<td></td>
</tr>
<tr>
<td>Access doors and overhead doors have locks?</td>
<td></td>
</tr>
<tr>
<td>AST valves locked when not in use?</td>
<td></td>
</tr>
<tr>
<td>Starter controls for pumps locked when not in use?</td>
<td></td>
</tr>
<tr>
<td>Lighting is sufficient and functioning properly?</td>
<td></td>
</tr>
<tr>
<td><strong>Compliance Footer</strong></td>
<td></td>
</tr>
<tr>
<td>Inspector Signature</td>
<td></td>
</tr>
<tr>
<td>Attach Photo</td>
<td></td>
</tr>
<tr>
<td>Inspection Overall Assessment</td>
<td></td>
</tr>
</tbody>
</table>
Appendix D
Example of Annual Inspection Form
CO Annual Inspection Checklist

Form Code: 975

<table>
<thead>
<tr>
<th>Compliance Header</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspector Name</td>
</tr>
<tr>
<td>Area of Inspection</td>
</tr>
<tr>
<td>Inspection Date and Time</td>
</tr>
</tbody>
</table>

CO Annual Inspection Checklist Instructions

Non-conforming items important to the tank or containment integrity require evaluation. Note the non-conformance and corresponding corrective action needed in the comment section.

1.0 Tank Containment

1.1 Containment structure in satisfactory condition?
1.2 Drainage pipes/valves fit for continued service?

2.0 Tank Foundation and Supports

2.1 Evidence of Tank settlement or foundation washout?
2.2 Cracking or spalling of concrete pad or ring wall?
2.3 Tank supports in satisfactory condition?
2.4 Water able to drain away from tank?
2.5 Grounding strap secured and in good condition?

3.0 Tank External Coating

3.1 Evidence of paint failure?

4.0 Tank Shell/Heads

4.1 Noticeable shell/head distortions, buckling, denting or bulging?
4.2 Evidence of shell/head corrosion or cracking?

5.0 Tank Manways, Piping and Equipment within Secondary Containment
<table>
<thead>
<tr>
<th>5.1 Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>6.0 Tank Roof</strong></td>
</tr>
<tr>
<td>6.1 Standing water on roof?</td>
</tr>
<tr>
<td>6.2 Evidence of coating, cracking, crazing, peeling, blistering?</td>
</tr>
<tr>
<td>6.3 Holes in roof?</td>
</tr>
<tr>
<td><strong>7.0 Venting</strong></td>
</tr>
<tr>
<td>7.1 Vents free of obstructions?</td>
</tr>
<tr>
<td>7.2 Emergency vent operable? Lift as required?</td>
</tr>
<tr>
<td><strong>8.0 Insulated Tanks</strong></td>
</tr>
<tr>
<td>8.1 Insulation missing?</td>
</tr>
<tr>
<td>8.2 Are there noticable areas of moisture on the insulation?</td>
</tr>
<tr>
<td>8.3 Mold on insulation?</td>
</tr>
<tr>
<td>8.4 Insulation exhibiting damage?</td>
</tr>
<tr>
<td>8.5 Is the insulation sufficiently protected from water intrusion?</td>
</tr>
<tr>
<td><strong>9.0 Level and Overfill Prevention Instrumentation of Shop Fabricated Tanks</strong></td>
</tr>
<tr>
<td>9.1 Has the tank liquid level sensing device been tested to ensure proper operation?</td>
</tr>
<tr>
<td>9.2 Does the tank liquid level sensing device operate as required?</td>
</tr>
<tr>
<td>9.3 Are overfill prevention devices in proper working condition?</td>
</tr>
<tr>
<td><strong>10.0 Electrical Equipment</strong></td>
</tr>
<tr>
<td>10.1 Are tank grounding lines in good condition?</td>
</tr>
<tr>
<td>10.2 Is electrical wiring for control boxes/lights in good condition?</td>
</tr>
<tr>
<td><strong>Compliance Footer</strong></td>
</tr>
<tr>
<td>Inspector Signature</td>
</tr>
<tr>
<td>Attach Photo</td>
</tr>
</tbody>
</table>
Inspection Overall Assessment
Appendix E
Drainage Discharge Report Form
Facility Storm Water Transfer Record

Any time water is manually transferred from a secondary containment area associated with the facility a record should be kept on the form below. If there is visible oil on the storm water, management should be notified before any transfer is made.

<table>
<thead>
<tr>
<th>Date</th>
<th>Containment Area</th>
<th>Visible Oil (y/n)</th>
<th>Destination</th>
<th>Operator</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/15/2022</td>
<td>Vacuum Truck Pad</td>
<td>N</td>
<td>Vac Truck</td>
<td>BZ</td>
<td>Collected about 100 gallons. Will be pumped to the oily water tank(s).</td>
</tr>
</tbody>
</table>

Shaded line above is example only. Applicable Storm Water Pollution Prevention measures must be followed.
Appendix F
SPCC Training/Meeting Form
SPCC TRAINING/MEETING RECORD

Conducted by: ____________________________  Date: ________________

Attendees: ____________________________

SPCC Elements:

☐ Inspections (Type, Frequency)  ☐ Facility Storage (Quantity, Locations)
☐ Drainage  ☐ Spill Control Procedures
☐ Site Security  ☐ Spill Control Equipment
☐ Bulk Transfer Operations  ☐ Fueling Operations
☐ Record Keeping  ☐ Housekeeping
☐ Equipment Maintenance  ☐ Emergency Contacts

Spill Response Drill Conducted?  ☐ Yes  ☐ No

Scenario Description: __________________________________________________________

__________________________________________________

__________________________________________________

__________________________________________________

Facility Management Approval: ____________________________
Appendix G
Certification of the Applicability of the Substantial Harm Criteria Checklist
CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: Clean Harbors – Las Vegas Facility

FACILITY ADDRESS: 4435 E. Colton Ave. Suite 101, Las Vegas, NV 89115

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gal.?

☐ Yes ☒ No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gal., and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

☐ Yes ☒ No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gal., and is the facility located at a distance (as calculated using the formula in Attachment C-III, Attachment C, 40 CFR Part 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Attachment E, 40 CFR Part 112 for availability) and the applicable Area Contingency Plan.

☐ Yes ☒ No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gal., and is the facility located at a distance (as calculated using the appropriate formula (Attachment C-III, Attachment C, 40 CFR Part 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

☐ Yes ☒ No

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gal. and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gal. within the last 5 years?

☐ Yes ☒ No

CERTIFICATION

I certify that, under penalty of law, I have personally examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

______________________________________         _________________________________
Name (please type or print)                     Signature

______________________________________
Title

___________________________
Date
Appendix H
Emergency Contacts and Phone Numbers

William C. Roberts (Primary SPCC Contact)  702-758-6019 cell
Facility Operations Supervisor  702-396-4148 office

Nick Culian (Alternate SPCC Contact)  530-636-2632 cell
Sr. Environmental Compliance Manager

U. S. Coast Guard, Washington, D.C.  800-424-8802
National Response Center, 24-hr.  202-267-2675

State Environmental Protection Agency:
Nevada Department of Environmental Protection
333 W. Nye Lane, Room 138
Carson City, Nevada 89706-0851
Spill Response 24-hour communications center:  888-331-6337
Outside of Nevada:  775-687-9485

EPA Region 9  866-372-9378
24-Hour Emergency Response Center

North Las Vegas Fire Department, emergency  911
702-633-1102

Police, emergency  911

Medical Emergency  911

Clean Harbors Field Services  800-645-8265
Appendix H
Discharge Notification Form
Part A: Discharge Information

General information when reporting a spill to outside authorities:

Name: Clean Harbors - Las Vegas Facility
Address: 4435 E. Colton Ave. Suite 101
         Las Vegas, NV 89115
Telephone: 702-396-4148

Owner/Operator: Clean Harbors, Inc.
                42 Longwater Drive
                Norwell, MA 02061-9149
                781-792-5500

Primary Contact: William C. Roberts
                 Office: 702-396-4148
                 Cell: 702-758-6019
Alternate Contacts: Cell Office
                  Nick Culian  530-636-2632

Type of oil discharged: Discharge Date and Time:

Quantity released (gal.): Discovery Date and Time:

Quantity released to a water body (gal.): Discharge Duration:

Location/Source of release:

Actions taken to stop, remove, and mitigate impacts of the discharge:

Affected Media:
☐ Air
☐ Water
☐ Soil
☐ Storm water sewer / POTW
☐ Dike or berm
☐ Other: ________________________________

Notification Person: Telephone Contact:
Business:
24-hr:

Nature of discharges, environmental/health effects, and damages:

Injuries, fatalities or evacuation required?
### Part B: Notification Checklist

<table>
<thead>
<tr>
<th>Discharge in any amount</th>
<th>Date/Time</th>
<th>Name of person receiving call</th>
</tr>
</thead>
<tbody>
<tr>
<td>William C. Roberts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office: 702-396-4148</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cell: 702-758-6019</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Discharge in amount exceeding 25 gallons and not affecting a waterbody or groundwater</th>
<th>Date/Time</th>
<th>Name of person receiving call</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nevada Department of Environmental Protection (NDEP)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>888-331-6337</td>
<td></td>
<td></td>
</tr>
<tr>
<td>775-687-9485</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| North Las Vegas Fire Department                                                     |           |                              |
| 702-633-1102                                                                        |           |                              |

<table>
<thead>
<tr>
<th>Discharge in any amount and affecting (or threatening to affect) a waterbody</th>
<th>Date/Time</th>
<th>Name of person receiving call</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Response Center (NRC)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>800-424-8802</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Nevada Department of Environmental Protection (NDEP)                                 |           |                              |
| 888-331-6337                                                                        |           |                              |
| 775-687-9485                                                                        |           |                              |

| North Las Vegas Fire Department                                                     |           |                              |
| 702-633-1102                                                                        |           |                              |

| EPA Region 9                                                                         |           |                              |
| 866-372-9378                                                                        |           |                              |
Appendix H
NDEP Spill Reporting Form and Instructions

The following is from NDEP’s Spill Reporting Website:


Report a Spill
Use this form to report what appears to you as a possible violation of environmental law and regulations. Information you submit will be forwarded to enforcement personnel or to the appropriate regulatory authority. The reporter always has the right to remain anonymous. All reports are handled with the same level of seriousness.

If this spill
Involves any amount of a hazardous substance released to surface water;
Threatens a vulnerable source as defined by NAC 445A.3459; or
Is a quantity equal to or greater than that which is required to be reported to the National Response Center (40 CFR Part 302)
As soon as practicable, call: Phone: 1-888-331-6337

If the spill meets the following criteria, please complete the form below within 1 working day:
Released to the soil or other surfaces of land in a quantity greater than 25 gallons or 200 pounds;
Discovered in at least 3 cubic yards of soil during any subsurface excavation;
Discovered in or on ground water; or
A confirmed release from an underground storage tank.

For information regarding State reporting requirements, when to call, who to call, or information on data, call: NDEP Bureau of Corrective Actions (775) 687 – 9368.
Appendix I
Site Map, Site Plan and SPCC Drawings
OTHER SITE-SPECIFIC APPROVALS/PERMITS
Am I in a Flood Zone?

Important Flood Insurance Information

This parcel IS NOT in a 100-year flood zone.

Parcel 14008401016
Owner GLOBAL COMMERCIAL HOLDINGS L L C
Address 4435 COLTON
Entity Clark County
Contact 702-455-4600
Flood Zone This parcel IS NOT in a 100-year flood zone.
FIRM Panel View FIRM Panel (2177)
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/23/2021 at 2:34 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmoldernized areas cannot be used for regulatory purposes.