NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management Program

Hazardous Waste: Complaint( ) LDF( ) TSF( ) GEN(X) KG( ) SQ( ) TRA( ) UOM( ) UOB( ) NOT A GEN( )
Solid Waste: Complaint( ) SLF( ) TRF( ) ILF( ) CDL( ) HHW( ) OBS( ) UOS( ) WTT( ) WTP( ) WTM( ) YWC( ) MED( )

TO: CMS Energy / Panhandle Eastern Pipe Line (Facility Name) — 11/26/01 (Date)

985 Road 90 (Address) — Olpe (City) — KS (State) — 66865 (Zip Code)

EPA Identification No.: KSD984972937

Solid Waste Permit No.:

This inspection was conducted to determine compliance with the state and federal solid and hazardous waste statutes and regulations.

☑ **Violations As Follows** ☐ **No Violations Identified**

	Citation	Description of Violation
7)	KAR 28-31-4(g)(4)	Contingency plan does not describe arrangements in accordance with 40 CFR 265.52(c)
8)	KAR 28-31-4(g)(4)	Contingency plan does not include brief outline of the capabilities of emergency equipment
9)	KAR 28-31-4(g)(4)	Contingency plan does not include evacuation routes
10)	KAR 28-31-4(c)(1)	Inaccurate notification
11)	KAR 28-31-4(g)(4)	Failure to maintain written job descriptions

☐ **Other Comments/Concerns:**

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. **Your facility must submit in writing within** 30 **days of receipt of this notice a description of all corrective actions taken.** ~~and/or a schedule for completion of necessary corrective actions to be taken.~~ Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:
Victoria S. O'Brien
Kansas Department of Health and Environment
Bureau of District Operation
Waste Management Programs
1500 West 7th Street
Chanute, Kansas 66720

R00403338
RCRA RECORDS CENTER

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (~~316~~ 620) 431-2390 or Bureau of Waste Management in the Topeka Office at (~~913~~ 785) 296-1604.

This Notice was prepared by

Victoria S. O'Brien

Date 11/26/01

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: Tom Jenkins

Signature: [signature]

Title: Area Supervisor

Date: 11/26/01

COPIES: White-Facility; Yellow-Bureau of Waste Management; Blue-District

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☒ **Violations As Follows** ☐ **No Violations Identified**

	Citation	Description of Violation
(NT 1)	KAR 28-31-4(e)(4)	Failure to have placards to per transporter
(NT 2)	KAR 28-31-4(d)	Failure to use correct generator name and/or address on dine manifests
(LB 3)	KAR 28-31-14	Failure to ~~use~~ include manifest number on four ~~manifests~~ LDR forms
(K 4)	KAR 28-31-4(g)(4)	Failure to follow written inspection schedule for emergency equipment
(K 5)	KAR 28-31-4(a)(4)	Failure to familiarize local hospitals in accordance with 40 CFR 265.37(a)(4)
(K 6)	KAR 28-31-4(a)(4)	Failure to describe emergency actions for fires involving hazardous waste.

☐ **Other Comments/Concerns:**
* Facility is actually a KS Generator but had notified as and wanted to be (per corporate) inspected as an EPA Generator

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This Notice was prepared by

Victoria S. O'Brien

Date 11 / 26 / 01

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: TOM JENKINS

Signature: [illegible]

Title: Area Supervisor

Date: 11 / 26 / 01

COPIES: White-Facility; Yellow-Bureau of Waste Management; Blue-District

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
1000 SW JACKSON, SUITE 320, TOPEKA, KANSAS 66612-1366

HAZARDOUS WASTE GENERATOR/TRANSPORTER COMPLIANCE INSPECTION CHECKLIST

General [X] Routine [] Complaint

EPA ID KSD 984 972 737 Time 10:45 a.m. Date November 26, 2001

Facility Name CMS Energy/Panhandle Eastern Pipeline District Southeast

Street 985 Road 90 City Olpe, Kansas ZIP 66865

Mailing Address (if different than above) P.O. Box 4967, Env. Services, Houston, TX 77210-4967

County Lyon Phone (620) 475-3226

Contact(s) Tom Jenkins - Area Supervisor and Victoria Wagner - Env. Coord. (713) 989-7459

Inspector(s) Victoria S. O'Brien SIC: 4922

Type of Business Natural Gas Compressor Station Number of Employees 18

Facility size classification: [] Closed [] Small Qty. Generator [X] EPA Generator [] Not a Generator [] Kansas Generator [] Transporter

Other Regulated Activities: (complete applicable checklist) [] T/S/D Facility [X] Used Oil Activities [] HW Burner/Marketer [] Universal Waste Activities

Has the company declared any information/processes as trade secrets (KSA 65-3447)? No
If yes, explain:

Industrial Wastes Generated

(List hazardous wastes first)

Waste:	Petroleum Naphtha from three parts washers	Shop Rags
If waste is hazardous give HW ID Number:	D001, D018, D039, D040	Exempt
Amount generated per month:	57 to 75 Gals Per Three Months	1500 to 2000 Per Week
Amount presently in storage:	None	Unknown
Accumulation time:	Not Applicable	<One Week
Present disposal methods:	Safety-Kleen	Arrowmark

Waste:	Oil Based Paints and Thinner	Sand Blast Media
If waste is hazardous give HW ID Number:	D001, D008, F003	Nonhazardous
Amount generated per month:	900 Pounds in 2001	40 Cubic Yards Per Year
Amount presently in storage:	None	None
Accumulation time:	Not Applicable	Not Applicable
Present disposal methods:	Safety-Kleen	Hamm's Quarry

Waste:	Basement Sludge	General Trash
If waste is hazardous give HW ID Number:	Nonhazardous	Nonhazardous
Amount generated per month:	330 Gallons Per Six Months	≈5,000 Pounds Per Year
Amount presently in storage:	220 Gallons	Unknown
Accumulation time:	Not Applicable	<One Week
Present disposal methods:	Hamm's Quarry	Waste Management

Waste:		
If waste is hazardous give HW ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal methods:		

Waste:		
If waste is hazardous give HW ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal methods:		

General Requirements (GGR)

	YES	NO	NA
1. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? [KAR 28-31-4(b)/40 CFR 261.2]	[X]	[ ]	
a. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? [KAR 28-31-4(b)(3)(A)]	[X]	[ ]	
b. If waste(s) was tested, are the results kept for three years from date waste was sent on/offsite for T/S/D? [KAR 28-31-4(f)(1)(C)]	[X]	[ ]	
2. Is hazardous waste(s) disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW)? [KAR 28-31-3/40 CFR 261.4]	[ ]	[X]	
a. If yes, does the facility discharge greater than 25 kilograms per month?	[ ]	[ ]	
b. If yes, has facility submitted the RCRA (Wastewater) Notification Form [40 CFR, Part 403.12(p)] to the following agencies:			
City - POTW?	[ ]	[ ]	
US EPA Region VII - Director of Waste Management?	[ ]	[ ]	
KDHE - Bureau of Waste Management?	[ ]	[ ]	
NOTE: RCRA (Wastewater) Notification forms are obtained from: Bureau of Water (785) 296-5551.			
3. Does facility dispose of industrial waste that requires a Special Waste Disposal Authorization at a permitted sanitary landfill?	[ ]	[ ]	
a. If yes, list the authorization number(s): 01-0486, 01, 0487, and 01-0488			

General Requirements: **[X] Compliance** **[ ] Non-Compliance** **[ ] NA**

Notification of Requirements (GGR)

4. Has facility notified KDHE and obtained an EPA Identification Number? [KAR 28-31-4(c)]	[X]	[ ]	
5. Is current notification accurate? [KAR 28-31-4(c)(1)]	[ ]	[X]	[ ]

Notification Requirements: **[ ] Compliance** **[X] Non-Compliance** **[ ] NA**

(small quantity generator not accumulating, stop here)

Pre-Transport Requirements (GPT)

	YES	NO	NA
6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 requirements? [KAR 28-31-4(e)(1)]	[X]	[ ]	
7. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of Subpart E of 49 CFR 172? [KAR 28-31-4(e)(2)]	[X]	[ ]	
8. Does generator mark (consignee's or consignor's name and address, etc.) on each package in accordance with DOT requirements of 49 CFR 172 Subpart D? [KAR 28-31-4(e)(3)]	[X]	[ ]	
a. Does generator mark each container of 110 gallons or less as below? [KAR 28-31-4(e)(3)]	[X]	[ ]	

Hazardous Waste-Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the US EPA.
Generator's Name and Address
Manifest Document Number

9. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? [KAR 28-31-4(e)(4)]	[ ]	[X]	
10. Does generator only use a transporter who has notified the department and obtained an EPA Identification Number? [KAR 28-31-4(c)(2)]	[X]	[ ]	

Pre-Transport Requirements: **[ ] Compliance** **[X] Non-Compliance** **[ ] NA**

Storage Requirements (GPT)

11. Does generator temporarily store waste in containers before transport? If yes,	[X]	[ ]	
a. Are containers marked with the words "Hazardous Waste"? [KAR 28-31-4(g)(3) or (h)(1)(D)]	[X]	[ ]	
b. Is the accumulation start date marked on each container? [KAR 28-31-4(g)(2) or (h)(1)(C)]	[X]	[ ]	
c. Are all containers holding hazardous waste in good condition and closed during storage except when necessary to add or remove waste? [KAR 28-31-4(g)(1) or (h)(1)(B)]	[X]	[ ]	
d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? [KAR 28-31-4(g)(1) or (h)(1)(B)]	[X]	[ ]	
A. If yes, are these inspections documented in a log that includes complete date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? [KAR 28-31-4(k)/40 CFR 265.15(d)]	[X]	[ ]	

Storage Requirements: **[X] Compliance** **[ ] Non-Compliance** **[ ] NA**

(Small quantity generator accumulating <1,000 Kilograms stop here)

Storage Requirements for Kansas and EPA Generators (GPT)

		YES	NO	NA
e.	Is hazardous waste stored for 90 days or less?	[X]	[ ]	
f.	Is ≥ 1,000 kilograms of hazardous waste stored for more than 90 days?	[ ]	[X]	
g.	Are containers holding ignitible or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) [KAR 28-31-4(g)(1)/40 CFR 265.176]	[X]	[ ]	[ ]
h.	If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? [KAR 28-31-4(g)(1) or (h)(1)(B)/40 CFR 265.177]	[X]	[ ]	[ ]
i.	Does generator have any satellite storage areas? [KAR 28-31-4(j)]	[ ]	[X]	
	A. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste?	[ ]	[ ]	
	B. Is the container in good condition and closed except to add or remove waste?	[ ]	[ ]	
	C. Is the container marked with the words "Hazardous Waste"?	[ ]	[ ]	
	D. Is the container marked with the accumulation start date at the time it becomes full?	[ ]	[ ]	
	E. Is the full container moved to the storage area within three days after it becomes full?	[ ]	[ ]	

(If waste(s) is placed in tanks, piles, or surface impoundments, complete the appropriate inspection checklist.)

Storage Requirements:	**[X] Compliance**	**[ ] Non-Compliance**	**[ ] NA**

Manifests (GMR)

12.	Is a contractual agreement used in place of manifesting? [KAR 28-31-4(d)(7)(A-C)/40 CFR 262.20(e)(1-2)]	[ ]	[X]	
	If yes,			
	a. Does the contractual agreement include the type of waste and frequency of shipments?	[ ]	[ ]	
	b. Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste?	[ ]	[ ]	
	c. Is a copy of the agreement kept for a period of three years after termination of agreement?	[ ]	[ ]	[ ]
13.	Is a current manifest showing revision date and burden disclosure statement used? [KAR 28-31-4(d)/40 CFR 262.20]	[X]	[ ]	
	a If yes, does manifest(s) include:			
	A. Generator EPA Identification Number (12 digit) and unique manifest document number (five digit)?	[X]	[ ]	
	B. Number of pages?	[X]	[ ]	
	C. Generator's name and mailing address?	[ ]	[X]	
	D. Generator's phone number?	[X]	[ ]	
	E. Transporter 1 Name?	[X]	[ ]	
	F. Transporter 1 EPA Identification Number?	[X]	[ ]	
	G. Transporter 2 Name?	[X]	[ ]	[ ]
	H. Transporter 2 EPA Identification Number?	[X]	[ ]	[ ]
	I. Name and site address of designated facility?	[X]	[ ]	
	J. Designated facility's EPA Identification Number?	[X]	[ ]	

	YES	NO	NA
K. Waste Description (DOT shipping name, hazard class, and Identification Number)?	[X]	[ ]	
i. If applicable, are the requirements of 49 CFR 172.203(k) met?	[X]	[ ]	
L. Number and type of containers?	[X]	[ ]	
M. Total quantity?	[X]	[ ]	
N. Unit (weight or volume)?	[X]	[ ]	
O. Special handling instructions?	[X]	[ ]	
P. Generator's certification including waste minimization statement, generator's signature and date?	[X]	[ ]	
Q. Name, signature, and date of transporter 1?	[X]	[ ]	
R. Name, signature, and date of transporter 2?	[X]	[ ]	[ ]
b. Does generator retain a copy of manifest(s) signed by both generator and transporter? [KAR 28-31-4(d)(4)(A-C)/40 CFR 262.23]	[X]	[ ]	
c. Does generator retain copy of manifest(s) signed and dated by T/S/D facility owner/operator for three years? [KAR 28-31-4(f)(1)(A)]	[X]	[ ]	
d. Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	[ ]	[X]	
A. If yes, was exception report(s) filed? [KAR 28-31-4(f)(4)(B)]	[ ]	[ ]	
i. If yes, was copy retained for three years? [KAR 28-31-4(f)(1)(A)]	[ ]	[ ]	

Manifesting Requirements: **[ ] Compliance** **[X] Non-Compliance** **[ ] NA**

Land Disposal Restriction Requirements (GLB)

14. Does facility generate waste(s) subject to the Land Disposal Restrictions? [KAR 28-31-14/40 CFR 268]	[X]	[ ]	
15. Does the generator dispose of his waste under a contractual or tolling agreement? [40 CFR 268.7(a)(10)]	[ ]	[X]	
a. If yes, is a Land Disposal Restriction Notice available for the initial shipment?	[ ]	[ ]	
b. If yes, is a copy of this notice kept for three years after termination of the agreement?	[ ]	[ ]	[ ]
16. Is the waste(s) covered by a National Variance(s), Extension, or Petition? [40 CFR 268.5 & 6]	[ ]	[X]	
a. If yes, describe the variance, extension, or petition which applies: _____			
17. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? [40 CFR 268.7(a)(1)]	[X]	[ ]	[ ]
If yes,			
a. Did the generator provide a notice with the initial shipment?	[X]	[ ]	
b. Did the notice include: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or nonwastewater classification, and subcategory, if applicable?	[ ]	[X]	
18. Has the generator determined that his waste meets applicable treatment standards or does not exceed prohibition levels and requires no further treatment? [40 CFR 268.7(a)(2)]	[ ]	[X]	

	YES	NO	NA
a. If yes, does the generator provide a notice and certification statement with each shipment, stating the waste meets applicable treatment standards or prohibition levels?	[ ]	[ ]	
19. Is the waste covered by an exemption? [40 CFR 268.7(a)(3)]	[ ]	[X]	
a. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions?	[ ]	[ ]	
20. Does the generator accumulate and treat waste in tanks, containers, or containment buildings to meet applicable treatment standards? [40 CFR 268.7(a)(4)]	[ ]	[X]	
If yes,			
a. Does the generator have verification that a notice was submitted to KDHE at least 30 days prior to treatment activity?	[ ]	[ ]	
b. Does the generator have, on-site, a written waste analysis plan describing procedures used to comply with the treatment standards?	[ ]	[ ]	
c. Does the generator ship waste off-site?	[ ]	[ ]	
A. If yes, does the generator provide a notice and certification statement with each shipment?	[ ]	[ ]	
21. Has the generator determined his waste to be restricted based solely on his knowledge of the waste?[40 CFR 268.7(a)(5)]	[ ]	[X]	
a. If yes, does the generator maintain all supporting data in his on-site files?	[ ]	[ ]	
22. Has the generator determined his waste to be restricted based on testing [40 CFR 268.7(a)(5)]	[X]	[ ]	
a. If yes, does the generator maintain a copy of these waste analysis in his on-site files?	[X]	[ ]	
23. Is the waste excluded from the definition of hazardous or solid waste, or is exempt from Subtitle C regulations? (40 CFR 268.7(a)(6))	[ ]	[X]	
a. If yes, does the generator retain, in their file, a one-time notice of the generation and subsequent exclusion from the definition of hazardous or solid waste, and information regarding the disposition of the waste?	[ ]	[ ]	
24. Does the generator retain copies of all notices, certifications, demonstrations waste analysis data, and other documents for at least 3 years? [40 CFR 268.7(a)(7)]	[X]	[ ]	[ ]
25. Does the generator claim that the hazardous debris is excluded from the definition of hazardous waste under 40 CFR 261.3(f)(1) or (2)? [40 CFR 268.7(d)]	[ ]	[X]	
a. If yes, does the generator provide a one-time notice and certification to the State of Kansas and retain a copy in his files?	[ ]	[ ]	
26. Is the generator managing a lab pack waste(s)? [40 CFR 268.7(a)(8)]	[ ]	[X]	
If yes,			
a. Does the generator wish to use an alternative treatment standard?	[ ]	[ ]	
b. Does the generator provide a notice and certification with each shipment?	[ ]	[ ]	
27. Does generator claim that their characteristic waste is no longer hazardous? [40 CFR 268.9(d)]	[ ]	[X]	
If yes,			

	YES	NO	NA
a. Has the generator submitted a one-time notice and certification to the State of Kansas and retained a copy for their files?	[ ]	[ ]	
b. Does the information on the notice and certification need to be updated?	[ ]	[ ]	

LDR Requirements: **[ ] Compliance** **[X] Non-Compliance** **[ ] NA**

Special Conditions (GSC)

28. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E & F)	[ ]	[X]	
If yes,			
a. Has generator filed a notice with the Secretary of the KDHE?	[ ]	[ ]	
b. Is waste manifested and signed by a foreign consignee?	[ ]	[ ]	
c. If generator transports waste out of the country, has confirmation of delivered shipment been received?	[ ]	[ ]	[ ]

Special Conditions Requirements: **[ ] Compliance** **[ ] Non-Compliance** **[X] NA**

(If Kansas generator, stop here)

Biennial Reports (GRR)

	YES	NO	NA
32. Has EPA generator submitted a biennial report(s) to KDHE? [KAR 28-31-4(f)(2)]	See Comments		
a. If yes, does the biennial report include a written description of the generator's waste minimization program? [KAR 28-31-4(f)/40 CFR 262.41(a)]	[ ]	[ ]	[ ]
A. If yes, does the description include:			
i. Efforts undertaken during the year to reduce the volume and toxicity of waste generated? [KAR 28-31-4(f)/40 CFR 262.41(a)(6)]	[ ]	[ ]	
ii. Changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [KAR 28-31-4(f)/40 CFR 262.41(a)(7)]	[ ]	[ ]	
iii. Certification by the generator or authorized representative? [KAR 28-31-4(f)/40 CFR 262.41(a)(8)]	[ ]	[ ]	
b. If no, can the facility personnel provide a verbal description of the waste minimization program?	[ ]	[ ]	[ ]

Description of Program:

_____

_____

c. Is there any visual evidence of the facility's waste minimization efforts? If yes, describe the activities/program observed.	[ ]	[ ]	
d. Does generator retain a copy of the report for three years? [KAR 28-31-4(f)(1)(B)]	[ ]	[ ]	

(Note: compare quantities reported on last biennial report with the total quantity of all manifests for those years.)

Biennial Report Requirements:	**[ ] Compliance**	**[ ] Non-Compliance**	**[X] NA**

Preparedness and Prevention (GPT)

33. If appropriate, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:			
a. Internal communication or alarm system easily accessible in case of emergency? [KAR 28-31-4(g)(4)/40 CFR 265.32(a)]	[X]	[ ]	
b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? [KAR 28-31-4(g)(4)/40 CFR 265.32(b)]	[X]	[ ]	[ ]
c. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? [KAR 28-31-4(g)(4)/40 CFR 265.32(c)]	[X]	[ ]	
d. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? [KAR 28-31-4(g)(4)/40 CFR 265.32(d)]	[X]	[ ]	
e. Is this equipment (a-c above) tested and maintained to ensure its proper operation? [KAR 28-31-4(g)(4)/40 CFR 265.33]	[ ]	[X]	
34. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [KAR 28-31-4(g)(4)/40 CFR 265.35]	[ ]	[ ]	[X]

35. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:

	YES	NO	NA
a. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(1)]	[X]	[ ]	
b. Designated one authority where one or more police or fire departments might respond to an emergency? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(2)]	[X]	[ ]	[ ]
c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(3)]	[ ]	[ ]	[X]
d. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility. [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)]	[ ]	[X]	
36. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [KAR 28-31-4(g)(4)/40 CFR 265.37(b)]	[ ]	[ ]	[X]

Preparedness and Prevention Requirements: **[ ] Compliance** **[X] Non-Compliance** **[ ] NA**

Personnel Training (GPT)

37. Has the owner/operator established a hazardous waste management training program? [KAR 28-31-4(g)(4)/40 CFR 265.16]	[X]	[ ]
a. Is the program directed by a person trained in hazardous waste management? [40 CFR 265.16(a)(2)]	[X]	[ ]
b. Are new personnel trained within six months after their employment? [40 CFR 265.16(b)]	[X]	[ ]
c. Are new employees supervised until training is completed? [40 CFR 265.16(b)]	[X]	[ ]
d. After initial training, are employees trained on an annual basis? [40 CFR 265.16(c)]	[X]	[ ]
e. Does the facility maintain the following documents and records:		
A. Job title for each position related to hazardous waste management and the name of the employee filling each job? [40 CFR 265.16(d)(l)]	[X]	[ ]
B. Written job description for each position? [40 CFR 265.16(d)(2)]	[ ]	[X]
C. Description of type and amount of training to be given each person? [40 CFR 265.16(d)(3)]	[X]	[ ]
D. Records of training given to facility personnel? [40 CFR 265.16(d)(4)]	[X]	[ ]

Personnel Training Requirements: **[ ] Compliance** **[X] Non-Compliance** **[ ] NA**

Contingency Plan (GPT)

38. Does the facility have a contingency plan? [KAR 28-31-4(g)(4)/40 CFR 265 Subpart D]	[X]	[ ]
If yes,		
a. Does the plan list the name(s), home address, and phone number of designated emergency coordinator(s) in the order in which they should be contacted? [40 CFR 265.52(d)]	[X]	[ ]
b. Is an emergency coordinator available at all times? [40 CFR 265.55]	[X]	[ ]
c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? [40 CFR 265.52(a)]	[ ]	[X]

		YES	NO	NA
d.	Does the plan describe arrangements made with emergency response agencies? [40 CFR 265.52(c)]	[ ]	[X]	
e.	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? [40 CFR 265.52(e)]	[ ]	[X]	
f.	Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? [40 CFR 265.52(f)]	[ ]	[X]	
g.	Have copies of the plan been provided to outside emergency response agencies and hospitals? [40 CFR 265.53]	[X]	[ ]	
h.	Has implementation of the plan been required at the facility?	[ ]	[X]	
	A. If yes, was the facility required to submit a written report on the incident to the KDHE?	[ ]	[ ]	
	i. If yes, was the written report submitted? [40 CFR 265.56(j)]	[ ]	[ ]	[ ]

Contingency Plan Requirements:	**[ ] Compliance**	**[X] Non-Compliance**	**[ ] NA**

(if EPA generator, stop here.)

GENLIST: Generator Checklist Revised 9/98

Additional Information and Conclusions:

On November 26, 2001, I conducted a routine hazardous waste compliance inspection of CMS Energy/Panhandle Eastern Pipe Line located at 985 Road 90, Olpe, Kansas in Lyon County. The facility, a natural gas compressor station, employs 18 individuals. The EPA identification number assigned to the site is KSD 984 972 737. Facility contacts for the inspection were Tom Jenkins - Area Supervisor and, via telephone, Victoria Wagner - Environmental Coordinator. Ms. Wagner is based in Houston, Texas. At the time of my inspection, the facility was regulated as a Kansas Generator based on generation and storage rates; however, the facility had notified as an EPA generator and Ms. Wagner requested that the facility be inspected as an EPA Generator. After discussing the situation with the Topeka office, the facility was inspected as an EPA Generator.

The facility generates 57 to 75 gallons of waste petroleum naphtha, classified as D001, D018, D039, D040 hazardous waste, every three months from the use of three parts washers serviced by Safety-Kleen. In 2001, the facility had a one-time generation of approximately 900 pounds of oil based paints and thinners, classified as D001, D008, F003 hazardous waste, from cleaning out a shed. The facility generates 1500 to 2000 shop rags each week that are picked up and laundered by Arrowmark.

Nonhazardous waste generated at the site include sand blasting media and basement sludge (dirt, paper, leaves, etc.) that are disposed of under special waste disposal authorizations at Hamm's Quarry. The facility's general trash is picked up weekly by Waste Management.

Used oil and used oil filters generated at the site are discussed in a separate report.

After completing the walk-through of the facility, discussing the facility's operations with Mr. Jenkins, and reviewing the facility's paperwork pertaining to nonhazardous and hazardous

waste management, I cite the facility for the following violations. Seven of the violations cited pertained to EPA Generators and were not actually applicable to the facility since it is regulated as a Kansas Generator. The seven violations applicable to EPA Generators are italicized below.

Violation 1 - K.A.R. 28-31-4(e)(4) - Failure to have placards - During the inspection, facility personnel could not produce any placards that the facility had available to offer to transporters of the company's hazardous waste.

Violation 2 - K.A.R. 28-31-4(d) - Failure to use correct generator name and/or address on nine manifests - During the inspection, facility personnel told me that the official name of the facility was CMS Energy/Panhandle Eastern Pipe Line. Over the last three years, the generator name reflected on hazardous waste manifests used to ship the facility's hazardous waste off-site has included: 1) PEPL, OLPE, KS Station, 2) Panhandle Eastern Pipeline, 3) PEPL, OLPE, KS, and 4) Panhandle Eastern.

In addition, the facility has used two separate generator addresses on the manifests: 1) 3 MI N 1 ½ MI W of OLP RR1 Box 174 A and 2) P.O. Box 4967, WT439, Houston, TX.

Documentation of this violation is set forth in Attachment 1 to this report.

Violation 3 - K.A.R. 28-31-14 - Failure to include manifest number on LDR forms - Facility personnel failed to include the manifest document number on the land disposal restriction forms for manifests 04292 and 40587. Documentation of this violation is set forth in Attachment 2 to this report.

Violation 4 - K.A.R. 28-31-4(g)(4) - Failure to follow written inspection schedule for emergency equipment - *The facility's monthly fire extinguisher inspection for the months of January 2001 and February 2001 were both conducted on February 5, 2001. Documentation of this violation is set forth in Attachment 3 to this report.*

Violation 5 - K.A.R. 28-31-4(g)(4) - Failure to familiarize local hospital in accordance with 40 CFR 265.37(a)(4) - *When I asked facility personnel for documentation that the facility had familiarized the local hospital of the properties of hazardous waste handled at the facility and the types of injuries or illnesses that would result from fires, explosions, or releases involving hazardous waste at the facility, I was given a copy of the facility's emergency response plan, see Attachment 4, and told that no other information had been provided to the hospital. The information set forth on the plan does not include all of the information required by 40 CFR 265.37(a)(4).*

Violation 6 - K.A.R. 28-31-4(g)(4) - Failure to describe emergency actions for fires involving hazardous waste - *The facility's emergency response plan set forth in Attachment 4 does not include any information pertaining to response*

actions that would be taken in the event the facility experienced a fire involving hazardous waste.

Violation 7 - K.A.R. 28-31-4(g)(4) - Contingency plan does not describe arrangements in accordance with 40 CFR 265.52(c) - *See Attachment 4 for documentation of this violation.*

Violation 8 - K.A.R. 28-31-4(g)(4) - Contingency plan does not include brief outline of the capabilities of emergency equipment - *See Attachment 4 for documentation of this violation.*

Violation 9 - K.A.R. 28-31-4(g)(4) - Contingency plan does not include evacuation routes - *The primary and secondary evacuation routes reflected in the facility's emergency response plan, see Attachment 4, only includes the office building and the auxiliary building. It does not included all of the areas in which the facility's parts washers are used or the designated hazardous waste storage area.*

Violation 10 - K.A.R. 28-31-4(c)(1) - Inaccurate notification - During the inspection, facility personnel told me that the official name of the company was CMS Energy/Panhandle Eastern Pipe Line. Therefore, I cited the facility for not submitting a revised notification. Ms. Wagner later informed me, via letter, that the official name of the company is PEPL - OLPE.

Violation 11 - K.A.R. 28-31-4(g)(4) - Failure to maintain written job descriptions - *A copy of the facility's job description for the Area Supervisor, Mr. Jenkins, is set forth in Attachment 5 to this report. The job description does not include information pertaining to Mr. Jenkins hazardous waste management job duties.*

ATTACHMENT 1

6-195-01 375

Please print or type. (Form designed for use on elite (12 pitch) typewriter.) Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737

Manifest Document No.: 61600 #00375

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PANHANDLE EASTERN
3 MI N. 1 1/2 MI W. OF OLP RR1 BOX 174 A
OLPE KS 66865

4. Generator's Phone (316 475-3226

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC

6. US EPA ID Number: ILD984908202

C. State Transporter's ID

D. Transporter's Phone: 316 942-5001

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC 619501
1311 S ANNA
WICHITA, KS 67209

10. US EPA ID Number: KSD000809723

G. State Facility's ID

H. Facility's Phone: 316 942-5001

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D006, D008, D018, D027, D039D040)(ERG#128)	X	3	DM	64	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D018 D006
(A) D008, D027, D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
0004 98334303 0001461600 0002033068 02

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Vicki L. Jacobs — Signature: Vicki L. Jacobs — Date (Month Day Year): 1 25 00

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Gilbert Baez — Signature: Gilbert Baez — Date (Month Day Year): 1 25 00

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date (Month Day Year):

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Coralee White — Signature: Coralee White — Date (Month Day Year): 1 26 00

GENERATOR / TRANSPORTER / FACILITY

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

A: 1.0083 B: C: D:

90290 (Rev 11/98) 6

ORIGINAL-RETURN TO GENERATOR

K54474-R5732 SAFETY-KLEEN 01/03/00 PAGE: 1
LOCATION: 619501 LDR NOTIFICATION FORM 01:58:20

GENERATOR NAME: PANHANDLE EASTERN MANIFEST NO.:
OR SALES SERVICE NO.: 1461600

CUST#: 0002-0330-68

PURSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS WASTE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0010083

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001
D006
D008
D018
D027
D039
D040

TREATABILITY GROUP: NONWASTEWATERS

WASTE CONSITITUENT NOTIFICATION: NONE

N O T E S

EXP NOTICE: THIS LDR EXPIRES ON 12/31/2000.

Vicki L. Jacobs / 1 / 25 / 00

GENERATOR'S AUTHORIZED SIGNATURE | NAME & TITLE (PRINTED OR TYPED) | DATE

SEQ#: 5721 LOC: 619501 TERR: 02 REF#: 1461600 SW: 0004

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

501

PAN16

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737
Manifest Document No.: 00501

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PEPL, OLPE, KS STATION
P.O. BOX 4967, WT439, HOUSTON, TX 77210

4. Generator's Phone (713) 989-7352

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: SAFETY KLEEN (TG), INC.
6. US EPA ID Number: SCR000074591

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID (316) 269-7400

F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN (WICHITA) INC.
2549 N. NEW YORK ST.
WICHITA, KS 67219-

10. US EPA ID Number: KSD007246846

G. State Facility's ID

H. Facility's Phone (316) 269-7400

GENERATOR

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	WASTE PAINT, 3, UN1263, II	X	005	DM	00900	P	D001 D008
b.	NON REGULATED MATERIAL, NONE		001	DM	00350	P	N/R
c.							
d.							

RECEIVED JUL 27 2001

J. Additional Descriptions for Materials Listed Above
Additional EPA Waste Codes a.F003 b. c. d.
a. 4x55gal, 1x35gal
b. 1x55gal
ERG#: a. c. c. d.

K. Handling Codes for Wastes Listed Above
a.
b.M131
c.
d.

15. Special Handling Instructions and Additional Information
PANHANDLE EASTERN PIPELINE CO
985 ROAD 90
OLPE, KS 66865

Profile Numbers a.2226592-16 b.2208745-45 c. d.

WO#: 50754
Emergency Contact: 800-468-1760
3E Company Fax 316-269-7455

2450-4 60633 5 60637 7-62807

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Dustin Redeker
Signature: Dustin Redeker
Date: Month 07 Day 17 Year 01

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Nate Embery
Signature:
Date: Month 07 Day 17 Year 01

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

JUL 24 2001

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Mellany McCastle
Signature: Mellany McCastle
Month 07 Day 23 Year 01

SAFETY-KLEEN CORP.

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

90290 (Rev 11/98) 6

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

LDR NOTIFICATION FORM

Generator Name Panhandle Eastern Pipeline CO Manifest No. 00501

Pursuant to 40 CFR §268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268 Land Disposal Restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

Form Line No.	SK Profile No.	EPA Waste Codes & LDR Subcategories (if any) *List codes or use Attachment 1*	NWW	WW	Waste Constituent Notification *Check the "None" box or List Legend Constituent # or use Attachment 2*
1	2226592-16	D001 LQ, D008, F003 ☐ Check if Attachment 1 has been used	☒	☐	Acetone, Xylene ☒ None ☐ Check if Attachment 2 has been used
2	2208745-45	None N/R ☐ Check if Attachment 1 has been used	☒	☐	☒ None ☐ Check if Attachment 2 has been used
3		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used
4		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used
5		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used
6		☐ Check if Attachment 1 has been used	☐	☐	☐ None ☐ Check if Attachment 2 has been used

B. HAZARDOUS DEBRIS NOTIFICATION

☐ This hazardous debris, as identified above on Line No(s)._____ is subject to the alternative treatment standards of 40 CFR §268.45. The waste contains the following contaminants subject to treatment (check all that apply):

☐ Toxicity characteristic debris ☐ Debris contaminated with listed waste ☐ Cyanide reactive debris

C. CONTAMINATED SOIL NOTIFICATION & CERTIFICATION

☐ This contaminated soil, as identified above on Line No(s). _____ is subject to the alternative treatment standards of 40 CFR §268.49(c). **Complete the following:** "I certify under penalty of law that I personally have examined this contaminated soil & it [☐ does/ ☐ does not] contain listed hazardous waste & [☐ does / ☐ does not] exhibit a characteristic of hazardous waste & [☐ is subject to / ☐ complies with] soil treatment standards as provided by §268.49(c) or the universal treatment standards". *Note: Constituents subject to treatment are any constituents listed in 40 CFR §268.48 Universal Treatment Standards that are reasonably expected to be present in any given volume of contaminated soil, except fluoride, selenium, sulfides, vanadium & zinc, & are present at concentrations greater than ten times the universal treatment standard.*

D. LAB PACK (INCINERATION) NOTIFICATION & CERTIFICATION

☐ This lab pack, as identified above on Line No(s). _____ is subject to the alternative treatment standards of 40 CFR §268.42(c). "I certify under penalty of law that I personally have examined & am familiar with the waste & that the lab pack contains only wastes that have not been excluded under Appendix IV to 40 CFR Part 268 & that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR §268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment".

E. EXTENSIONS & VARIANCES

☐ This waste, as identified above on Line No(s). _____ is not prohibited from land disposal & is subject to a deadline extension or variance, e.g., treatability variance, case-by-case extension. *Describe below any extension or variance that applies to this waste & include applicable dates:*

Dustin Redeker — Generator's Authorized Signature

Dustin Redeker Representative — Name & Title (Printed or Typed)

07 / 17 / 01 — Date

TEXAS NATURAL RESOURCE
CONSERVATION COMMISSION
P.O. Box 13087
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

RECEIVED
OCT 25 2001

Form approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. KSD984972737 — Manifest Document No. 003226

2. Page 1 of — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Olpe
Panhandle Eastern Pipeline
P.O. Box 4967
Attn: Environmental Service

4. Generator's Phone (620) 475-3226 Houston, TX 77210-4967

A. State Manifest Document Number: 02505902

B. State Generator's ID: 99920

5. Transporter 1 Company Name: Greensburg Oilfield Service

6. US EPA ID Number: KSR000005074

C. State Transporter's ID: 84763

D. Transporter's Phone: 620-723-2112

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Kim Thomas Disposal
Perryton, Texas

10. US EPA ID Number

G. State Facility's ID: WDW 311

H. Facility's Phone: 806-435-2624

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
	a. Nonregulated Waste Water			EST 5000	G	OUTS 1131
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Panhandle Eastern Pipeline Co.
P.O. Box 1642, Room WT 726
Houston, Texas 77251-1642

Mail Completed Manifest to
HOuston Address
Emergency # 1-800-535-5053

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: JB Richardson PEPL — Signature: JB Richardson — Month Day Year: 10 08 01

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name: Dennis R Powell — Signature: Dennis R Powell — Month Day Year: 10 8 01

18. Transporter 2 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. — Date

Printed/Typed Name: Kim Thomas Disposal — Signature: Joe Bullock — Month Day Year: 10 11 01

TNRCC-0311 (Rev. 07/01/97) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

6-195-01

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 00524 Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737
Manifest Document No.: [illegible]
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PEPL, OLPE KS
PO BOX 4967, WT439 ATTN: JANET HARPER
HOUSTON TX 77210
4. Generator's Phone (316) 475-3226

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. US EPA ID Number: SCR000075150
C. State Transporter's ID
D. Transporter's Phone: 316 942-5001

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC 619501
1311 S ANNA
WICHITA, KS 67209
10. US EPA ID Number: KSD000809723
G. State Facility's ID
H. Facility's Phone: 316 942-5001

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII RQ (D001)ERG#128 (6.7#/GL)(D018, D039, D040)	6	DM	57	G	D001 D039
b.							
c.							
d.							

RECEIVED SEP 25 [illegible]

199/H/L2
BH/10/5/01

J. Additional Descriptions for Materials Listed Above
I(A) D018 D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
0137 101121038 0018688018 0002033068 04

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Vicki Jacobs
Signature: Vicki Jacobs
Date: Month 9 Day 20 Year 01

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Anthony CEASAR
Signature: Anthony Ceasar
Date: Month 9 Day 20 Year 01

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space
CORRECTION LINE: 1 A. SHOULD READ 00324

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: James Anderson
Signature: [signature]
Month 9 Day 20 Year 01

GENERATOR / TRANSPORTER / FACILITY

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

A 801 B C D

ORIGINAL - RETURN TO GENERATOR

90290 (Rev 11/98) 6

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS FOR COMPLETION OF THIS FORM. REFER CODE OF FEDERAL REGULATIONS 40, PART 262.20

)4474-R5732 SAFETY-KLEEN 08/18/01 PAGE: 1
)CATION: 619501)R NOTIFICATION FORM 09:53:34

:NERATOR NAME: PEPL, OLPE KS MANIFEST NO.: ~~83017~~ 00524
OR SALES SERVICE NO.: 18688018

CUST#: 0002-0330-68

)RSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS
)STE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

)R FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0000801

A WASTE CODES & LDR SUBCATEGORIES (IF ANY):
)001 LQ LIQUID >= 10% TOC
)018
)039
)040

:EATABILITY GROUP: NONWASTEWATERS

)STE CONSITITUENT NOTIFICATION:
)00 O-CRESOL
:29 TETRACHLOROETHYLENE
:37 TRICHLOROETHYLENE
:47 ARSENIC
:50 CADMIUM
:55 LEAD
:57 MERCURY - ALL OTHERS
:60 SILVER
:7 BENZENE

N O T E S

P NOTICE: THIS LDR EXPIRES ON 12/31/2001.

Vicki Jacobs — Vicki Jacobs — 9/20/01
NERATOR'S AUTHORIZED SIGNATURE — NAME & TITLE (PRINTED OR TYPED) — DATE

Q#: 319 LOC: 619501 TERR: 04 REF#: 18688018 SW: 0137

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

6-195-01

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737

Manifest Document No.: 48944

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

PANHANDLE EASTERN
3 MI N. 1 1/2 MI W. OF OLP RR1 BOX 174 A
OLPE KS 66865

CC427

4. Generator's Phone (316) 475-3226

A. State Manifest Document Number: 73748944

B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC

6. US EPA ID Number: SCR000075150

C. State Transporter's ID

D. Transporter's Phone: 316 942-5001

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

SAFETY-KLEEN SYSTEMS, INC 619501
1311 S ANNA
WICHITA, KS 67209

10. US EPA ID Number: KSD000809723

G. State Facility's ID

H. Facility's Phone: 316 942-5001

GENERATOR

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII RQ (D001)ERG#128 (6.7#/GL)(D018, D039, D040)	X	3	DM	65	G	D001 D039
b.	WDR: 1026001						
c.							
d.							

J. Additional Descriptions for Materials Listed Above: I(A) D018 D040

K. Handling Codes for Wastes Listed Above

RECEIVED OCT 10 2000

15. Special Handling Instructions and Additional Information

IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
0040 099577617 0004248944 0002033068 02

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: DAN J. COBLE | Signature | Date: Month 10 Day 6 Year 00

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: DARRIN R. HARAWG | Signature | Date: Month 10 Day 4 Year 00

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: Scott Vincent | Signature | Date: Month 10 Day 4 Year 00

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

A 801 B C D

90290 (Rev 11/98) 6

ORIGINAL - RETURN TO GENERATOR

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS 40 PART 262.20

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

.54:74-R5732 SAFETY-KLEEN 08/28/00 PAGE: 1
.OCATION: 619501 LDR NOTIFICATION FORM 23:33:51

ENERATOR NAME: PANHANDLE EASTERN MANIFEST NO.: 48944
OR SALES SERVICE NO.: 4248944

CUST#: 0002-0330-68

URSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS
ASTE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

DR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0000801

PA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LQ LIQUID >= 10% TOC
D018
D039
D040

REATABILITY GROUP: NONWASTEWATERS

ASTE CONSITITUENT NOTIFICATION:
102 P-CRESOL (DIFFICULT TO DISTINGUISH FROM
M-CRESOL)
118 P-DICHLOROBENZENE
229 TETRACHLOROETHYLENE
237 TRICHLOROETHYLENE
250 CADMIUM
251 CHROMIUM (TOTAL)
255 LEAD
67 BENZENE

N O T E S

P NOTICE: THIS LDR EXPIRES ON 12/31/2000.

[signature] DAN J. Coble 10/4/00
NERATOR'S AUTHORIZED SIGNATURE NAME & TITLE (PRINTED OR TYPED) DATE

Q#: 5507 LOC: 619501 TERR: 02 REF#: 4248944 SW: 0040

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

6-195-03

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737

Manifest Document No.: 80599

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

PANHANDLE EASTERN
3 MI N. 1 1/2 MI W. OF OLP RR1 BOX 174 A
OLPE KS 66865

391

4. Generator's Phone (316) 475-3226

A. State Manifest Document Number: 73780599

B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC

6. US EPA ID Number: ILD984908202

C. State Transporter's ID

D. Transporter's Phone: 316 942-5001

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

619501
SAFETY-KLEEN SYSTEMS, INC
1311 S ANNA
WICHITA, KS 67209

10. US EPA ID Number: KSD000809723

G. State Facility's ID

H. Facility's Phone: 316 942-5001

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII RQ (D018)ERG#128 (6.7#/GL)(D001,D039,D040)	X	3	DM	74	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above

I(A) D018 D040

K. Handling Codes for Wastes Listed Above

RECEIVED APR 24 2000

15. Special Handling Instructions and Additional Information

IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
0016 98753728 0002380599 0002033068 02

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: STEVE GRANDON — Signature: Steve Grandon — Date: Month 4 Day 18 Year 00

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Scott Vincent — Signature: Scott — Date: Month 4 Day 18 Year 00

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: Coralee White. — Signature: Coralee White — Date: Month 4 Day 19 Year 00

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

A 801 B C D

90290 (Rev 11/98) 6

ORIGINAL-RETURN TO GENERATOR

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

54474-R5732 SAFETY-KLEEN 03/27/00 PAGE: 1
JCATION: 619501 DR NOTIFICATION FORM 04:44:17

ENERATOR NAME: PANHANDLE EASTERN MANIFEST NO.:
OR SALES SERVICE NO.: 2380599

CUST#: 0002-0330-68

JRSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS
ASTE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

DR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0000801

PA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LQ LIQUID >= 10% TOC
D018
D039
D040

REATABILITY GROUP: NONWASTEWATERS

ASTE CONSITITUENT NOTIFICATION:
102 P-CRESOL (DIFFICULT TO DISTINGUISH FROM
M-CRESOL)
118 P-DICHLOROBENZENE
229 TETRACHLOROETHYLENE
237 TRICHLOROETHYLENE
250 CADMIUM
251 CHROMIUM (TOTAL)
255 LEAD
57 BENZENE

N O T E S

P NOTICE: THIS LDR EXPIRES ON 12/31/2000.

Steve Grandon — STEVE GRANDON — 4 / 18 / 00
NERATOR'S AUTHORIZED SIGNATURE — NAME & TITLE (PRINTED OR TYPED) — DATE

Q#: 5171 LOC: 619501 TERR: 02 REF#: 2380599 SW: 0016

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

S-195-01 0[redacted]49 00449

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737
Manifest Document No.: 14470.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PANHANDLE EASTERN
3 MI N. 1 1/2 MI W. OF OLP RR1 BOX 174 A
OLPE KS 66865
4. Generator's Phone (316) 475-3226

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. US EPA ID Number: SCR000075150
C. State Transporter's ID
D. Transporter's Phone: 316 942-5001

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: 619501
SAFETY-KLEEN SYSTEMS, INC
1311 S ANNA
WICHITA, KS 67209
10. US EPA ID Number: KSD000809723
G. State Facility's ID
H. Facility's Phone: 316 942-5001

GENERATOR

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII RQ (D001)ERG#128 (6.7#/GL)(D018,D039,D040)	X	3	DM	75	G	D001 D039
b.	100/HW/C2 BT 1/3/00						
c.	NEEDS LDR						
d.	1026215						

J. Additional Descriptions for Materials Listed Above
I(A) D018 D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
0052 099970595 0005141470 0002033068 02

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Terry Barrett — Signature: Terry Barrett — Date: Month 12 Day 27 Year 00

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: DARRIN R HARDING — Signature — Date: Month 12 Day 27 Year 00

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Scott Vincent — Signature — Date: Month 12 Day 27 Year 00

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

A 801 B C D

90290 (Rev 11/98) 6

ORIGINAL - RETURN TO GENERATOR

reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, 223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

54474-R5732 SAFETY-KLEEN 12/02/00 PAGE: 1
OCATION: 619501 DR NOTIFICATION FORM 07:50:02
4/470 #00449

ENERATOR NAME: PANHANDLE EASTERN MANIFEST NO.:
OR SALES SERVICE NO.: 5141470

CUST#: 0002-0330-68

URSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS
ASTE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

OR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0000801

PA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LQ LIQUID >= 10% TOC
D018
D039
D040

REATABILITY GROUP: NONWASTEWATERS

ASTE CONSITITUENT NOTIFICATION:
L02 P-CRESOL (DIFFICULT TO DISTINGUISH FROM M-CRESOL)
L18 P-DICHLOROBENZENE
229 TETRACHLOROETHYLENE
237 TRICHLOROETHYLENE
250 CADMIUM
251 CHROMIUM (TOTAL)
255 LEAD
57 BENZENE

N O T E S

P NOTICE: THIS LDR EXPIRES ON 12/31/2000.

Terry G. Barrett — NERATOR'S AUTHORIZED SIGNATURE
Terry G. Barrett — NAME & TITLE (PRINTED OR TYPED)
12 / 27 / 00 — DATE

Q#: 5974 LOC: 619501 TERR: 02 REF#: 5141470 SW: 0052

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

6-195-01 00495 26833 496

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737
Manifest Document No.: ~~78178~~
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PANHANDLE EASTERN
3 MI N. 1 1/2 MI W. OF OLP RR1 BOX 174 A
OLPE KS 66865
4. Generator's Phone (316) 475-3226

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. US EPA ID Number: SCR000075150
C. State Transporter's ID
D. Transporter's Phone: 316 942-5001

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC 619501
1311 S ANNA
WICHITA, KS 67209
10. US EPA ID Number: KSD000809723
G. State Facility's ID
H. Facility's Phone: 316 942-5001

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII RQ (D001)ERG#128 (6.7#/GL)(D018,D039,D040)	X	5	DM	72	G	D001 D039
b.						
c.						
d.						

RECEIVED JUN 28 2001

182/NH/L2
BH/7.16.01

J. Additional Descriptions for Materials Listed Above
I(A) D018 D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
0124 100723925 0017778178 0002033068 04

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR — Printed/Typed Name: Vicki L. Jacobs — Signature: Vicki L. Jacobs — Date: Month 6 Day 19 Year 01

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: RANDALL S. SHERPING — Signature: [signature] — Date: Month 06 Day 19 Year 01
18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name: — Signature: — Date: Month Day Year

FACILITY
19. Discrepancy Indication Space
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Scott VINCENT — Signature: [signature] — Date: Month 06 Day 19 Year 01

SAFETY-KLEEN CORP.

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

A 801 B C D

ORIGINAL - RETURN TO GENERATOR

90290 (Rev 11/98) 6

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

54474-R5732 SAFETY-KLEEN 05/19/01 PAGE: 1
OCATION: 619501 LDR NOTIFICATION FORM 14:50:43

ENERATOR NAME: PANHANDLE EASTERN MANIFEST NO.: ~~78,78~~ 00496
OR SALES SERVICE NO.: 17778178

CUST#: 0002-0330-68

URSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS
ASTE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

DR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0000801

PA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LQ LIQUID >= 10% TOC
D018
D039
D040

REATABILITY GROUP: NONWASTEWATERS

ASTE CONSITITUENT NOTIFICATION:
100 O-CRESOL
229 TETRACHLOROETHYLENE
237 TRICHLOROETHYLENE
247 ARSENIC
250 CADMIUM
255 LEAD
257 MERCURY - ALL OTHERS
260 SILVER
57 BENZENE

N O T E S

P NOTICE: THIS LDR EXPIRES ON 12/31/2001.

Vicki L Jacobs — Vicki Jacobs Adm Asst. — 6 / 19 / 01
NERATOR'S AUTHORIZED SIGNATURE — NAME & TITLE (PRINTED OR TYPED) — DATE

Q#: 3551 LOC: 619501 TERR: 04 REF#: 17778178 SW: 0124

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

6-195-01

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737

Manifest Document No.: 00470

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PANHANDLE EASTERN
3 MI N. 1 1/2 MI W. OF OLP RR1 BOX 174 A
OLPE KS 66865

4. Generator's Phone (316) 475-3226

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC

6. US EPA ID Number: SCR000075150

C. State Transporter's ID

D. Transporter's Phone: 316 942-5001

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address 619501
SAFETY-KLEEN SYSTEMS, INC
1311 S ANNA
WICHITA, KS 67209

10. US EPA ID Number: KSD000809723

G. State Facility's ID

H. Facility's Phone: 316 942-5001

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII RQ (D001)ERG#128 (6.7#/GL)(D018, D039, D040)	X	3	DM	68	G	D001 D039
b.						
c.						
d.						

RECEIVED MAR 26 2001

J. Additional Descriptions for Materials Listed Above
I(A) D018 D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
0112 100344536 0006007282 0002033068 04

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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GENERATOR — Printed/Typed Name: Vicki Jacobs — Signature: Vicki Jacobs — Date (Month Day Year): 3 21 01

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: RANDALL S. SHERPINE — Signature: [signature] — Date (Month Day Year): 03 21 01

18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name: — Signature: — Date (Month Day Year):

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: Coralee White — Signature: Coralee White — Date (Month Day Year): 3 22 01

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

A 801 B C D

ORIGINAL - RETURN TO GENERATOR

90290 (Rev 11/98) 6

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

4474-R5732 SAFETY-KLEEN 02/24/01 PAGE: 1
CATION: 619501 LDR NOTIFICATION FORM 08:27:47

NERATOR NAME: PANHANDLE EASTERN MANIFEST NO.: 00470
OR SALES SERVICE NO.: 6007282

CUST#: 0002-0330-68

RSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS
STE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

R FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0000801

A WASTE CODES & LDR SUBCATEGORIES (IF ANY):
001 LQ LIQUID >= 10% TOC
018
039
040

EATABILITY GROUP: NONWASTEWATERS

STE CONSITITUENT NOTIFICATION:
00 O-CRESOL
29 TETRACHLOROETHYLENE
37 TRICHLOROETHYLENE
47 ARSENIC
50 CADMIUM
55 LEAD
57 MERCURY - ALL OTHERS
50 SILVER
7 BENZENE

N O T E S

NOTICE: THIS LDR EXPIRES ON 12/31/2001.

Vicki Jacobs — Vicki Jacobs Adm Asst — 03, 21, 01

ERATOR'S AUTHORIZED SIGNATURE — NAME & TITLE (PRINTED OR TYPED) — DATE

#: 3911 LOC: 619501 TERR: 04 REF#: 6007282 SW: 0112

OP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

ATTACHMENT 2

-195-01

ase print or type. (Form designed for use on elite (12-pitch) typewriter.) 00359 Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737
Manifest Document No.: 04292
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PANHANDLE EASTERN
3 MI N. 1 1/2 MI W. OF OLP RR1 BOX 174 A
OLPE KS 66865
4. Generator's Phone (316 475-3226

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. US EPA ID Number: ILD984908202
C. State Transporter's ID
D. Transporter's Phone 316 942-5001

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC 619501
1311 S ANNA
WICHITA, KS 67209
10. US EPA ID Number: KSD000809723
G. State Facility's ID
H. Facility's Phone 316 942-5001

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII(D001) (D006, D008, D018, D027, D039D040) (ERG#128)	3	DM	62	G	D001 D039
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D018 D006
(A) D008, D027, D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
9944 97927641 0000504292 6195013451 02

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Vick L. Jacobs
Signature: Vicki L. Jacobs
Date: Month 11 Day 3 Year 99

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Gilbert Baeza
Signature: Gilbert Baeza
Date: Month 11 Day 3 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Scott Vincent
Signature: Scott
Date: Month 11 Day 3 Year 99

GENERATOR / TRANSPORTER / FACILITY

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

A: 10083 B: C: D:

90290 (Rev 11/98) 6

ORIGINAL-RETURN TO GENERATOR

223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

K54374-R5732
LOCATION: 619501

SAFETY-KLEEN
LDR NOTIFICATION FORM

10/11/99 PAGE: 1
11:54:56

GENERATOR NAME: PANHANDLE EASTERN

MANIFEST NO.:
OR SALES SERVICE NO.: 504292

CUST#: 6-195-01-3451

PURSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS WASTE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0010083

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001
D006
D008
D018
D027
D039
D040

TREATABILITY GROUP: NONWASTEWATERS

WASTE CONSITITUENT NOTIFICATION: NONE

N O T E S

EXP NOTICE: THIS LDR EXPIRES ON 12/31/1999.

Vicki Jacobs — GENERATOR'S AUTHORIZED SIGNATURE
NAME & TITLE (PRINTED OR TYPED)
11/3/99 — DATE

SEQ#: 4736 LOC: 619501 TERR: 02 REF#: 504292 SW: 9944

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

E-195-01 #00404

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: KSD984972737
Manifest Document No.: 40587
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PANHANDLE EASTERN
3 MI N. 1 1/2 MI W. OF OLP RR1 BOX 174 A
OLPE KS 66865
4. Generator's Phone (316) 475-3226

A. State Manifest Document Number: 73740587
B. State Generator's ID

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. US EPA ID Number: SCR000075150
C. State Transporter's ID
D. Transporter's Phone: 316 942-5001

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC 619501
1311 S ANNA
WICHITA, KS 67209
10. US EPA ID Number: KSD000809723
G. State Facility's ID
H. Facility's Phone: 316 942-5001

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII RQ (D001)ERG#128 (6.7#/GL)(D018, D039, D040)	X	3	DM	68	G	D001 D039
b.	WDR 1025745						
c.							
d.							

J. Additional Descriptions for Materials Listed Above
I(A) D018 D040

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
IF UNDELIVERABLE, RETURN TO GENERATOR. FOR RECYCLE
EMERGENCY RESPONSE#800-468-1760 24HR.
0028 99178113 0003340587 0002033068 02

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Vicki L. Jacobs
Signature: Vicki L. Jacobs
Date: Month 7 Day 11 Year 00

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Rod Emery
Signature: Rod E
Date: Month 7 Day 11 Year 00

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

RECEIVED JUL 14 2000

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Coralee White
Signature: Coralee White
Date: Month 7 Day 12 Year 00

GENERATOR / TRANSPORTER / FACILITY

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

A 801 B C D

SAFETY-KLEEN CORP.
90290 (Rev 11/98) 6

ORIGINAL-RETURN TO GENERATOR

K54474-R5732.
LOCATION: 619501

SAFETY-KLEEN
LDR NOTIFICATION FORM

06/19/00 PAGE: 1
07:05:08

GENERATOR NAME: PANHANDLE EASTERN

MANIFEST NO.:
OR SALES SERVICE NO.: 3340587

CUST#: 0002-0330-68

PURSUANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS WASTE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0000801

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LQ LIQUID >= 10% TOC
D018
D039
D040

TREATABILITY GROUP: NONWASTEWATERS

WASTE CONSITITUENT NOTIFICATION:
102 P-CRESOL (DIFFICULT TO DISTINGUISH FROM M-CRESOL)
118 P-DICHLOROBENZENE
229 TETRACHLOROETHYLENE
237 TRICHLOROETHYLENE
250 CADMIUM
251 CHROMIUM (TOTAL)
255 LEAD
67 BENZENE

NOTES

EXP NOTICE: THIS LDR EXPIRES ON 12/31/2000.

GENERATOR'S AUTHORIZED SIGNATURE: Victor L. Jacobs
NAME & TITLE (PRINTED OR TYPED):
DATE: 7/6/00

SEQ#: 5418 LOC: 619501 TERR: 02 REF#: 3340587 SW: 0028

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

Faxed to Dafner - Houston Env. 7/24/00

ATTACHMENT 3

JANUARY 2001

FIRE EXTINGUISHER INSPECTION

7-29 9/85

Station Reporting OKPE KANSAS Date 2-5-01

ANNUAL INSPECTION.

Location (Building or Type Vehicle)	Size	Type	Serial Number	Date of Hydrostatic Test	Next Test	Condition
1 MER #1 by 603 North Door	1961	30-D	D520711	05-12-97	09	OK JC
2 MER #1 by 605 North Door	1960	30-D	B380424	04-22-98	10	OK JC
3 MER #1 by 609 North Door	1960	30-D	B380425	05-12-97	09	OK JC
4 MER #1 by 613 North Door	1965	30-D	L317912	04-22-98	10	OK JC
5 MER #1 by 617 North Door	1960	30-D	B674348	04-22-98	10	OK JC
6 MER #1 by Northeast Door	1966	30-E	P560860	06- -90	02	OK JC
7 MER #1 by 620 South Door	1972	30-E	--	05-12-97	09	OK JC
8 MER #1 by 616 South Door	1967	30-E	P560844	06- -90	02	Repaired 2/11/99 OK JC
9 MER #1 by 614 South Door	1962	30-D	E328034	04-22-98	10	OK JC
10 MER #1 by 612 South Door	1962	30-D	E328259	10-28-96	08	OK JC
11 MER #1 by 610 South Door	1960	30-D	B674371	04-22-98	10	OK JC
12 MER #1 by 606 South Door	1960	30-D	B380451	05-12-97	09	OK JC
13 MER #1 Southwest Door	1971	30-E	--	03- -93	05	OK JC
14 MER #1 Basement by SW Door	1962	30-D	E328151	04-22-98	10	OK JC
15 MER #1 Bsmt under 613 S. door	1960	30-D	B674373	04-22-98	10	OK JC
16 MER #1 Basement SE Door	1966	30-E	P560814	04-22-98	10	OK JC
17 MER #1 Bsmt Northeast Corner	1964	30-D	K273862	06- -90	02	OK JC
18 MER #2 Southeast Door by 624	1965	30-D	M92875	06- -90	02	OK JC
19 MER #2 East Door btwn 624/623	1968	30-E	--	03- -93	05	OK JC
20 MER #2 East Door btwn 623/622	1966	30-E	P560849	06- -90	02	OK JC
21 MER #2 East Door by 621	1965	30-D	M92453	05-12-97	09	OK JC
22 MER #2 Northwest Door	1960	30-D	B380448	05-12-97	09	OK JC
23 MER #2 West Door by 621	1961	30-D	D520470	04-22-98	10	OK JC
24 MER #2 West Door by 622	1960	30-D	B583443	05-12-97	09	OK JC
25 MER #2 West Door by 623	1968	30-E	--	03- -93	05	OK JC
26 MER #2 West Wall by 624	1968	30-E	--	03- -93	05	OK JC
27 MER #2 Southwest Door by 624	1966	30-E	P560836	06- -90	02	OK JC
28 Cob House North Door	1964	30-D	K276120	[redacted] 1-2000	12	OK JC
29 Cob House South Door	1973	30-E	--	05-12-97	09	OK JC
30 Old Shop East Door	1960	30-D	B674331	05-12-97	09	OK JC
31 ~~Plant Locker Room~~ SPARE	1961	30-D	D520444	04-22-98	10	[redacted] ~~[illegible]~~ OK
32 Gasket Room	1973	30-E	--	05-12-97	09	Repaired 2/11/99 OK-JC
33 Aux Eng Room Northwest Door	1967	30-E	P560855	06- -90	02	OK JC
34 Aux Eng Room N. Door by 626	1973	30-E	--	05-12-97	09	OK JC

Fire Protection System

Water Hoses Inspected
Fire Pump Inspected
Halon System Inspected

Date of Inspection: 2-5-01 - JERRY COMMER FORD SCOTT HUDSON

Remarks: #31 IS NOW A SPARE FIRE EXTINGUISHER - WHEN LOCKER ROOM WAS REMODELED IT WAS DECIDED TO NOT PUT IT BACK

Supervisor _____ Date _____

JANUARY 2001

FIRE EXTINGUISHER INSPECTION

7-29 9/85

...tion Reporting _____ Date 2-5-01

ANNUAL INSPECTION

	Location (Building or Type Vehicle)	Size	Type	Serial Number	Date of Hydrostatic Test	Next Test	Condition
35	Aux Eng Room Northeast Door	1960	30-D	B380439	05-12-97	09	OK JC
36	Aux Eng Room S. Door by 626	1962	30-E	E328265	05-12-97	09	OK JC
37	Machine Shop Small East Door	1966	30-D	N685174	05-12-97	09	AI-SH-2-5-01
38	Machine Shop South Door	1960	30-D	B36469	04-22-98	10	AI-SH-2-5-01
39	Machine Shop West Door	1973	30-E	--	05-12-97	09	AI-SH-2-5-01
40	Area Office	1973	Sentry 10	AZ581976	06- -90	02	AI- SH-1-10-01
41	12-1	1973	30-E	--	04-22-98	10	AI-SH-2-5-01
42	VACANT	1969	30-E	--	04- -91	03	
43	Vacant						
44	Vacant						
45	Vacant						
46	Vacant						
47	Gas Tank on Hill	1973	30-E	---	04-22-98	10	AI-SH-2-5-01
48	8-1	1975	30-E	15997	02-11-99	11	DELETE #48
49	Vacant						
50	[redacted] VACANT	1977	Sentry 10	--	04- -91	03	
51	Spare	1971	30-E	--	05-12-97	09	#51 GOES ON 8-1 OK JC
52	8-2	1982	30-E	EB093876	04- -94	06	OK JC
	Diesel Tank - 200 Discharge	1971	30-E	--	05-12-97	09	AI-SH-2-5-01
54	Paint Shed & Barrel Rack	1983	30-E	EN863923	04- -94	06	OK JC
55	Encal Building	1986	Sentry 10	GA00205992	04- -91	03	AI- SH-1-10-01
56	Calorimeter Building	1987	Sentry 10	HH00008605	11- -92	04	AI- SH-1-10-01
57	West Wall in Opr A's Office	1990	SY-0243	S-975426	06- -90	02	AI- SH-1-10-01
58							
59							

Fire Protection System

Water Hoses	Inspected
Fire Pump	Inspected
Halon System	Inspected

Date of Inspection: 2-5-01

Remarks: #48 HAS BEEN DELETED OFF UNIT 8-1 AND #51 SPARE HAS BEEN PERMANANTLY ASSIGNED TO UNIT 8-1

Supervisor _____ Date _____

FIRE EXTINGUISHER INSPECTION

7-29 9/85

Location Reporting OHPE, MS. Date FEBRUARY 2001

	Location (Building or Type Vehicle)	Size	Type	Serial Number	Date of Hydrostatic Test	Next Test	Condition
1	MER #1 by 603 North Door	1961	30-D	D520711	05-12-97	09	OK-SH
2	MER #1 by 605 North Door	1960	30-D	B380424	04-22-98	10	OK-SH
3	MER #1 by 609 North Door	1960	30-D	B380425	05-12-97	09	OK-SH
4	MER #1 by 613 North Door	1965	30-D	L317912	04-22-98	10	OK-SH
5	MER #1 by 617 North Door	1960	30-D	B674348	04-22-98	10	OK-SH
6	MER #1 by Northeast Door	1966	30-E	P560860	06- -90	02	OK-SH
7	MER #1 by 620 South Door	1972	30-E	--	05-12-97	09	OK-SH
8	MER #1 by 616 South Door	1967	30-E	P560844	06- -90	02	Repaired 2/11/99 OK SH
9	MER #1 by 614 South Door	1962	30-D	E328034	04-22-98	10	OK-SH
10	MER #1 by 612 South Door	1962	30-D	E328259	10-28-96	08	OK-SH
11	MER #1 by 610 South Door	1960	30-D	B674371	04-22-98	10	OK-SH
12	MER #1 by 606 South Door	1960	30-D	B380451	05-12-97	09	OK-SH
13	MER #1 Southwest Door	1971	30-E	--	03- -93	05	OK-SH
14	MER #1 Basement by SW Door	1962	30-D	E328151	04-22-98	10	OK-SH
15	MER #1 Bsmt under 613 S. door	1960	30-D	B674373	04-22-98	10	OK-SH
16	MER #1 Basement SE Door	1966	30-E	P560814	04-22-98	10	OK-SH
17	MER #1 Bsmt Northeast Corner	1964	30-D	K273862	06- -90	02	OK-SH
18	MER #2 Southeast Door by 624	1965	30-D	M92875	06- -90	02	OK-SH
19	MER #2 East Door btwn 624/623	1968	30-E	--	03- -93	05	OK-SH
20	MER #2 East Door btwn 623/622	1966	30-E	P560849	06- -90	02	OK-SH
21	MER #2 East Door by 621	1965	30-D	M92453	05-12-97	09	OK-SH
22	MER #2 Northwest Door	1960	30-D	B380448	05-12-97	09	OK-SH
23	MER #2 West Door by 621	1961	30-D	D520470	04-22-98	10	OK-SH
24	MER #2 West Door by 622	1960	30-D	B583443	05-12-97	09	OK-SH
25	MER #2 West Door by 623	1968	30-E	--	03- -93	05	OK-SH
26	MER #2 West Wall by 624	1968	30-E	--	03- -93	05	OK-SH
27	MER #2 Southwest Door by 624	1966	30-E	P560836	06- -90	02	OK-SH
28	Cob House North Door	1964	30-D	K276120	01-25-00	12	OK-SH
29	Cob House South Door	1973	30-E	--	05-12-97	09	OK-SH
30	Old Shop East Door	1960	30-D	B674331	05-12-97	09	OK-SH
31	Spare	1961	30-D	D520444	04-22-98	10	OK-SH
32	Gasket Room	1973	30-E	--	05-12-97	09	Repaired 2/11/99 OK SH
33	Aux Eng Room Northwest Door	1967	30-E	P560855	06- -90	02	OK-SH
34	Aux Eng Room N. Door by 626	1973	30-E	--	05-12-97	09	OK-SH

Fire Protection System

Water Hoses	Inspected
Fire Pump	Inspected
Halon System	Inspected

Date of Inspection: 2-5+6+9-01

Remarks:

Supervisor [signature] Date 2/28/01

FIRE EXTINGUISHER INSPECTION

7-29 9/85

Location Reporting OLPE, ITS. Date FEBRUARY 2001

	Location (Building or Type Vehicle)	Size	Type	Serial Number	Date of Hydrostatic Test	Next Test	Condition
35	Aux Eng Room Northeast Door	1960	30-D	B380439	05-12-97	09	OK-SH
36	Aux Eng Room S. Door by 626	1962	30-E	E328265	05-12-97	09	OK-SH
37	Machine Shop Small East Door	1966	30-D	N685174	05-12-97	09	OK-SH
38	Machine Shop South Door	1960	30-D	B36469	04-22-98	10	OK-SH
39	Machine Shop West Door	1973	30-E	--	05-12-97	09	OK-SH
40	Area Office	1973	Sentry 10	AZ581976	06- -90	02	OK-SH
41	12-1	1973	30-E	--	04-22-98	10	OK-SH
42	Vacant						
43	Vacant						
44	Vacant						
45	Vacant						
46	Vacant						
47	Gas Tank on Hill	1973	30-E	---	04-22-98	10	OK-SH
48	Disposed of						
49	Vacant						
50	vacant						
51	8-1	1971	30-E	--	05-12-97	09	OK-SH
[illegible]	8-2	1982	30-E	EB093876	04- -94	06	OK-SH
53	Diesel Tank - 200 Discharge	1971	30-E	--	05-12-97	09	OK-SH
54	Paint Shed & Barrel Rack	1983	30-E	EN863923	04- -94	06	OK-SH
55	Encal Building	1986	Sentry 10	GA00205992	04- -91	03	OK-SH
56	Calorimeter Building	1987	Sentry 10	HH00008605	11- -92	04	OK-SH
57	West Wall in Opr A's Office	1990	SY-0243	S-975426	06- -90	02	OK-SH
58							
59							

Fire Protection System

Water Hoses	Inspected
Fire Pump	Inspected
Halon System	Inspected

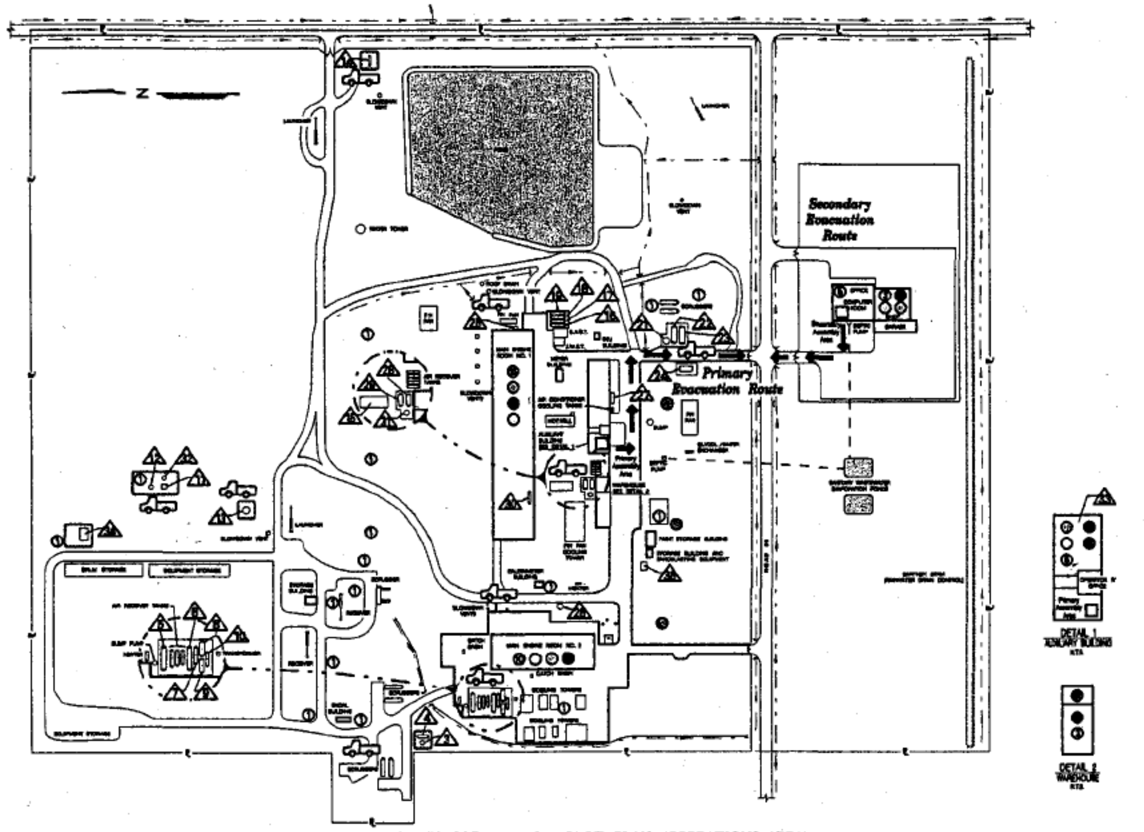
Date of Inspection: 2-5+6+9-01

Remarks:

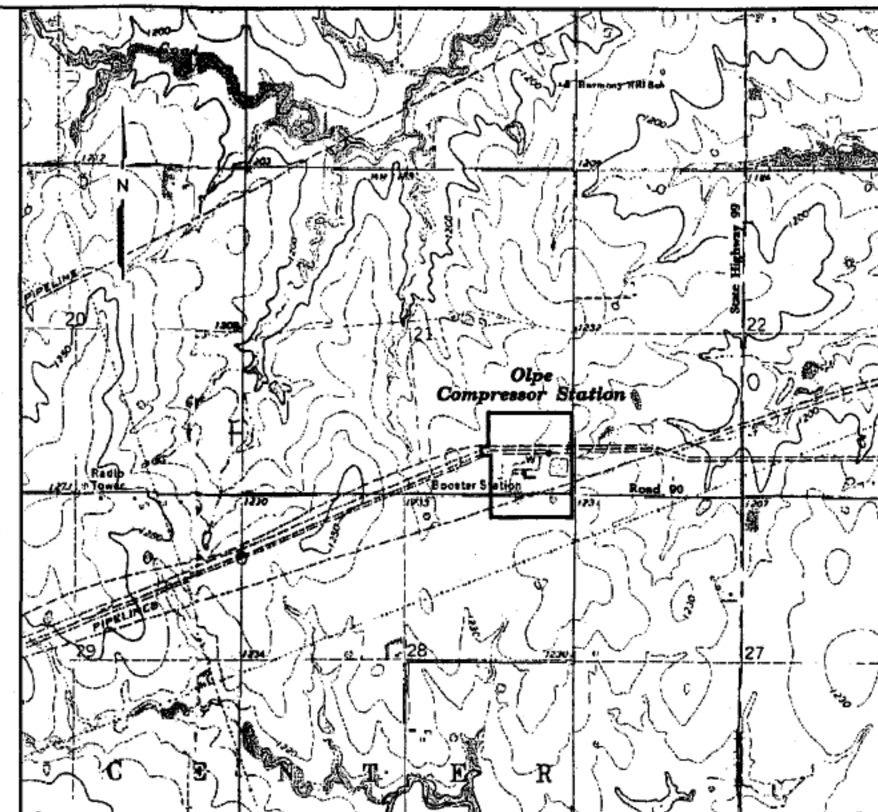
Supervisor [signature] Date 2/28/01

ATTACHMENT 4

SPILL PROCEDURES



OLPE COMPRESSOR STATION PLOT PLAN (OPERATIONS AREA)



Station Lat: 38°17'14"N; Long: 96°12'00"W

General drainage patterns from facility flow east into a drainage ditch. The rainwater then flows into a tributary of Cole Creek two miles away, prior to discharging into Cottonwood River.

Olpe, Kansas

Panhandle Eastern Emergency Contacts

[redacted]

"On Call" Emergency Coordinator

Contact Panhandle Eastern Pipe Line Company, Gas Control Department, Dispatcher in Houston, Texas at (713) 627-8823 to contact the designated "On Call" Emergency Coordinator.

Local Authorities

Lyon County Sheriff's Dept.
5th and Mechanic
Emporia, Kansas
(316) 342-5545

Newman Memorial County Hosp.
12th and Chestnut
Emporia, Kansas
(316) 343-6800

Emporia Fire Department
522 Mechanic
Emporia, Kansas
(316) 342-5105

Olpe Fire Department
Olpe, Kansas
(316) 475-3322

Distribution/Training/Updates

A copy of this plan and revision will be distributed as follows:

Distribution	Responsibilities
Emergency Coordinator (Station)	• Review this plan with new facility employees before beginning employment. • Review this plan with all facility personnel annually. • Document employee review and maintain in the Environmental Filing System. • Review and provide a copy of this plan to the Local Authorities listed above. • Maintain agency correspondence (acknowledgement of receipts, etc.) in the Environmental Filing System.
Environmental Compliance Department	• Ensure that the plan format covers regulatory requirements.
Division Manager – Transmission	• Ensure the plan is up to date if one of the following occurs: – A facility change which materially increases the potential for a spill, fire, hazardous waste release or other emergency. – A change in emergency coordinator or local authorities. – A change in emergency equipment. – An increase in storage capacity of oil, hazardous waste, or hazardous material. – A change in applicable regulations as determined by the Environmental Compliance Department. – A spill occurs at this facility which requires regulatory notification.
Area Superintendent – Transmission	• Maintain a copy of the approved plan and all revisions.
Local Authorities (Listed Above)	• Maintain a copy of the approved plan and all revisions.
Transmission – Technical Services	• Maintain a copy of the approved plan and all revisions.

Preparedness and Prevention

Preventative Measures at Potential Emergency Spill Areas

STORAGE FACILITIES

	Dwg. ID	Facility #	Contents	Capacity (Gals)	Secondary Containment *	Tank ** Inspections	Overflow Prevention Device (OPD)	OPD Testing
Aboveground Storage Tanks	△	4	Pipeline Liquids Tank	8,400	Earthen Dike	Weekly	Direct Vision Gage	Routinely
	△	5	Lube Oil Tank	9,030	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	6	Lube Oil Tank	8,216	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	7	Lube Oil Tank	2,821	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	8	Glycol Tank	4,398	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	9	Glycol Tank	4,398	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	10	Glycol Tank	2,821	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	16	Glycol Tank	2,068	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	11	Diesel Tank	141	Earthen Dike	Weekly	Direct Vision Gage	Routinely
	△	12	Gasoline Tank	560	Earthen Dike	Weekly	Direct Vision Gage	Routinely
	△	14	Diesel Tank	470	Earthen Dike	Weekly	Direct Vision Gage	Routinely
	△	19	Glycol Tank	2,068	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	18	Lube Oil Tank	2,068	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	17	Glycol Tank	2,068	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	21	Pipeline Liquids Tank	2,588	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	22	Lube Oil Tank	6,076	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	23	Lube Oil Tank	6,076	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	24	Methanol Tank	3,738	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	27	Glycol Tank	940	****	Weekly	Direct Vision Gage	Routinely
	△	28	Used Oil Tank	1,024	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	29	Used Oil Tank	1,468	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	30	Used Oil Tank	1,000	Basement of MER #1	Weekly	Direct Vision Gage	Routinely
	△	31	Used Oil Tank	3,000	Concrete Dike	Weekly	Direct Vision Gage	Routinely
	△	32	Diesel Tank (Portable)	80	Earthen Dike	Weekly	Direct Vision Gage	Routinely
	△	33	Wastewater Tank	1600	Double Wall Vessel	Daily	Direct Vision Gage	Routinely
In-ground Storage Tanks	△	3	Wastewater/Oil Tank	3,384	Earthen Dike	Daily	Gage Stick	Routinely
	△	15	Wastewater/Oil Tank	46,888	****	Daily	Gage Stick	Routinely
	△	13	Wastewater/Oil Tank	1,560	Earthen Dike	Daily	Gage Stick	Routinely
	△	25	Used Oil Tank	160	****	Weekly	Gage Stick	Routinely
	△	26	Used Oil Tank	752	****	Weekly	Gage Stick	Routinely

	Dwg. ID	Facility #	Contents	Containers	Secondary Containment *	Container ** Area Inspections
Container Storage Areas	△	–	Waste Storage	Drums	Earthen Dike	Weekly
	△	–	Product Storage ***	Drums	****	Weekly

* Stormwater collecting in diked areas may be released after visual observation indicates that no residual product or sheen exists. Document the discharge.

** Leaks/problems discovered should be fixed promptly and documented on the Environmental Facility Inspection form according to SOP #10-D. Keep inspection logs in the Environmental Filing System.

*** Products stored at this facility generally include diesel, gasoline, glycol, lubricating oil, mercaptan, methanol, paints and solvents.

**** Spill control measures consist of one or more of the following: diversion structures, empty drums, absorbent materials, booms, spill pads, rakes, shovels and portable pumps.

Emergency Spill Response Equipment

Dwg. ID	Equipment Location	Inspections
⊕	First Aid Kits	Monthly
●	Eye Wash Station	Monthly
⊘	Fire Extinguishers (Number at this location)	Monthly
○	Fire Blankets	Monthly
●	Spill Response Equipment (At a minimum: absorbent material, booms, spill pads, rakes, shovel, portable pump, PPE, empty drums.)	Monthly
●	Emergency Generator	Monthly
●	Emergency Shutdown Activation Stands	Semi-Annually

Station Security and Lighting

The station is completely surrounded by fence. The main gate is open from 7:00 am - 4:00 pm, Monday through Friday.
All visitors must:
- Sign registry at Office Building and Operator A Office.
- Be briefed on emergency procedures, including Primary and Secondary Assembly Areas and Primary Evacuation Routes.

The station has adequate lighting with flood lights throughout the station.

Communication Equipment

Plant Phone System consists of:
- A public system and a company owned microwave system.
- Phone system with horn - located in Office, MER #1, MER #2, and the Auxiliary Building.
- Phone system with light - located in MER #1 and MER #2.

Two Way Radio System consists of:
- Radio in Office Building.
- Radio in Operator 'A' Office.

Air Horns for signaling emergencies are located at MER #1 and MER #2 and are routinely tested.

Spill History

Spills occuring at this facility on July 06, 1993 and December 12, 1994 required implementation of the contingency plan. The spills were controlled, appropriate agencies notified and corrective actions taken to prevent the spill incident from recurring. The facility's Environmental File, 9.2 Reportable Spills and Releases, contains copies of the reports and corrective actions taken.

DRIVING DIRECTIONS TO STATION

From Olpe, Kansas, travel 3 miles north on State Highway 99. Turn west on Road 90 and travel 1.5 miles.

LOADING /UNLOADING AREAS

Dwg. ID	The Primary Emergency Coordinator shall ensure company employees:
(truck)	• Supervise all loading and unloading operations. • Utilize drip pans at the hose connections while loading /unloading liquids. • Inspect all outlets prior to leaving the loading areas to prevent possible leakage from the truck, tanks and containers.

Contingency and Response

[illegible]

Spills that meet the following criteria must be reported immediately to Environmental Compliance Houston.
- Creates a sheen on water.
- One (1) pound or more of solid waste spilled on land.
- Five (5) gallons or more of a liquid spilled on land.

[illegible]

First Responder – Emergency /Spill Discovery
- Assess the situation to determine if the situation poses an immediate threat to human health or the environment.
- Identify hazardous substances involved, if any.
- Report the emergency or spill to the Emergency Coordinator immediately.
- Standby at a safe distance and keep others away.
- Activate emergency shutdown, if necessary.

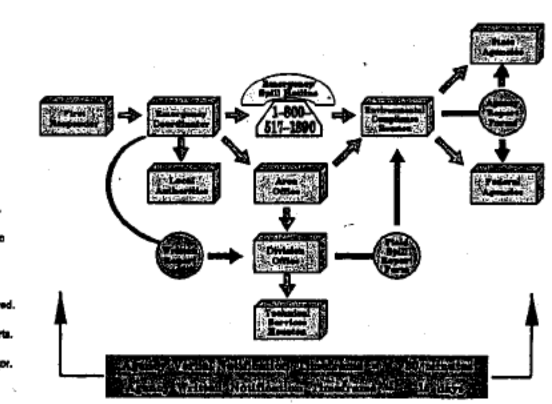
Emergency Response Coordinator
- Assess situation for potential threat to human health and the environment.
- Implement evacuation, if necessary.
- Activate emergency shutdown, if necessary.
- Ensure personnel safety.
- Control source as conditions warrant.
- Coordinate pipeline /plant operations.
- Notify local authorities, if necessary.
- Notify Area /Division /Environmental Compliance. Report spill information according to the Environmental Standard Operating Procedures.
- For fires or explosions, refer to the emergency plan section of the Operations and Maintenance Plan.
- For spills:
  - Ensure that waste or product which may be incompatible with a released material is kept away from the affected area.
  - Keep any potential ignition source away from emergency area, if spilled material is flammable.
  - Apply water fog over spill to reduce vapor, if necessary.
  - Minimize affected area with appropriate containment or diking.
  - Assemble required spill response equipment as required (protective clothing, gear, heavy equipment, pumps, absorbent mat'l, empty drums, etc.)
  - Coordinate cleanup.
  - Place spilled material in appropriate containers, in accordance with the Environmental Standard Operating Procedures.
  - Label and store containers in accordance with the Environmental Standard Operating Procedures.
  - Coordinate waste disposal and equipment decontamination with Environmental Compliance.
- Terminate response.
- Ensure that all emergency response equipment is fully functional. Any equipment that cannot be reused shall be replaced.
- Initiate internal written report or Field Spill Report Form.
- For spills of PCB's, contact Environmental Compliance for special spill response requirements related to PCB spills.

Local Authorities
- Coordinate access and security.
- Assist with emergency hazardous materials handling, fire fighting, etc.

Area /Division
- Obtain equipment and personnel as needed.
- Assist with pipeline operations.
- Send internal written report within 3 days to Environmental Compliance.
- Notify Technical Services - Houston.

Environmental Compliance
- Notify State and Federal Agencies, as required.
- Coordinate sampling activities.
- File State and Federal Agency written reports.
- Coordinate waste disposal and equipment decontamination with Emergency Coordinator.

[illegible]



PHOTOCOPY
ORIGINAL ON FILE AT E.H.S. DEPARTMENT
PANHANDLE EASTERN PIPELINE COMPANY

REVISION #:	REVISION BY:	DATE:
1	T. Jenkins	09-26-00

PANHANDLE EASTERN PIPE LINE COMPANY
5400 Westheimer Ct. Houston, TX 77056-5310

OLPE COMPRESSOR STATION
Lyon County, Kansas
966 Road 90, Olpe, Kansas 66865
Start of Operation Date: 1936
SPCC Plan,
Preparedness, Prevention and Contingency Plan,
Emergency Procedures

DRAWN BY: TMR	DATE: 11-20-98
CHECKED BY:	REVISION DATE: 09-26-00
SCALE: NTS	OLPESPCC
SHEET 1 OF 1	

olpespcc.dgn 09-00
olpe.ctl

ATTACHMENT 5

PANHANDLE EASTERN CORPORATION

POSITION DESCRIPTION

Position Title:	Area Supervisor	**Job No.:**	[redacted]
Reports To:	Area Superintendent	**Date:**	EX. 6 PII
Department:	Transmission	**FLSA Status:**	
Division:	Field Operations	**Approval:**	
Section:	Area	**Approval:**	

Position Summary:

The Area Supervisor reports to the Area Superintendent as do the Area Foreman (1 - 3), other Area Supervisors (1 - 4), and some area technicians and administrative staff. Areas are geographic territories of pipeline, compressor, measuring facilities, gas treating facilities and storage facilities. Through subordinate positions incumbent operates and maintains facilities associated with gathering, treating, transporting, storing and delivering gas. Dimensions: Area is comprised of an operating budget of $4.0 MM, a capital budget of $100,000, and 45 -90 employees. Staff is comprised of 7 - 20 non-exempt employees.

Duties and Responsibilities:

1. To supervise and direct the operation and maintenance activities of the Area. Monitors the operation, maintenance and construction activities of the Area to ensure resources are available when needed, projects are on schedule, that gas receipt/delivery volumes are met, that Area standards for efficiency are met, and that projects are being done in accordance with original specifications. Problems are reviewed with the Area Superintendent along with corrective actions taken.

2. Incumbent assists the Area Superintendent in establishing goals and objectives for Area gas volume deliveries, operations and maintenance standards, staffing levels, job performance, and facility changes. Incumbent will develop action plans to meet Area, Division and Department goals.

3. Reviews subordinate "work plans" and prepares additional information for Superintendent to produce the Area "work plan" and annual budgets. Incumbent meets with Superintendent monthly to review actual results versus planned activities and to adjust future activities to an expenditure level consistent with operations and to meet company operation and maintenance requirements

4. Incumbent implements Area safety program to provide information and training to our employees for performing their job functions; to inform the general public on the potential dangers of a natural gas pipeline and associated facilities through public awareness programs; to conduct monthly safety meetings; and to assist the area safety committee resolve safety problems.

5. Incumbent maintains the Area "emergency plan" and conducts training and simulated emergencies to ensure proper response to any pipeline failure. Incumbent with Superintendent, subordinates, safety committee, and/or Division Technical Staff, investigates accidents for cause and prevention.

6. Incumbent implements personnel policies - -job performance standards, training programs, discipline and reward practices, identifies employees for advancement, listens to employee concerns, promotes "teamwork" and complies with employee relations policies (PEPI.- "Articles of Agreement"). Incumbent investigates personnel issues to ensure that facts are known prior to resolution. On issues not clearly defined incumbent consults with the Area Superintendent, Employee Relations Representative, the Division Administrative Superintendent, or the Division Manager.

7. Incumbent works with Superintendent and Division staff to communicate company policies and procedures to employees. Incumbent trains employees to perform activities consistent with the stated policies and procedures.

8. Incumbent with subordinates prepares detailed plans for facility outages, pipeline and engine maintenance. Plans are reviewed with Superintendent and/or Division Staff to ensure scope of work is complete, safety precautions are complete, required personnel are notified, dates for returning to service are realistic, and facility outages do not adversely affect ability to transport gas.

9. Incumbent maintains good public relations with landowners, producers, other pipelines, utilities and the general public. Works to maintain a good corporate image and minimize damages relating to construction or maintenance work. Receives inquires from the public concerning our facilities and responds quickly to ensure safety to our employees and facilities and the general public.

10. Incumbent monitors "operation and maintenance agreements" and contracts for services to ensure that both parties are meeting the contract requirements . Problems are discussed with contractor, and if unable to resolve will involve Superintendent or Division Administrative Supervisor.

11. The incumbent functions without daily direction from Superintendent provided that objectives are met and that activities are consistent with approved work plans and budgets. Incumbent works with other Area Supervision to provide 24 hour response to problems. Incumbent works directly with other Area Supervisors, Division Engineers and Technicians, Construction Engineering, Employee Relations Representative, Administrative Supervisors and Administrative Superintendent to resolve construction, operations, maintenance and employee issues.

Minimum Qualifications:

Basic education with specialized course work or training in physical sciences, mathematics, mechanical technology, and personnel management. Finance and business administration courses helpful. Five years of responsible operation, maintenance, and administrative experience with two years of supervisor experience.

Reporting Positions:

Total annual payroll of reporting positions up to $500,000.

Area Technicians (1 - 20): Performs work in specific functions (cathodic protection, controls and/or measurement) ensuring compliance with company policies and standards.

Hourly Personnel (5 -20): Performs various tasks with the area to maintain gas flow and maintenance of facilities.

Administrative Staff (1 - 5): Perform various tasks related to reports and systems development and maintenance.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
1000 SW JACKSON, SUITE 320, TOPEKA, KANSAS 66612-1366

USED OIL
COMPLIANCE INSPECTION CHECKLIST

General [X] Routine [] Complaint

EPA ID KSD 984 972 737 Time 10:45 a.m. Date November 26, 2001

Facility Name CMS Energy/Panhandle Eastern Pipeline District Southeast

Street 985 Road 90 City Olpe, Kansas ZIP 66865

Mailing Address (if different than above) P.O. Box 4967, Env. Services, Houston, TX 77210-4967

County Lyon Phone (620) 475-3226

Contact(s) Tom Jenkins - Area Supervisor and Victoria Wagner - Env. Coord. (713) 989-7459

Inspector(s) Victoria S. O'Brien SIC: 4922

Type of Business Natural Gas Compressor Station Number of Employees 18

Has the company declared any information/processes as trade secrets (KSA 65-3447)? No
If yes, explain:

TYPE OF STORAGE CONTAINERS:
[] Drums [X] Tanks [ ] Other:

FACILITY TYPE:
[X] Generator
[] Transporter / Transfer Facility
[] Used Oil Burner (Off-Spec Fuel)
[] Collection Center / Aggregation Point
[] Used Oil Processor / Re-Refiner
[] Used Oil Marketer

	Off-Spec Used Oil	On-Spec Used Oil	Oil Filters
Types of Oils: (i.e., motor oil, cooling oil, cutting oil, compressor oil	Motor, Compressor, and Coolant Oil		Oil Filters
Amount generated per month:	600 to 800 Gallons		≈100 Per Year
Amount received from off-site sources:	None		None
Amount presently in storage:	<1000 Gallons		None
Accumulation time:	<Two Months		Not Applicable
Present disposal methods:	Greensburg Oil Services		Drained and 50% Landfilled and 50% Recycled

SUBPART C: STANDARDS FOR USED OIL GENERATORS

	YES	NO	NA
1. Does facility mix hazardous waste with used oil? [40 CFR, 279.21]	[ ]	[X]	[ ]
a. If yes, does facility manage mixture as a hazardous waste? [K.A.R. 28-31-4(p)]	[ ]	[ ]	
A. If no, does the facility fall under the SQG exemption?	[ ]	[ ]	
2. Does facility store used oil on-site? [40 CFR, 279.22],	[X]	[ ]	
If yes,			
a. Is the storage unit(s) in good condition? [40 CFR, 279.22(a)]	[X]	[ ]	
b. Is the storage unit(s) free from leaks? [279.22(b)]	[X]	[ ]	
c. Is the storage unit(s) and/or fill pipe(s) labeled with the words "USED OIL?" [279.22(c)]	[X]	[ ]	
3. Has there been a release of Used Oil? [40 CFR 279.22(d)]	[ ]	[X]	
If yes,			
a. Was the leak stopped? [40 CFR 279.22(d)(1)]	[ ]	[ ]	[ ]
b. Was the release contained? [40 CFR 279.22(d)(2)]	[ ]	[ ]	
c. Was the release cleaned-up and managed properly? [40 CFR 279.22(d)(3)]	[ ]	[ ]	
d. If necessary, was the storage unit repaired or replaced? [40 CFR 279.22(d)(4)]	[ ]	[ ]	[ ]
4. Does facility burn used oil on-site? [40 CFR 279.23]	[ ]	[X]	
If yes,			
a. Does facility burn only used oil that the generator/operator generates or used oil received from household do-it-yourself used oil generators? [40 CFR 279.23(a)]	[ ]	[ ]	
b. Is the space heater designed to have a maximum capacity of not more than 0.5 million Btu per hour? [40 CFR 279.23(b)]	[ ]	[ ]	
c. Is the combustion gases from the space heater vented to the ambient air? [40 CFR, 279.23(c)]	[ ]	[ ]	
5. Does generator self-transport used oil to an approved collection site? [40 CFR 279.24(a)]	[ ]	[X]	
If yes,			
a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [40 CFR 279.24(a)(1)]	[ ]	[ ]	
b. Does the generator transport no more than 55 gallons of used oil at any time? [40 CFR 279.24(a)(2)]	[ ]	[ ]	

NOTE: IF NO TO QUESTION 5-a OR 5-b, COMPLETE TRANSPORTER CHECKLIST.

c. Does the generator transport used oil to a used oil collection center that is registered, licensed, permitted or recognized by the state to handle used oil? [40 CFR 279.24(a)(3)]	[ ]	[X]	
6. Does the generator self-transport used oil to an aggregate collection site owned by the generator? [40 CFR 279.24(b)]	[ ]	[X]	
If yes,			
a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [40 CFR 279.24(b)(1)]	[ ]	[ ]	

	YES	NO	NA
b. Does the generator transport no more than 55 gallons of used oil at any time? [40 CFR 279.24(b)(2)]	[ ]	[ ]	
c. Does the generator transport used oil to a used oil collection center that is registered, licensed, permitted or recognized by the state to handle used oil? [40 CFR 279.24(b)(3)]	[ ]	[ ]	

NOTE: IF TRANSPORTING MORE THAN 55 GALLONS PER TRIP, COMPLETE THE TRANSPORTER/TRANSFER STATION CHECKLIST

7. Does the generator have their used oil reclaimed under a tolling (contractual) agreement? [40 CFR 279.24(c)]	[ ]	[X]
If yes,		
a. Does the tolling (contractual) agreement indicate the type of used oil and the frequency of shipments? [40 CFR, 279.24(c)(1)]	[ ]	[ ]
b. Is the vehicle used to transport the used oil to the processing/re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor/re-refiner? [40 CFR, 279.24(c)(2)]	[ ]	[ ]
c. Is reclaimed oil returned to the generator? [40 CFR, 279.24(c)(3)	[ ]	[ ]

Used Oil Generator Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

On November 26, 2001, I conducted a routine hazardous waste compliance inspection of CMS Energy/Panhandle Eastern Pipe Line, a natural gas compressor station, located at 985 Road 90, Olpe, Kansas. The EPA identification number assigned to the site is KSD 984 972 737. Facility contacts for the inspection were Mr. Tom Jenkins - Area Supervisor and, via telephone, Ms. Victoria Wagner - Environmental Coordinator based in Houston, Texas.

The facility generates used motor, compressor, and coolant oil that is picked up periodically for reuse by Greensburg Oil Services out of Greensburg, Kansas. Used oil filters generated at the site are drained and then, depending on the type of filter, either landfilled or sent to NAPA, Emporia, Kansas, to be recycled.

No violations of the used oil regulations were cited as a result of my inspection.