



Florida Department of Environmental Protection

Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590

File 12/31

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

DEC 31 2008

Mr. Harvey Hall, Branch Operations Manager
Univar USA, Inc.
155 Ellis Road South
Jacksonville, Florida 32254

Re: Univar USA, Inc.
EPA/DEP ID: FL0 000 596 866
Duval County – Hazardous Waste

Dear Mr. Hall:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection (DEP) at your facility on August 6, 2008. Enclosed is the report that documents this inspection.

Based on this inspection, your facility was found to be in violation of Florida Statutes and Rules concerning hazardous waste management. Subsequent to the inspection, your facility submitted information stating that the violations have been corrected. Since your facility has returned to compliance, no enforcement action will be taken.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.807.3381.

Sincerely,

Jabe Breland III
Environmental Specialist II
Hazardous Waste Section

DBP

Enclosure

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Compliance
FACILITY NAME: Univar USA, Inc.
DEP/EPA ID #: FL0 000 596 866
STREET ADDRESS: 155 Ellis Road South, Jacksonville, Florida 32254
MAILING ADDRESS: same as above
COUNTY: Duval PHONE: 904.783.7902 DATE: 8/6/08 TIME: 9:00 a.m.

<u>HW Facility Status</u>	<u>Used Oil Facility Status</u>	<u>Hg Facility Status</u>
<input type="checkbox"/> Non-handler	<input type="checkbox"/> Generator	<input type="checkbox"/> Exempt
<input type="checkbox"/> CESQG	<input type="checkbox"/> Transporter	<input type="checkbox"/> Generator
<input type="checkbox"/> SQG	<input type="checkbox"/> Transfer facility	<input checked="" type="checkbox"/> Transporter
<input checked="" type="checkbox"/> LQG	<input type="checkbox"/> Marketer	<input type="checkbox"/> Hg recovery facility
<input checked="" type="checkbox"/> Transporter	<input type="checkbox"/> Processor	<input type="checkbox"/> Hg reclamation facility
<input type="checkbox"/> Transfer facility	<input type="checkbox"/> On-spec. burner	
	<input type="checkbox"/> Off-spec. burner	
<input type="checkbox"/> TSD	<input type="checkbox"/> Filter generator	<u>PCW facility status</u>
	<input type="checkbox"/> Filter transporter	<input type="checkbox"/> Producer
<input type="checkbox"/> SQH	<input type="checkbox"/> Filter transfer facility	<input type="checkbox"/> Transporter
<input type="checkbox"/> LQH	<input type="checkbox"/> Filter processor	<input type="checkbox"/> Recovery facility

2. RESPONSIBLE OFFICIAL: Harvey Hall, Facility
3. INSPECTION PARTICIPANTS: Harvey Hall, Robert Potochnick,
Craig Frost - Univar
Jabe Breland, Jenna Perry - DEP
4. LATITUDE/LONGITUDE: N 30° 19' 24.8" / W 081° 44' 32.9"
5. TYPE OF OWNERSHIP: private
6. SIC CODE: 5169
7. GLOSSARY OF TERMS:
CFR - Code of Federal Regulations
F.A.C. - Florida Administrative Code
F.S. - Florida Statutes

Univar USA, Inc.
Hazardous Waste Inspection
of 8/6/08

PROCESS DESCRIPTION (Potential Violations Listed in Bold):

Univar USA Inc (Univar) was inspected on August 6, 2008, as an unannounced hazardous waste compliance inspection. Univar has been operating on site since 2001 and has 22 employees. The facility consists of a warehouse, aboveground tank farm, storage yard, and several offices. The facility notified the DEP as both a Transporter and Large Quantity Generator of hazardous waste.

Univar is a distributor of chemicals and industrial solvents. The warehouse, tank farm, and storage yard are used to store industrial chemicals for distribution, including solvents and corrosives. The facility receives product from the manufacturer through rail car and tanker truck, and redistributes them to their customers. Hazardous waste is generated at the facility if the container leaks or breaks, exceeds its shelf life, is off spec, or when any tank lines/sumps are flushed.

Warehouse:

Products are stored in the main warehouse. Additionally, off-specification and other hazardous wastes are stored in the warehouse prior to disposal.

90-day Storage Area:

This area is located in the north west corner of the warehouse. At the time of inspection there was one 55-gallon drum that contained about 10-gallons of D001 hazardous waste from a line flush. This container was properly labeled and closed at the time of inspection. Waste from the facility's transporter activities is also stored in this area. No transporter waste was being stored at the time of inspection. According to Mr. Robert Potochnik, Operations Manager, transporter waste is not stored on site for longer than 24-hours. In most cases the waste is sent out within 12-hours.

Laboratory:

Univar operates a quality assurance laboratory. This laboratory is located in the main warehouse. No wet chemistry is performed in this lab; therefore, no waste solvents are generated. The samples that are taken are eventually recombined with the product or poured into a 90-day hazardous waste container of the same contents.

Facility Yard and Storage Area:

To the north of the main building is the facility yard. The yard contains several drums and containers that are full of product and waiting to be shipped off to customers. There are also several empty drums that are stored outside waiting to be filled with product or waiting to be sent for reconditioning and cleaning.

Tank Farm:

Also located to the north of the facility is the Tank Farm. The tank farm consists of 39 tanks separated into different areas depending on characteristics of the chemical being stored. Product flammable liquids are stored in a covered storage area with secondary containment. Other flammable solvents are stored under a large pole barn inside several different tanks. Each tank had secondary containment. There are central floor trenches designed to catch any spill that occurs outside of the secondary containment, such as from a truck. At the time of the inspection, there was an accumulation of water in these trenches. According to Mr. Craig Frost, Tank Farm Supervisor, these trenches are cleaned out as necessary and disposed of as a hazardous waste to ensure compliance. Also in this area there was a damp absorbent pad (Photo 1), and the facility was unaware of what it was used for. **Failure to make a hazardous waste determination is a violation of 40 CFR 262.11.** Also in this area was oil dry used for spills. The facility is reminded that any oil dry that is used for spills of used oil or chemicals should also go through a hazardous waste determination and properly disposed of.

Records Review:

The facility's contingency plan was incomplete. **The facility failed to include the emergency contacts' home addresses, which is a violation of 40 CFR 265.52(d).** The plan did not have an explosion response plan, which is a violation of 40 CFR 265.52(a). The facility's weekly container inspection log failed to contain the number of containers in its hazardous waste storage area, which is a violation of Section 62-730.160(6). Waste manifests corresponding to waste generated at Univar did not include the generator phone number, which is a violation of 40 CFR 262.20.

The facility submitted its proof of liability insurance to the DEP in order to operate as a transporter, and carries a copy in each of its vehicles. Other transporter records were available and in order.

Univar notified the FDEP on March 14, 2008, as a Transporter and a Large Quantity Generator (LQG) of hazardous waste. Based on records reviewed during the inspection it was determined that Univar was operating as a Transporter and LQG of hazardous waste. The facility should be aware that as a LQG, hazardous waste generated onsite should not be stored longer than 90-days. All transporter waste, and waste that is generated from onsite activities, is sent to Univar's hazardous waste transfer facility in Tampa where it is then shipped to Pollution Control (TND000772186) for final disposal/treatment.

Univar USA, Inc. has been assigned the EPA identification number: FL0 000 596 866. Please use this number on all hazardous waste manifests and on all correspondence with the DEP.

SUMMARY OF POTENTIAL VIOLATIONS AND CORRECTIVE ACTIONS:

Section 62-730.160(6) F.A.C. – Weekly Container Inspections

VIOLATION:

The facility failed to list the number of containers on its 90-day hazardous waste container inspection log as well as the time of the inspection.

CORRECTIVE ACTION:

On October 6, 2008, the facility sent documentation to the DEP stating that it added a column on the inspection log for the numbers of containers in its 90-day storage area, as well as the time of the inspection. No further action is required.

40 CFR 262.11 – Hazardous Waste Determination

VIOLATION:

The facility failed to make a hazardous waste determination on an absorbent pad found in the tank farm. At the time of inspection the facility was unaware of the absorbent was used for.

CORRECTIVE ACTION:

On October 6, 2008, the facility sent documentation to the DEP stating the absorbent pad was used to soak up a small amount of glycol ether. The facility has properly contained and disposed of this material. No further action is required.

40 CFR 262.20 Appendix – Hazardous Waste Manifest

VIOLATION:

The facility failed to completely fill out its generator information on EPA's Manifest 8700-22 form.

CORRECTIVE ACTION:

On October 6, 2008, the facility sent documentation to the DEP stating that it added its telephone number to its manifest system.

40 CFR 265.52(a) – Contingency Plan

VIOLATION:

The facility failed to include an explosion plan in its Contingency Plan.

Univar USA, Inc.
Hazardous Waste Inspection
of 8/6/08

CORRECTIVE ACTION:

On November 24, 2008, the facility sent documentation to the DEP stating that it added an explosion plan to its Contingency Plan. This documentation has been put in the file. No further action is required.

40 CFR 265.52(d) – Contingency Plan


VIOLATION:

The facility failed to include home addresses of its emergency contacts in its Contingency Plan.

CORRECTIVE ACTION:

This violation was corrected at the time of the inspection. No further action is required.

Site Inspector:

 12/30/08


Jabe Breland III Date
Environmental Specialist II
Hazardous Waste Section

Site Inspector:

 12/30/08

Jenna Perry Date
Environmental Specialist II
Hazardous Waste Section

Approved by:

for  12/30/08

Vicky G. Valade Date
Environmental Manager
Hazardous Waste Section

Approved by:

 12/30/08

Ashwin B. Patel Date
Hazardous Waste Supervisor
Hazardous Waste Section



Photo 1 – absorbent pad

Photo by: Jabe Breland

GENERATOR CHECKLIST

Facility Name: Univar USA, Inc Date: 08/06/08
 Facility Representative: Harvey Hall Facility ID #: FL0 000 596 866
 SIC Codes: 5169 Inspector: Jabe Breland

40 CFR 262 Subpart A -- General Standards

1. Describe the facility's hazardous waste streams:

WASTE DESCRIPTION	EPA Waste Codes	Generation Rate	Disposal Facility and EPA ID	Correct ID?	Testing or Process Knowledge
caustics	0002	5,000 lbs/mo	Pollution Control TND000772186	✓	pk
flammable, out of date products	0001	150 lbs/month	"		
			"		

(describe discrepancies in waste identification in narrative)

2. Has the facility obtained an EPA ID number? (40 CFR 262.12) Y X N
3. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? Y X N
4. Are any hazardous wastes treated or disposed of on site?
Describe in narrative. Y N X
5. Is the facility exempt from hazardous waste permit requirements?
Describe in narrative. Y N X

Facility: Univar USA, Inc
 Date: 08/06/08

40 CFR 262 Subpart B -- The Manifest

1. Does the facility use a manifest for all its hazardous wastes? (262.20) Y X N
2. Is the facility using the correct form (EPA 8700-22; OMB #2050-0039)? Y X N
3. Does the facility ship by rail or water? (If so, check 262.23(c)) Y N X
4. Is the manifest filled out properly? Y N X

Item No.:

- | | | | |
|--------|---|----------------------------|-----------|
| 1. | -Generator EPA ID # | Y <u>X</u> N <u> </u> | |
| | -5 digit manifest document # | Y <u>X</u> N <u> </u> | |
| 3. | -Generator name and mailing address | Y <u>X</u> N <u> </u> | |
| 4. | -Generator phone # | Y <u> </u> N <u>X</u> | Violation |
| 5-8. | -Transporter names and ID #s | Y <u>X</u> N <u> </u> | |
| D-F. | -Transporter phone # (state requirement) | Y <u>X</u> N <u> </u> | |
| 9. | -TSD name and mailing address | Y <u>X</u> N <u> </u> | |
| 10. | -TSD # EPA ID # | Y <u>X</u> N <u> </u> | |
| H. | -TSD Phone # (state requirement) | Y <u>X</u> N <u> </u> | |
| 11. | -DOT description of the waste, including hazard class, ID # and packaging group | Y <u>X</u> N <u> </u> | |
| 12. | -Container # and type | Y <u>X</u> N <u> </u> | |
| 13-14. | -Quantity of waste and units | Y <u>X</u> N <u> </u> | |
| I. | -EPA waste code (state requirement) | Y <u>X</u> N <u> </u> | |
| K. | -Handling codes (state requirement) | Y <u>X</u> N <u> </u> | |
| 16. | -Name, handwritten signature of generator and date | Y <u>X</u> N <u> </u> | |
| 17-18. | -Name, handwritten signature of transporter and date | Y <u>X</u> N <u> </u> | |
| 19. | -Are any manifest discrepancies noted? | Y <u> </u> N <u>X</u> | |
| 20. | -Name, handwritten signature of TSD and date | Y <u>X</u> N <u> </u> | |

Number of manifests examined 7
 Number of errors

Note manifest document numbers and dates of manifests with errors below:

Manifest #	Date	Destination	Error(s)

5. Have any exception reports been filed? (262.42) Y N X
 If so, did exception reports include legible copy of manifest and cover letter? Y N N/A X
6. Are manifests retained for 3 years? Y X N

40 CFR 262 Subpart C -- Pre Transport Requirements

1. Does the facility accumulate the waste on-site prior to treatment or disposal? Y X N _____
Select the applicable accumulation units:
Containers
2. Are containers used to ship the waste off-site? Y X N _____
3. Are any containers on-site prepared for shipment? Y _____ N X _____
a. If so, are the containers appropriate for the waste? (262.30) Y _____ N _____ N/A X _____
b. Are the correct diamond-shaped DOT hazard class container labels used? (262.31) Y _____ N _____ N/A X _____
c. Are containers of 110 g or less marked with the correct DOT shipping name and number? Y _____ N _____ N/A X _____
Is a label with the language required under 262.32(b) used? Y _____ N _____ N/A X _____
Is the generator's name, address and manifest document number on the label? Y _____ N _____ N/A X _____
d. Are placards available to be provided to the transporter? (262.33) Y X N _____ N/A _____
e. Are bulk packagings used (over 400 kg solid or 118 g liquid)? Y X N _____ N/A _____
f. Are they marked and placarded properly? Y X N _____ N/A _____

40 CFR 262 Subpart C -- Accumulation Requirements

1. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) (Complete tank, container and/or drip pad checklists for units accumulating waste.) Y X N _____
2. If not, has the facility been issued an extension by the Department? (262.34(b)) Y _____ N _____ N/A X _____
3. Is each container marked with the beginning date of accumulation? (262.34(a)(2)) Y X N _____
4. Is each container and tank marked with the words "Hazardous Waste"? (262.34(a)(3)) Y X N _____
5. Are satellite accumulation points used? Describe in narrative. Y _____ N X _____
6. Are satellite containers closed ((262.34(c)) and marked with the words "hazardous waste" or other words that describe the contents? Y _____ N _____
7. Do satellite accumulation points hold 55 gallons of waste or less? Y _____ N _____
8. If not, is the excess marked with the date the excess waste began accumulating? (The date must be within 3 days of the date of inspection (262.34(c)(2)) Y _____ N _____ N/A X _____

Facility: Univar USA, Inc

Date: 08/06/08

40 CFR 262 Subpart C -- Personnel Training -- (265.16)

1. Do facility personnel complete hazardous waste training? Y X N _____
Comments:
2. Is the trainer adequately trained in hazardous waste management procedures? Y X N _____
3. Does the training cover safety? Y X N _____
4. Does the training cover emergency response procedures, including equipment handling and inspection? Y X N _____
5. Does the training cover hazardous waste identification and handling procedures? Y X N _____
6. Does the facility maintain personnel training records? Y X N _____
7. Does the facility maintain job titles and position descriptions for employees managing hazardous waste? Y X N _____
8. Do the job descriptions include the requisite skills, education and experience? Y X N _____
9. Do the job descriptions include a list of the positions' duties? Y X N _____
10. Are people trained within 6 months of hiring? Y X N _____
11. Do they work unsupervised prior to training? Y _____ N X
12. Is training reviewed annually? Date of last training 07/31/08 Y X N _____
13. Are records maintained for three years? Y X N _____

265 Subpart C -- Preparedness and Prevention

1. Is there evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? (265.31) Y _____ N X
2. Does the facility have an internal communication or alarm system? (265.32(a)) Y X N _____
3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? (265.32(b)) Y X N _____
4. Describe fire control equipment. Is it adequate? (265.32(c)) Y X N _____
5. Is spill control and decontamination equipment present? (265.32(c)) Y X N _____

Facility: Univar USA, Inc
Date: 08/06/08

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (265.32(d)) Y X N _____
7. Is the emergency equipment inspected and tested periodically? Y X N _____
Frequency? Monthly
8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (265.35) Y X N _____
9. Has the facility made emergency response arrangements with the following: (265.37)
- | | |
|--------------------------------------|--------------------|
| Fire Department: _____ | Y <u>X</u> N _____ |
| Police: _____ | Y <u>X</u> N _____ |
| Hospital: _____ | Y <u>X</u> N _____ |
| Emergency Response Contractor: _____ | Y <u>X</u> N _____ |
10. If not, has the facility attempted to do so and is the refusal documented? Y _____ N _____

265 Subpart C – Contingency Plans and Emergency Response

1. Does the facility have a contingency plan? (265.51) Y X N _____
2. Is it at the facility and easily available? (265.53) Y X N _____
3. Does the plan include:
- | | | | |
|--|-----------|--------------------|-----------|
| Fire Response Procedure: | N/A _____ | Y <u>X</u> N _____ | |
| Spill Response Procedures: | N/A _____ | Y <u>X</u> N _____ | |
| Explosion Response Procedures: | N/A _____ | Y _____ N <u>X</u> | Violation |
| A description of arrangements with local authorities: | N/A _____ | Y <u>X</u> N _____ | |
| Emergency Coordinators: (Name) <u>Robert Potochnick</u> | | Y <u>X</u> N _____ | |
| Addresses and telephone numbers of Emergency Coordinators: | | Y _____ N <u>X</u> | Violation |
| Emergency equipment list: | | Y <u>X</u> N _____ | |
| Specifications and capabilities of emergency equipment: | | Y <u>X</u> N _____ | |
| Locations of emergency equipment: | | Y <u>X</u> N _____ | |
| An evacuation plan and routes: | | Y <u>X</u> N _____ | |
| Evacuation/alarm signals: | | Y <u>X</u> N _____ | |
4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? Y X N _____
5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (265.53) Y X N _____
6. Is the emergency coordinator authorized to commit funds for incident response? Y X N _____

Facility: Univar USA, Inc

Date: 08/06/08

40 CFR 262 Subpart D -- Record keeping and Reporting

1. Is the generator keeping the following records:

Biennial Reports (262.41)
Exception reports (262.42)
Test Results:

N/A Y X N
N/A X Y N
N/A X Y N

2. Where are records kept? Personnel office
3. Who is in charge of keeping records? Name Robert Potochnick
Title Operations Manager
4. Any additional reporting, such as contingency plan implementation reports? (262.43) NA X Y N
5. Are records kept for a minimum of 3 years? Y X N

40 CFR 262 Subpart E -- Exports N/A X

1. Has the facility exported any hazardous waste? Y N
2. Has the exporter notified EPA 60 days prior to the initial shipment? Y N
3. Has the receiving country consented to receive the waste? Y N
4. Has a copy of the EPA Acknowledgment of Consent accompanied the shipment? Y N
5. Did the shipment conform, and was the manifest completed as required by 40 CFR 262.54? Y N
6. Has the exporter received confirmation of delivered shipment? Y N
7. Has the exporter submitted an annual report to EPA? Y N
8. Are all records kept a minimum of three years? (262.57) Y N

40 CFR 262 Subpart F -- Imports N/A X

1. Has the facility imported any hazardous waste? Y N
2. Has the manifest been completed per 262.60(b)? Y N

Facility Name: _____
Inspector: _____
Date: _____

40 CFR Part 265 Subpart I - Use and Management of Containers

1. Are the containers in good condition (265.171)?
(Check for leaks, corrosion, bulges, etc.) Yes ☒ No ☐
2. If a container is found to be leaking, does the operator
transfer the hazardous waste from the leaking container? Yes ☒ No ☐
3. Is the waste compatible with the containers and/or its
liner (265.172)? Yes ☒ No ☐
4. Are the containers kept closed except when adding or
removing wastes (265.173(a))? Yes ☒ No ☐
5. Are containers holding hazardous waste opened, handled or stored
in such a manner as to cause the container to rupture
or leak (265.173(b))? If yes, explain using narrative. Yes ☐ No ☒
6. Are each of the containers inspected at least weekly? (265.174) Yes ☒ No ☐
Are records kept including: (62-730.160 (6) F.A.C.)
Date? Yes ☒ No ☐
Time? Yes ☒ No ☐
Legibly written name of the inspector? Yes ☒ No ☐
Number of Containers? Yes ☐ No ☒ * Violation
Condition of containers? Yes ☒ No ☐
Notes of observations made? Yes ☒ No ☐
Date and nature of repairs or corrective actions? Yes ☒ No ☐
7. Are ignitable and reactive wastes stored at least 50 feet from the
property boundary? (265.176) Yes ☒ No ☐
8. Are incompatible wastes stored in the same containers? Yes ☐ No ☒
9. Are containers holding incompatible wastes kept apart
by physical barrier or sufficient distance? (265.35) Yes ☒ No ☐
10. Is there sufficient aisle space allow to allow full inspection
of the containers and labels? (62-730.160(7) F.A.C.) Yes ☒ No ☐

Facility: _____
Date: 8-6-08

TRANSPORTERS CHECKLIST

1. Site Name: Univar USA, Inc.

Transporter Requirements (40 CFR 263)

1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500) Y X N _____
2. Does transporter have an EPA identification number? (263.11(a)) Y X N _____
3. Does the transporter use manifest system as required by 263.20? Y X N _____

Do the manifests contain at least:

- a. Name, address, and EPA ID of transporter? Y X N _____
- b. Name, address, and EPA ID code of generator? Y _____ N _____
- c. Name, address, identification code of designated permitted facility? Y _____ N _____
- d. Corresponding manifest document number? Y _____ N _____
- e. Description and quantity of each hazardous waste? Y _____ N _____
- f. Signature of subsequent transporters? Y _____ N _____
- g. Signatures signifying proper delivery or reasons why delivery could not be certified? Y _____ N _____
- h. EPA waste codes? Y X N _____
4. International shipments: (263.20(g)) NA X
- a. Record of date waste left U.S.? Y _____ N _____
- b. Presence of one signed copy in records? Y _____ N _____
- c. Signed copy of manifest returned to the generator? Y _____ N _____
- d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States? Y _____ N _____
5. For SQG waste:
- a. Is waste transported according to reclamation agreement? Y _____ N _____ N/A
- b. Is following information recorded on a shipping paper:

Facility: _____
Date: _____

Name, address, and EPA ID of waste generator

Y ____ N ____

Quantity of waste accepted

Y ____ N ____

DOT - required shipping info

Y ____ N ____

Date waste is accepted

Y ____ N ____

c. Does transporter carry this shipping paper during transport?

Y ____ N ____

d. Are records maintained for three years after termination or expiration of reclamation agreement?

Y ____ N ____

6. Are copies of the manifest retained for 3 years? (263.22)

Y X N ____

7. Is there evidence of discharge of hazardous waste? (263.30)

Y ____ N X

8. Has transporter demonstrated the financial responsibility required under 62-730.170(2)

Y X N ____

9. Does the transporter verify financial responsibility with the Department annually (62-730.170(3))?

Y X N ____

Transfer Facility Requirements (62-730.171)

1. Does transporter comply with 10 day storage limit for transfer facilities? (263.12) Y ____ N ____

N/A

a. Is the hazardous waste packaged according to 262.30? (263.12)

Y ____ N ____

2. General Facility Standards (265 Subpart B)

a. Security (265.14)

(1) Is the facility security system adequate to minimize unauthorized entry?

Y ____ N ____

(2) Are signs posted and legible for 25 feet?

Y ____ N ____

b. Inspection Requirement (265.15)

(1) Does the facility have a copy of the Inspection Plan?

Y ____ N ____

(2) Does the facility have completed inspection logs?

Y ____ N ____

(3) Were the deficiencies corrected in a timely manner?

Y ____ N ____

(4) Are the inspection logs maintained at the facility for 3 years?

Y ____ N ____

c. Personnel Training (265.16)

(1) Do management personnel complete hazardous waste training?

Y ____ N ____

Facility: _____
Date: _____

Is training on the job?
Is training in the classroom?

Y____N____
Y____N____

N/A

(2) Do laborers who handle hazardous waste complete training?

Y____N____

Is training on the job?
Is training in the classroom?

Y____N____
Y____N____

(3) Does training include:

Emergency response procedures?
Inspection procedures?
Operation of hazardous waste handling equipment?

Y____N____
Y____N____
Y____N____

(4) How often is training reviewed? _____

(5) Does the facility have personnel training records including:

Job title and description of position?
Description of employee's training

Y____N____
Y____N____

(6) Is training successfully completed within 6 months of hiring/
transfer to HW position?

Y____N____

(7) Are records maintained for three years at the facility?

Y____N____

d. Ignitable, Reactive, or Incompatible Waste (265.17)

(1) Is the waste separated and confined from sources of ignition or
reaction, sparks, spontaneous ignition, and radiant heat?

Y____N____

(2) Are "No Smoking" signs posted in the area?

Y____N____

3. Preparedness and Prevention (265 Subpart C)

a. Is there evidence of fire, explosion or contamination of the
environment? (265.31 Maintenance and Operation of Facility)

Y____N____

If yes, use narrative explanation.

b. Is the facility equipped with (265.32 - required equipment):

(1) Internal communications or alarm system?
Is it easily accessible in case of emergency?

Y____N____
Y____N____

(2) Telephone or two-way radio to call emergency response
personnel?

Y____N____

(3) Portable fire extinguishers, fire control equipment, spill control
equipment and decontamination equipment?

Y____N____

Is this equipment tested to assure its proper operation?

Y____N____

Facility: _____
Date: _____

How frequently? _____

N/A

(4) Water of adequate volume for hoses, sprinklers or water spray system?

Y _____ N _____

(a) Describe source of water. _____

(b) Indicate flow rate and/or pressure and storage capacity, if applicable. _____



c. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space)

Y _____ N _____

d. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with Local Authorities)

Y _____ N _____ NA _____

If NA, explain _____

e. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities)

Y _____ N _____ NA _____

If yes, indicate primary authority, _____
Is the fire department a city or volunteer fire department? _____

f. Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities)

Y _____ N _____

Are they readily available to the emergency coordinator?

Y _____ N _____

g. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities)

Y _____ N _____

If no, has the owner/operator attempted to do this?

Y _____ N _____

h. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37 - Arrangements with Local Authorities)

Y _____ N _____

4. Contingency Plan and Emergency Procedures (265 Subpart D)

a. Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)

Y _____ N _____

Facility: _____
Date: _____

b. Is it maintained at the facility? (265.53 - Copies of Contingency Plan) Y _____ N _____

c. Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan) Y _____ N _____

(1) Does the plan include:

(a) Action personnel will take? Y _____ N _____

(b) Evacuation routes? Y _____ N _____

(c) Emergency Equipment? Y _____ N _____

(d) Is the emergency equipment properly inspected and maintained? Y _____ N _____

d. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator) Y _____ N _____

e. Who is the emergency coordinator? _____

f. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53(b) - Content of Contingency Plan) Y _____ N _____

g. Has the facility supplied DEP with a copy of the Contingency Plan? (62-730.171(2)(a)) Y _____ N _____

5. Container Storage Checklist (Subpart I - Use and Management of Containers 265.170)

a. Are the containers in good condition (265.171)? (check for leaks, corrosion, bulges, etc.) Y X N _____

b. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Y _____ N X

c. Is the waste compatible with the containers and/or its liner? (265.172) Y X N _____

d. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173) Y _____ N X

If yes, explain using narrative.

e. Are each of the containers inspected at least weekly (265.174)? Y X N _____

If no, explain using narrative concerning the frequency of inspection.

f. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176) Y X N _____

If yes, explain using narrative.

g. Are incompatible wastes stored in the same containers? Y _____ N X

Facility: _____
Date: _____

If yes, explain using narrative.

h. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?

Y X N _____

If no, explain using narrative.

6. Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112(c), 265.114, 265.115? (62-730.171(2)(b))

Y _____ N _____

Has the facility supplied DEP with a copy of the plan?

Y _____ N _____

7. Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground? (62-730.171(2)(d))

Y _____ N _____

8. Is a written log maintained for all waste entering or leaving the transfer facility? (62-730.171(2)(e))

Y _____ N _____

Does the log contain:

Generators' names?

Y _____ N _____

Manifest numbers?

Y _____ N _____

Dates when waste enters and leaves facility?

Y _____ N _____

9. Has the facility notified the department on Form 62-730.900(6) (Transfer facility notification form)? (62-730.171(3))

Y _____ N _____

10. Does the transfer facility have an EPA/DER ID number?

Y _____ N _____

Unregulated Wastes
(Household/Conditionally Exempt/Small Quantity Generator Wastes)
NA X

1. Does the transporter have documentation that this waste was generated by an unregulated source?

Y _____ N _____

2. If no, is the transporter assuming responsibility as the generator of this waste?

Y _____ N _____

a. If yes, complete the applicable Generator or Small Quantity Generator checklist.

b. If no, the inspector should inform the transporter that he will be held responsible as the generator of the waste and will be reinspected to ensure that the applicable requirements are being satisfied. A follow-up inspection should be scheduled as follows:

(1) 90 days after initial inspection if the quantity of "unregulated"

Facility: _____
Date: _____

wastes on site exceed 1000 kg.

(2) 180 days after initial inspection if the quantity of "unregulated" wastes on site are less than 1000 kg.

3. Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)?

Y _____ N X

If yes, complete the Generator checklist.

Land Disposal Restrictions

1. Does the transporter manage restricted (land ban) wastes?

Y _____ N X

If yes, check appropriate box(es).

"California List"
F--- List Solvents
First Third
Second Third
Third Third
Soil and Debris

