

Department of Environmental Protection

Jeb Bush Governor Northeast District 7825 Baymeadows Way, Suite B200 Jacksonville, Florida 32256-7590

Colleen M. Castille Secretary

September 21, 2005

Mr. Kevin Hamilton Safety-Kleen Corporation 161 Industrial Loop South Orange Park, Florida 32073

Re:

Safety-Kleen Corporation

DEP/EPA ID# FLD 980 847 214 Clay County - Hazardous Waste

Dear Mr. Hamilton:

Thank you for your assistance during the hazardous waste RCRA Compliance Evaluation Inspection conducted by the Department at your facility on June 27 and July 13, 2005. Enclosed is the report that documents this inspection.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.807.3380.

Sincerely,

Pamela Fellabaum

Environmental Specialist

Hazardous Waste Section

PJF:db 60

Enclosures



Department of Environmental Protection

Jeb Bush Governor Northeast District 7825 Baymeadows Way, Suite B200 Jacksonville, Florida 32256-7590

Colleen M. Castille Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: \boxtimes	Routine Complaint Follow-u	p Permitting
FACILITY NAME: Safe	ty-Kleen Corporation DEP/EP.	A ID #: FLD 980 847 214
STREET ADDRESS: 16	1 Industrial Loop South, Orange Pa	ark, Florida 32073
MAILING ADDRESS: s	same as above	
COUNTY: Clay	PHONE: (904) 264-2607 DAT	E: 6/27/05 and 7/13/05
HW Facility Status	Used Oil Facility Status	Hg Facility Status
 Non-handler CESQG SQG LQG Transporter Transfer facility TSD SQH LQH 	Generator Transporter Transfer facility Marketer Processor On-spec. burner Off-spec. burner Filter generator Filter transporter Filter transfer facility	Exempt Generator Transporter Hg recovery facility Hg reclamation facility PCW facility status Producer Transporter
☐ LQn	Filter processor	Recovery facility
2. APPLICABLE REGULA ☐ 40 CFR 261.5 ☐ 40 CFR 265 ☐ 40 CFR 273	TIONS: 3 40 CFR 262	268
3. RESPONSIBLE OFFICIA	AL: Mr. Kevin Hamilton, Branch	Manager
4. INSPECTION PARTICI	PANTS: Kevin Hamilton and And	ly Gaulger, Safety-Kleen
	Pamela Fellabaum, Hann	ah Crawford and Brandon
·	Bottomley, FDEP	
5. LATITUDE/LONGITUDI	E: 30°10'46" / 81°43'8"	
6. TYPE OF OWNERSHIP:	private federal state c	ounty municipal
7 PÉDMIT #• 77120 UO 00	04 ISSUE DATE: 12/20/02 EV	D DATE: 12/20/2000

PROCESS DESCRIPTION:

Safety-Kleen Corporation (Safety-Kleen) is a hazardous waste management facility. The Florida Department of Environmental Protection issued permit number 77130-HO-004 to Safety-Kleen on December 30, 2003. The permitted hazardous waste units include two container storage areas (the main container storage area and the paint waste shelter) and an aboveground storage tank. The facility is also a transporter/transfer facility and a large quantity generator of hazardous waste. This inspection was unannounced.

SITE INSPECTION:

10-day Transfer Area

In the main building is the 10-day transfer area for waste storage. All containers of hazardous waste in this area were closed, labeled and dated. None of the containers had exceeded the 10-day transfer area for waste storage. The transfer facility operating logs were reviewed and found to be in order.

Spent Fluorescent Lamps Storage Area

Adjacent to the 10-day transfer area for waste storage is the storage area for spent fluorescent lamps. The spent fluorescent lamps are sent to AERC, Inc. in West Melbourne for recycling. At the time of the inspection, there were no containers of spent fluorescent lamps awaiting disposal. The storage area for spent lamps was labeled pursuant to Chapter 62-737, Florida Administrative Code (FAC).

Main Container Storage Area

The main container storage area is a permitted hazardous waste container storage area. There were approximately 20 containers of hazardous waste in the container storage area. All containers of hazardous waste in this area were closed, labeled and dated. The storage area has a trench located at both entryways. The trenches are checked daily and cleaned immediately should a spill occur. There was a small spill of waste from one of the containers, but it was immediately addressed by the facility at the time of the inspection. The containment for the container storage area also consists of 4" x 6" concrete curbing.

Based on the information reviewed during the inspection, unpermitted waste was not being stored in this container storage area.

Barrel Washing Area

Safety-Kleen distributes and services parts washers. Mineral spirits is used as a parts washer solvent. When the mineral spirits is spent, it is picked up by Safety-Kleen and replaced with new

product. The drums of waste mineral spirits are transported from the customer back to Safety-Kleen and deposited into an automatic barrel washer. Safety-Kleen operates one barrel washing unit. Solids from this waste stream are accumulated in the barrel washer while the liquid D001/D018/D039/D040 spent mineral spirits is pumped into a 15,000-gallon aboveground storage tank. Dumpster mud (mineral spirits sludge or barrel washer sludge) is placed into a 55-gallon drum located adjacent to the barrel washer. There were two drums of the dumpster mud. Both drums were closed, labeled and dated. The facility generates approximately four drums of D001/D039/D040 dumpster mud per week from the barrel cleaning operation.

Safety-Kleen distributes and services a smaller parts washer used for cleaning brake parts. The containers of D039 spent cleaning solution are transported back to Safety-Kleen and deposited into an automatic washer. The waste collected by the washer is poured into the barrel washer.

Continued Use Program

Safety-Kleen has a "Continued Use Program" for its "qualified customers." The Department approved the Continued Use Program subject to Safety-Kleen meeting ten specific conditions that were outlined in an October 25, 1999 letter from Satish Kastury to Catherine A. McCord.

At the Safety-Kleen facility, a separate barrel has been constructed for the Continued Use Program. This barrel has the ability to hold 150-gallons of continued use solvent.

The DEP reminds Safety-Kleen that all ten conditions outlined in the letter dated October 25, 1999 from Satish Kastury, FDEP to Catherine A. McCord, Safety-Kleen, must be met to operate the "Continued Use Program" in the manner it was approved. Should there be deviation from any of the established conditions, point of generation of the solvent will be at the generators' facilities.

Tank Farm

The facility's tank farm is located outside, adjacent to the main building. The 15,000-gallon aboveground hazardous waste storage tank contains waste mineral spirits and aqueous brake washer fluid from the operation of the barrel washer. At the time of the inspection, the tank was properly labeled and the tank alarms were in working order. Two other 15,000-gallon aboveground storage tanks are located adjacent to the waste mineral spirits tank. One tank is used for product mineral spirits and the other is used for spent ethylene glycol antifreeze mixtures. The spent ethylene glycol is shipped off-site to Noble Oil (NCD 986 172 476) for recycling.

The valves and pipe connections are being inspected for Subpart CC requirements in accordance with the permit. Copies of inspection logs were available for review during the inspection.

Paint Waste Shelter

The paint waste shelter is a permitted hazardous waste storage area. This building is located behind the main building. There were no drums of hazardous waste accumulating in this area at the time of the inspection.

Branch Wastes

Liquid Branch Contaminated Debris

Safety-Kleen uses a 55-gallon 90-day hazardous waste accumulation point adjacent to the barrel washer to accumulate waste contaminated debris, including dumpster mud, contaminated gloves and absorbents. The drum is kept closed and labeled as F002/F003/F005/D001/D004/D005/D006/D007/D008/D009/D010/D011/D018/D019/D021/D022/D023/D024/D025/D026/D027/D028/D029/D030/D032/D033/D034/D035/D036/D037/D038/D039/D040/D041/D042/D043 branch contaminated debris-liquid.

Solid Branch Contaminated Debris

Safety Kleen generates contaminated personal protection equipment, sample jars, rocks and metal during sampling of customer waste and shop clean up. The waste is identified as F002/F003/F005/D001/D004/D005/D006/D007/D008/D009/D010/D011/D018/D019/D021/D022/D023/D024/D025/D026/D027/D028/D029/D030/D032/D033/D034/D035/D036/D037/D038/D039/D040/D041/D042/D043 branch contaminated debris solid. It is accumulated in a 55-gallon 90-day hazardous waste accumulation point adjacent to the barrel washer.

Other Wastes

Safety-Kleen has two trucks dedicated to collect used oil and waste antifreeze from its customers for recycling. The used oil is sent to Industrial Water Services for recycling. The antifreeze is collected at Safety-Kleen and then sent to the Noble Oil (NCD 986 172 476) for recycling.

Used Oil is Chlordetect tested at least one time a year for every customer. Prior to the used oil being accepted by Safety-Kleen, it is always sniffed with a halogen detector. Facilities in the industrial sector have a Chlordetect test performed on all of their shipments of used oil.

Safety-Kleen has three vacuum service truck dedicated to collect oily wastewater from its customers. The oily wastewater is off-loaded at Industrial Water Services (IWS).

Used oil filters are accepted at Safety-Kleen. The filters are stored in totes and shipped to Oil Filter Recyclers, Inc. in Astoria, Illinois for disposal.

Any rags generated during routine activities at the facility are sent to Cintas for laundering.

RECORDS REVIEW:

A review of the facility's operating records required pursuant to the permit found them to be in order.

Safety-Kleen is currently a Large Quantity Generator of hazardous waste. The facility generates dumpster mud, liquid branch contaminated debris and solid branch contaminated debris. In addition, waste accepted into the permitted storage areas is remanifested with Safety-Kleen as the generator. Numerous manifests were examined during the generator record review of the inspection. The manifests, accompanying Land Disposal Restriction (LDR) forms and shipping papers examined were found to be in order.

Brum 9-21-05

Site Inspector:

Pamela Fellabaum

Environmental Specialist Hazardous Waste Section

Approved by:

Vicky G. Valade

Environmental Manager Hazardous Waste Section Approved by:

Ashwin B. Patel

Hazardous Waste Supervisor Hazardous Waste Section



Annual Recharacterization Procedure

ATTACHMENT B - National 2005 Annual Recharacterization Waste Codes EXCLUDING MN and UT

WASTE STREAMS			WASTE CODE CHANGES – NATIONAL				
		2004 Federal Waste Codes (Fr 2003 Data)		Changes from 2004 to 2005			
839	Aqueous Brake Clea	ner D039	D039	No Change	839		
16001 (SOLID AND LIQ MIX), 16002 (S), 16003 (L) Branch Contai Debris		F002 F003, F005, D001, D00 D005, D206, D007, D008, D00 D010, D011, D018, D00 D022, D023, D024, D025, D00 D027, D028, D029, D030, D00 D033, D034, D035, D036, D03 D038, D039, D040, D041, D04 D043	29. D005, D008, D007, D008, D0 21. D010, D011, D018, D019, D1 5. D022, D023, D024, D025, D0 22. D027, D028, D029, D030, D0 27. D033, D034, D035, D036, D0	009. 121. 126. 132. 137.	16001 (SOLID AND LIC MIX), 16002 (S), 16003 (L)		
456	Immersion Cleaner (I 699)	C D006, D008, D018, D02 D038, D039, D040	7. D006, D008, D018, D0 D039, D040	Delete D038	950		
704 801(RQ)	Parts Washer Solven 105 Recycled	DD01, D018, D039, D04	0 D001, D018, D039, D0	40 No Change	704 801(RQ)		
11657 (Bulk)	Parts-Washer Schools (Bulker Combination of 105 and 150 (Aqueous, where applicable	D001, D018, D039, D04	D001, D018, D039, D04	10 No Change	11657 (Bulk)		
16656	Parts Washer Solvent Sludge/Dumpster Muc	I INNER CHIRD LYMN	D001, D039, D040	No Change	15002		
16000	Parts Washer Solvent Tank Bolloms (bulk)**	0018, 0039, 0040	D039, D040	Delete D018	15001		
786	Parts Washer Solvent 150	D039, D040	Dố39	Delete D040	717		
786	PRF and PDF Mil Spec Solvent	D039, D040	D039	Delete D040	717		
2850, 12851(RQ - high cap)	Paint Gun Cleaner (SK)	F005, F003, D001, D018, D035, D036, D038, D039, D040		Delete D036	12800, 12801 (RQ - hi cap)		
	Clear Choice Paint Gun Cleaner	F003, D001, D018, D035, D036, D038, D039, D040	F003, D001, D018, D035 D038, D039, D040	NEW	12858		
674 (ANY) 12675(30) 12676(55)	Paint Waste Other ***	F005, F003, D001, D018, D035, D036, D038, D039, D040	F003, F005, D001, D018, D035, D038, D039, D040		12874 (ANY), 12875(30), 12876(55)		
12627	Dry Cleaner (Perc) Bottoms	F002, D007,D039, D040	F002, D007, D039, D040	No Change	12627		
13906	Dry Cleaner (Perc) Filters	F002, D007, D039, D040	F002, D007, D039, D040	No Change	13906		
13631	Dry Cleaner (Perc) Separator Water	F002. D039. D040	F002, D039, D040	No Change	13631		
13569	Dry Cleaning Naphtha Bottoms	D001, D039, D040	D007, D039	Add D007, Delete D001 and D040	15569		
13969	Dry Cleaning Naphtha Filters	D001, D039, D040	D007, D039	Add D007, Delete D001 and D040	15969		
13669	Dry Cleaning Naphtha Separator Water	D001, D039, D040	D039	Delete D001, D040	15669		
16004	Aqueous Parts Washer Tank Bottoms	D039, D040	D039, D040	No Change	16004		
16005	Aqueous Parts Washer Dumpster Sludge	D039, D040	D039, D040	No Change	16005		
washer solvent tank hi	offere are SK-conoraled u	vactor from the classout of c	about alexander to Defe	1151			

^{**} Parts washer solvent tank bottoms are SK-generated wastes from the cleanout of solvent storage tanks. Safety-Kleen does not accept this waste stream from non-SK generators.

^{***} SKDOT 12874 is acceptable to use for any size container of paint waste. For those states that require 30-gal paint waste to be listed separately, use SK DOT 12875; for states that require 55-gal paint waste to be listed separately, use SK DOT 12876.

USED OIL TRANSPORTER CHECKLIST

	acility Name: So fety Kleen acility Representative: Kevin Hamilton		6/27/05)#: FLD			
	spector: Poin Fellabeum	Registrat		150 /	31. 01	.3
		r vogioti Qt				
	40 CFR 279 Subpart E Transp	oorter Sta	ndards			
1.	is the facility exempt under any of the following? (279.40(a))			Y	N_ /	
	On site transport?					•
	Generator transporting < 55 g /time to a collection center?					
	Transporter of < 55 g /time from generator to aggregation po by same generator?	int owned			•	•
2.	If the transporter also transports hazardous waste in the same are used to transport used oil, are the vehicles emptied per 2 HW shipments? (If not, the used oil must be managed as ha	61.7 after		Y	N	M
3.	Does the transporter process used oil incidental to transport?	(279.41)		Υ	N_ X	
	Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock?	;	N/A	Y	N	
	If not, has the transporter conducted a hazardous waste determination? (279.10(e))		N/A_ <u></u>	Y	N	
4.	Has the facility notified of used oil activities? Check EPA form 8700-12			Y_X_	N	
5.	Does the transporter only deliver used oil to other transporters oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? (279.43(a))	S,	٠	<u>γ</u> ×	N	
6.	Does the transporter comply with DOT requirements? (279.43	8(b))		$^{\rm A}\overline{^{\star}}$	N	
7.	If any oil is discharged during transport, does the transporter:	(279.43(c))				will
	Notify National Response Center and State Warning Point and Guard per 33 CFR 153.203, as applicable?	d Coast		Y	N	Wil
	Report to DOT in writing per 49 CFR 171.16?			Y	N	
	Clean up any discharges until the discharge poses no threat?			Υ	N	
8.	Does the facility also transport used oil filters?			Y	N	
	If so, are the filters stored in above ground containers which a	re: (62-710	.850(6))			
	In good condition?			Y_X_	N	
	Closed or otherwise protected from weather?			Y	N	•
	Labeled "Used Oil Filters"?			Y	N	
	Stored on an oil impervious surface?			YY	N	

DRAFT Rev. 9-28-95

Facility:_	 	
Date:		

Transporter Recordkeeping - 279.46

1.	Do used oil acceptance records include: (279.46(a))	
	Name & Address of facility providing the oil for transport?	Y_X_ N
	EPA ID # of oil provider (if applicable)?	Y_X_N
	Quantity of oil shipped?	Y <u>. X</u> N
	Date of shipment?	. Y <u></u> N
	Signature of oil provider, dated upon receipt?	Y_X N
2.	Do used oil delivery records include: (279.46(b))	
	Name & Address of receiving facility or transporter?	Y_X N
	EPA ID # of receiving facility or transporter?	Y_X N
	Quantity of oil delivere?	Y_X N
	Date of delivery?	Y_X N
	Signature of oil receiver, dated upon receipt?	Y_ X N
3.	Do the above records also include state required information on the type of oil and destination or end use? (62-710.510(1)(c & e))	YXN
4.	Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))	Y_ * N
5.	Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)	Y N
	If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?	Y NY
7.	Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))	Y_X_ N
	Transporter Certification (62-710 F.A.C.)	
1.	Is the transporter certified? (local governments, and < 55g/time transporters are exempt) (62-710.600)	Y_X N
2.	Does the facility maintain training records? (62-710.600(2)(c))	Y_X N
3.	Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.600(2)(d))	Y_ X_ N
A	is the facility registration form and ID number displayed? (62-710.500)	Y <u></u> * N

	Date:		
	Transfer Facility Standards - 279.45	·	
1	Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F	Y	N_X
	Is the transfer facility registered per 62-710.500(1)(a) F. A. C.?	Y	N \
2.	Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm?	Y	N
	Is this done by testing?	Y	N
	Is this done by process knowledge? Describe basis in narrative.	Y	N
	Are test records or copies of records providing basis for determination kept for 3 years?	Y	N M
3.	Have any analyses showed exceedances of the 1,000 ppm level?	Y	N
	If so, was the oil managed as hazardous waste?	Y	N
	If not, was the oil exempt? Describe in narrative. N/A	Y	N \(\sqrt{1} \)
4.	Is used oil stored only in tanks o containers? (Circle applicable units)	Y <u>X</u>	N
5.	If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)	Y	N
	Is secondary containment provided and adequate?	teo Y	N \
6.	Are containers, and tank trailers in good condition and not leaking?	Λ <u></u> λ	N
7.	Are containers provided with secondary containment consisting of walls and floor at a minimum?	Λ <u>.</u> λ	N
	Is the containment system impervious to oil so as to prevent migration?	Y <u>×</u>	N
8.	Are ASTs, UST tank fill lines and containers labeled "used oil?	Y	N
0	Are used all filters stored more than 10 days?	4 X	

Facility:

If so, is the facility a registered used oil filter transfer facility? (62-710.850) N/A

10. Does the facility stop operations and clean up releases of used oil, repairing

or replacing any leaking units as applicable?

GENERATOR CHECKLIST

Facility Name: Safety Kleen Date: 6/20/254 7/13/25 Facility Representative: Kevin Hamilton Facility ID #: FUD 980 847 214 SIC Codes: Inspector: Parm Fella bacum						
40 CFR 262 Subpart A General Standards						
Describe the facility	ys nazardous	waste strea				
WASTE DESCRIPTION	EPA Waste Codes	Generation Rate	Disposal Facili and EPA ID	ty	Correct ID?	Testing or Process Knowledge
Pw solvent	Tsee J		6K Lexington			
Dumpster Mud	Mached list for		5K			
Dry Cleaning waste	eoclis		Herington Hebren Ohio focal	eby		
IC water		·	SK Lexington			
Fluntubes	A.		AERC			
Paint wasts			5K Illinois			
(describe discrepancies in waste identification in narrative)						
2. Has the facility obtained an EPA ID number? (40 CFR 262.12)						
3. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? Y_N						
4. Are any hazardous wastes treated or disposed of on site? Describe in narrative. YN						
5. Is the facility exempt from hazardous waste permit requirements? YN_ N_ N_ N_ N_ N_ N_ N_ N_						

Facility:	
Date:	

40 CFR 262 Subpart B -- The Manifest

1.	. Does the facility use a manifest for all its hazardous wastes? (262.20) Y N					
2.	Is the facility using the correct form (EPA 8700-22; OMB #2050-0039)?					
3.	Does the facility ship by rail or water? (If so, check 262.23(c))					
4.	. Is the manifest filled out properly?					
	Item No.:					
	-5 d 3Ge 4Ge 5-8Tra D-FTra 9TS 10TS 11DC and 12Co 13-14Qu IEP KHa 16Na 17-18Na 19Are 20Na	enerator phone an ansporter names ansporter phone D name and ma D # EPA ID # D Phone # (state of description of d packaging grountainer # and type antity of waste a A waste code (state and the code (state me, handwritten any manifest di me, handwritten	cument # nd mailing address # and ID #s # (state requirement) iling address e requirement) the waste, including haz be nd units tate requirement)	nd date and date ate Number of manifests e Number	Y	
Ма	nifest#	Date	Destination	Error(s)		
				<u> </u>		
٠	If so, did exce		een filed? (262.42) clude legible copy of mar ears?	nifest and cover letter?	Y N X Y N Y	pv4

Facility:	 	
Date:	 	

40 CFR 262 Subpart C -- Pre Transport Requirements

1.	Does the facility accumulate the waste on-site prior to treatment or disposal?	Y_	Х	_N	
	Circle applicable accumulation units: Containers Canks Drip Pads Containment Buildings				
2.	Are containers used to ship the waste off-site?	Y_	×	_N	
3.	Are any containers on-site prepared for shipment? a. If so, are the containers appropriate for the waste? (262.30)	Y_ Y_	* *	_N _N	
	b. Are the correct diamond-shaped DOT hazard class container labels used? (262.31)	Y_	*	_N	
	c. Are containers of 110 g or less marked with the correct DOT shipping name and number? Is a label with the language required under 262.32(b) used?	Y_ Y_	× ×	_N _N	
	Is the generator's name, address and manifest document number on the label?	Y	×	_N	
	d. Are placards available to be provided to the transporter? (262.33)			_N	
	e. Are bulk packagings used (over 400 kg solid or 118 g liquid)?	Y_	<u>×</u>	_N	
	f. Are they marked and placarded properly?	Y_	<u>×</u>	_N	
	40 CFR 262 Subpart C Accumulation Requireme	nts			
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_	×	N	
2.	If not, has the facility been issued an extension by the Department? (262.34(b))	Y_		_N	لمام
3.	Is each container marked with the beginning date of accumulation? (262.34(a)(2))	Υ_	<u>×</u>	_N	
4.	Is each container and tank marked with the words "Hazardous Waste"? (262.34(a)(3))	Y	×	_N	
5.	Are satellite accumulation points used? Describe in narrative.	Y_		_NX	
6.	Are satellite containers closed ((262.34(c)) and marked with the words "hazardous waste" or other words that describe the contents?	Y		_N	M
7.	Do satellite accumulation points hold 55 gallons of waste or less?	Y_		_N	
В.	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	\bigvee

Facility:	
Date:	

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?	YX_N
5.	Does the training cover hazardous waste identification and handling procedures?	Y_X_N
6.	Does the facility maintain personnel training records?	YX_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?	YX_N
9.	Do the job descriptions include a list of the positions' duties?	YX_N
10.	Are people trained within 6 months of hiring?	YN
11.	Do they work unsupervised prior to training?	YNX_
12.	Is training reviewed annually? Date of last training	Y_X_N
13.	Are records maintained for three years?	Y_ X_N
	265 Subpart C Preparedness and Prevention	า
1.	Is there evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? (265.31)	YNX
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 <u> </u>
4.	Describe fire control equipment. Is it adequate? (265.32(c))	Y_
5.	Is spill control and decontamination equipment present? (265.32(c))	Y_X_N

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 <u> ×</u> N
7.	Is the emergency equipment inspected and tested periodically? Frequency?	Y <u> </u>
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: Police: Hospital: Emergency Response Contractor:	Y X N Y X N Y X N Y X N
10.	If not, has the facility attempted to do so and is the refusal documented?	YN VA
	265 Subpart C Contingency Plans and Emergency R	esponse
1.	Does the facility have a contingency plan? 265.51)	YX_N
2.	Is it at the facility and easily available? (265.53)	YN
3.	Does the plan include: Fire Response Procedure: Spill Response Procedures: Explosion Response Procedures: A description of arrangements with local authorities: Emergency Coordinators: (Name) Keun Hamilton	Y
	Addresses and telephone numbers of Emergency Coordinators: Emergency equipment list: Specifications and capabilities of emergency equipment: Locations of emergency equipment: An evacuation plan and routes: Evacuation/alarm signals:	Y X N Y X N Y X N Y X N Y X N Y X N Y X N
4.	Addresses and telephone numbers of Emergency Coordinators: Emergency equipment list: Specifications and capabilities of emergency equipment: Locations of emergency equipment: An evacuation plan and routes:	Y
4. 5.	Addresses and telephone numbers of Emergency Coordinators: Emergency equipment list: Specifications and capabilities of emergency equipment: Locations of emergency equipment: An evacuation plan and routes: Evacuation/alarm signals: Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan	Y X N Y X N Y X N Y X N Y X N Y X N

Facility:____
Date:____

Facility:	
Date:	

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 N/A	Y X X Y Y X	NNN
2.	Where are records kept? CT Facility	<u>I·</u>		
3.	Who is in charge of keeping records? Name Kesin Title Branch Manager	tani	110m	
4.	Any additional reporting, such as contingency plan implementation reports? (262.43)	on NA	YX	_N
5.	Are records kept for a minimum of 3 years?		Y_X	N
	40 CFR 262 Subpart E Exports	N/A	<u>×</u>	
1.	Has the facility exported any hazardous waste?		Y	N
2.	Has the exporter notified EPA 60 days prior to the initial shipmen	t?	Y	N
3.	Has the receiving country consented to receive the waste?		Y	_N
.4.	Has a copy of the EPA Acknowledgment of Consent accompanie the shipment?	ed	Y	_N
5.	Did the shipment conform, and was the manifest completed as reby 40 CFR 262.54?	equired	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	<u> </u>	
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.)	YesX_No
2.	If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?	Yes <u>×</u> No
3.	Is the waste compatible with the containers and/or its liner (265.172)?	Yes <u>X</u> 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 _X_ No
	Are records kept including: (62-730.160 (6) F.A.C.) Date? Time? Legibly written name of the inspector? Number of Containers? Condition of containers? Notes of observations made? Date and nature of repairs or corrective actions?	Yes X No Yes
7.	Are ignitable and reactive wastes stored at least 50 feet from the property boundary? (265.176)	Yes X 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 <u>X</u> 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:_	<u>Sal</u>	utu	b5 4	ee/)		
Date:	4/	21	054	7	13	05	
	•			- 1	•		

TRANSPORTERS CHECKLIST

	L. :	Site Name: 5K - OP face lifty	
		-	
		Transporter Requirements (40 CFR 26	3)
]	.]	Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500)	Y_ X_N
2	. I	Does transporter have an EPA identification number? (263.11(a))	YX_N
. 3	. İ	Does the transporter use manifest system as required by 263.20?	Y X N
	I	Do the manifests contain at least:	
	a	a. Name, address, and EPA ID of transporter?	Y_X_NY
	b	o. Name, address, and EPA ID code of generator?	YN
	c. fa	Name, address, identification code of designated permitted acility?	YN
	d.	l. Corresponding manifest document number?	YN
	e.	Description and quantity of each hazardous waste?	YN
	f.	Signature of subsequent transporters?	YN
	g. co	. Signatures signifying proper delivery or reasons why delivery ould not be certified?	YN
	h.	. EPA waste codes?	YY
4.	In	nternational shipments: (263,20(g))	NA_X
	a.	Record of date waste left U.S.?	YN
	b.	Presence of one signed copy in records?	YN
	c.	Signed copy of manifest returned to the generator?	YN
	d. of	Copy of the manifest given to a U.S. Customs official at the point departure from the United States?	Y N
i .	For	or SQG waste:	
	a.	Is waste transported according to reclamation agreement?	Y X N.
	b.	Is following information recorded on a shipping paper:	e de la companya de

			Facility:	
		· · · · · · · · · · · · · · · · · · ·	Date:	Y X N
		Name, address, and EPA ID of waste generator		
		Quantity of waste accepted		. Y N
		DOT - required shipping info		YX_N
		Date waste is accepted		X_X_N
	c.	Does transporter carry this shipping paper during transport?		Y_X_N
	d. exp	Are records maintained for three years after termination or biration of reclamation agreement?		Y_X_N
5.	Ar	e copies of the manifest retained for 3 years? (263.22)	· .	Y_X_N
١.	Is t	there evidence of discharge of hazardous waste? (263.30)	,	YN_X_
3.	Ha un	s transporter demonstrated the financial responsibility required der 62-730.170(2)		Y_X_N
9.	Do	es the transporter verify financial responsibility with the Depar nually (62-730.170(3))?	tment	Y_X_N
	,	Transfer Facility Requirements	(62-730.171)	en de la companya de
l.	Do (20	oes transporter comply with 10 day storage limit for transfer fac 63.12) Y_X_N	cilities?	(y) 3 x
	a	Is the hazardous waste packaged according to 262.30? (263.	12)	Y_X_N
2.	Ge	eneral Facility Standards (265 Subpart B)	·	•
	a.	Security (265.14)		
		(1) Is the facility security system adequate to minimize unau entry?	thorized	Y_X_N
		(2) Are signs posted and legible for 25 feet?		Y_X_N
	ъ.	Inspection Requirement (265.15)		•
		(1) Does the facility have a copy of the Inspection Plan?		Y_X_N
		(2) Does the facility have completed inspection logs?		Y_X_N
		(3) Were the deficiencies corrected in a timely manner?		Y X N
		(4) Are the inspection logs maintained at the facility for 3 years	ears?	A _ X _ N
	C.	Personnel Training (265.16)	:	
•		(1) Do management personnel complete hazardous waste tr	aining?	Y_X_NY

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•		Facility: Date:	
		Is training on the job? Is training in the classroom?	Y * N
		(2) Do laborers who handle hazardous waste complete training?	YN
		Is training on the job? Is training in the classroom?	A X N
		(3) Does training include:	
		Emergency response procedures? Inspection procedures? Operation of hazardous waste handling equipment?	Y × N Y Y N Y Y N Y Y N Y Y Y N Y Y Y Y
		(4) How often is training reviewed? Annually 4 as New	led March 2005
		(5) Does the facility have personnel training records including:	
٠		Job title and description of position? Description of employee's training	A × N
		(6) Is training successfully completed within 6 months of hiring/transfer to HW position?	Y_X_N
		(7) Are records maintained for three years at the facility?	Y_X_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_X_N
		(2) Are "No Smoking" signs posted in the area?	Y_X_N
3.	Pre	paredness and Prevention (265 Subpart C)	
	a. env	Is there evidence of fire, explosion or contamination of the vironment? (265.31 Maintenance and Operation of Facility)	YN_X_
•	If y	es, 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_X_N
		(2) Telephone or two-way radio to call emergency response personnel?	YX_N
		(3) Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?	Y_ X_N
		Is this equipment tested to assure its proper operation?	Y_X_N

Date:	
	a 1
How frequently? monthly annually asnee	ded
(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	
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)	у_ х _ у
Has the owner/operator made arrangements with the local authorities of 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_ ★ NNA
f NA, explain	· · · · · ·
e. In the case that more than one police or fire department might respond, s there a designated primary authority? (265.37 - Arrangements with Local Authorities)	ynnaX
f yes, indicate primary authority. Is the fire department a city or volunteer fire department?	
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) Are they readily available to the emergency coordinator?	Y_X_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 Authorites)	Y × N
If no, has the owner/operator attempted to do this?	YNWF
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_XN_ YN_ MA
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:

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	Facility: Date:	
b. Is it maintained at the facility? (265.53 - Copi	ies of Contingency Plan)	Y_X_N
c. Is the contingency plan a revised SPCC Plan of Contingency Plan)	(265.52 - Content	YN_X_
(1) Does the plan include:		and the state of t
(a) Action personnel will take?		Y_ X N
(b) Evacuation routes?		Y_ X_ N
(c) Emergency Equipment?		Y_X_N
(d) Is the emergency equipment properly maintained?	inspected and	Y_X_N
d. Is there an emergency coordinator on site or distance of the plant at all times? (265.55 - Emergency	within short driving gency Coordinator)	Y X N
e. Who is the emergency coordinator?	Kevin Hamilton	
f. Has the facility supplied local police and fire copy of the contingency plan? (265.53(b) - Conten	lepartments with a t of Contingency Plan)	Y_X_N
g. Has the facility supplied DEP with a copy of the (62-730.171(2)(a))	he Contingency Plan?	Y_X_N
Container Storage Checklist (Subpart I - Use and	Management of Containers 265.	<u>170)</u>
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 the hazardous waste from the leaking container?	operator transfer	Y_X_N
c. Is the waste compatible with the containers an (265.172)	d/or its liner?	Y_X_N
d. Are containers holding hazardous waste opened in such a manner as to cause the container to ruptu	ed, handled or stored are or leak? (265.173)	YN_X
If yes, explain using narrative.	en e	
e. Are each of the containers inspected at least w	eekly (265.174)?	YX_N
If no, explain using narrative concerning the frequ	ency of inspection.	
f. Are containers holding ignitable or reactive was 15 meters (50 feet) from the facility property line?	astes located at least (265,176)	Y_X_N
If yes, explain using narrative.		
g. Are incompatible wastes stored in the same co	ntainers?	YN_X_
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	Facility: Date:
·	
If yes, explain using narrative.	
h. Are containers holding incompatible wastes kept apart by pl barrier or sufficient distance?	hysical 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))	
Has the facility supplied DEP with a copy of the plan?	Y_X_N
7. Is hazardous waste that is stored in containers or vehicles stored a man made surface which is capable of preventing spills or releases the ground? (62-730.171(2)(d))	on to Y_X_N
8. Is a written log maintained for all waste entering or leaving the facility? (62-730.171(2)(e))	transfer Y_ × N
Does the log contain:	erina di Paramanana di Par Paramanana di Paramanana d
Generators' names? Manifest numbers? Dates when waste enters and leaves facility?	Y N Y N Y V 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?	$Y \rightarrow N$
Unregulated Wass (Household/Conditionally Exempt/Small Q NAX	tes Quantity Generator Wastes)
1. Does the transporter have documentation that this waste was generated by an unregulated source?	YN
2. If no, is the transporter assuming responsibility as the generator this waste?	of YN
 a. If yes, complete the applicable Generator or Small Quantity Generator checklist. 	
b. If no, the inspector should inform the transporter that he wi held responsible as the generator of the waste and will be reinsp to ensure that the applicable requirements are being satisfied. A inspection should be scheduled as follows:	ected
(1) 90 days after initial inspection if the quantity of "unreg	ulated"

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	Facility:	
	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.	—	
DC	OT shipping descriptions 263.10(c)(2)?	YN
	If yes, complete the Generator checklist.	
	•	
	Land Disposal Restrictions	•
l.	Does the transporter manage restricted (land ban) wastes?	Y_ × N
	If yes, check appropriate boxx(es).	
	"California List"	<u></u>
	F List Solvents	<u> </u>
	First Third	
	Second Third	.
	Third Third	
	Soil and Debris	