

Inspector

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 9, 1997

CERTIFIED MAIL - RETURN RECEIPT

Mr. Raymond Whittle, Facilities Manager
Perma-Fix of Florida, Inc.
1940 N.W. 67th Place
Gainesville, Florida 32653

Dear Mr. Whittle:

Perma-Fix of Florida, Inc.
Warning Letter No. WL97-0823HW01NED
High Priority Hazardous Waste Violations
DEP/EPA ID FLD 980 711 071
Alachua County - Hazardous Waste

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on March 28, 1997 indicates that violations of Florida Statutes and Rules may exist at your facility. Department of Environmental Protection personnel made observations described in the attached inspection report. The "Summary of Violations" section of the report lists the alleged violations of Department rules.

Section 403.727 Florida Statutes provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should be ceased.

You are requested to contact Pamela Fellabaum (904) 448-4320, at extension 380 within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Perma-Fix of Florida, Inc.
WL97-0823HW01NED
Page Two

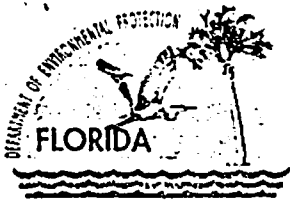
PLEASE BE ADVISED that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. If after further investigation, the Department's preliminary findings are verified, this matter may be resolved through the entry of Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the RCRA Civil Penalty Policy of 1990, the penalties which could be assessed in hazardous waste cases are up to \$25,000 per day per violation. If this matter cannot be resolved within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice Of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,

A handwritten signature in black ink, reading "Michael J. Fitzsimmons". The signature is fluid and cursive, with the first name "Michael" and last name "Fitzsimmons" clearly legible.

Michael J. Fitzsimmons
Waste Program Administrator

MJF/sd
Attachments



Department of Environmental Protection

Lawton Chiles
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7825 Baymeadows Way, Suite B200
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HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-arranged

FACILITY NAME: Perma-Fix of Florida, Inc. DEP/EPA ID #: FLD 980 711 071

STREET ADDRESS: 1940 NW 67th Place, Suite A, Gainesville, FL 32653

MAILING ADDRESS: same

COUNTY: Alachua PHONE: (352) 373-6066 DATE: 3/28/97 TIME: 09:30

HW facility status

- ☐ non-handler
- ☐ CESQG
- ☐ SQG
- ☒ LQG
- ☐ transporter
- ☐ transfer facility
- ☒ TSD
- ☐ SQH
- ☐ LQH

used oil facility status

- ☒ generator
- ☒ transporter
- ☒ transfer facility
- ☒ marketer
- ☐ processor
- ☐ on-spec. burner
- ☐ off-spec. burner
- ☐ filter generator
- ☒ filter transporter
- ☒ filter transfer facility
- ☐ filter processor

Hg facility status

- ☐ exempt
- ☐ generator
- ☒ transporter
- ☐ Hg recovery facility
- ☐ Hg reclamation facility

PCW facility status

- ☐ producer
- ☒ transporter
- ☐ recovery facility

2. APPLICABLE REGULATIONS:

- | | | | |
|--|--|---|---|
| <input type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input checked="" type="checkbox"/> 40 CFR 264 |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input checked="" type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input checked="" type="checkbox"/> 40 CFR 270 |
| <input checked="" type="checkbox"/> 40 CFR 273 | <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL: Mr. Raymond Whittle, Facilities Manager

4. INSPECTION PARTICIPANTS: Raymond Whittle, Perma-Fix
Pam Fellabaum, FDEP Steven Douglas, FDEP

5. LATITUDE/LONGITUDE: 29°42'08"/82°20'51"

6. TYPE OF OWNERSHIP: private federal state county municipal

7. PERMIT No.: HO 01-169480 DATE ISSUED: 9/28/90 EXP. DATE: 9/27/95

PROCESS DESCRIPTION

Perma-Fix of Florida, Inc., a subsidiary of Perma-Fix Environmental Services, is a permitted hazardous waste storage facility. The facility's processes include liquid and sludge bulking, scintillation vial and other small container crushing and shredding, solvent distillation, repackaging of solid wastes contaminated by hazardous wastes, stabilization of waste in containers, used oil handling, and consolidation and storage of discarded mercury-containing devices. The facility is currently accepting waste generated by CERCLA activities. The facility's hazardous waste storage facility storage permit (HO 01-169480) is currently under review for renewal by the Department. This inspection was unannounced.

Liquid Scintillation Fluid (LSF) Processing

Perma-Fix of Florida, Inc. is primarily a waste processing and liquid bulking operation for LSF. Scintillation fluids emit traceable amounts of radiation when exposed to a radioactive source. These fluids are generally used by research institutes as tracer fluids. The LSF contain small amounts of xylene and toluene and may be radioactive. The LSF is therefore regulated under the Resource Conservation and Recovery Act (RCRA) as F003/F005 hazardous waste, and, if radioactive, as a Mixed Waste under RCRA and Nuclear Regulatory Commission rules. Approximately ninety percent (90%) of the LSF arrives in vials, and the remaining ten percent (10%) arrives in bulk drums. Both types of drums contain cushioning packing material, usually vermiculite. The facility processes an average of 500 drums of vials of LSF per month.

After the paperwork corresponding to each drum has been checked, the drums are tagged and staged in the temporary holding area before processing. Drums are segregated by generator, and each generator's waste is processed separately. The drum lids are removed, the drums are lifted by an air hoist and the contents are emptied onto a shaker screen. The packing materials that fall into a catch basin are tested for radioactivity and transferred to a roll-off. The packing material is manifested to Perma-Fix (Memphis, Tennessee) as a F001 / F002 / F003 / F005 / D001 / D004 / D005 / D006 / D007 / D008 / D009 / D010 / D011 / D018 / D019 / D027 / D028 / D029 / D035 / D039 / D040 / D043 hazardous waste.

The glass and plastic vials that remain on top of the shaker table are conveyed to a crusher. The fluid in the vials is drained into a basin and transferred into one of two 80-gallon test tanks. The fluids are tested for radioactivity and, then, either pumped to a 3,000-gallon aboveground storage tank (AST) in the permitted storage (Part B) area, or are temporarily containerized to facilitate radioactive decay.

The crushed plastic/glass vials are triple washed in ethanol and water. The ethanol wash is changed after approximately 30 drums of LSF vials have been processed. The D001 waste ethanol is transferred directly to the 3,000-gallon AST in the Part B area. The waste glass/plastic is transported to Ogden-Martin Systems WTE (Ogden-Martin) in Okahumpka, Florida for disposal as a non-hazardous, solid waste.

Liquid wastes, including LSF and hazardous waste liquids, also arrive at the facility in bulk containers or tanker trucks. Liquid wastes that test negative radiologically and have waste codes D001/F003/F005 are either pumped to the 3,000 gallon tank or are bulked into 550-gallon totes pending future transfer into a tanker truck. Hazardous waste liquids that test positive radiologically are temporarily containerized to facilitate radiological decay. Liquid wastes that can be burned for energy recovery are manifested to Giant Cement Company (Harleyville, South Carolina) as F001 / F002 / F003 / F005 / D001 / D004 / D005 / D006 / D007 / D008 / D009 / D010 / D011 / D018 / D019 / D027 / D028 / D029 / D035 / D040 / D043 / U122 hazardous waste. All other liquid wastes, particularly hazardous wastes which contain a high percentage of water, are manifested to Michigan Recovery Systems, Inc. (Romulus, Michigan) as a F001 / F002 / F003 / F005 / D001 / D004 / D005 / D006 / D007 / D008 / D009 / D010 / D011 / D018 / D019 / D027 / D028 / D029 / D035 / D040 / D043 / U122 hazardous waste.

Permitted Storage (Part B) Area

The hazardous waste storage area consists of a covered, bermed concrete storage structure with secondary containment and sumps. At the time of the inspection, the facility appeared to be operating within its permitted storage capacity. The hazardous waste containers that were examined were properly closed and labeled, and had been dated with the storage start date. Adequate aisle space had been provided for the containers. Pallets are used for stacking drums a maximum of two high, with a maximum of four 55-gallon drums per pallet.

At the time of the inspection, nine 55-gallon drums, staged in the Part B Area, were found to have a significant amount of hazardous waste spilled on the side of the drum (Photos 1, 2). The drums (drum numbers 5, 6, 7, 9, 11, 12, 14, 15, 16 from packing group PF-411H) contained D001/F003/F005 waste paint/waste solvents and were generated by Perma-Fix. Failure to operate the facility in a manner which minimizes the possibility of the release of hazardous waste to the environment is a violation of 40 CFR 264.31. One drum (drum number AES 131-H (25)), containing D001/F003/F005 waste paint/waste solvent, was leaking from the bung (Photo 3). Failure to ensure that any container holding hazardous waste is closed, except when adding or removing waste, is a violation of 40 CFR 264.173(a). Subsequent to the inspection, the facility provided documentation (attached) indicating that the drums with overspill and the drum with the leaking bung were overpacked, and that additional training and inspections would be implemented by the facility.

The 3,000-gallon AST is located in the approximate center of the Part B area. The tank has 100% secondary containment and a sump to contain any spillage. The majority of the consolidation and fuel blending occurs in the east side of the permitted TSD building, adjacent to the 3,000-gallon AST. Hazardous wastes which arrive in drums are consolidated into the 3,000-gallon tank or transferred into 550-gallon totes for fuel blending. Containerized hazardous wastes which contain a high percentage of solids or sludge are blended with liquid hazardous wastes from the 3,000-gallon AST or a 550-gallon tote to form a pumpable mixture. The mixture is then transferred into 550-gallon totes and manifested to Giant Cement Company, as previously described. Hazardous wastes stored in the 3,000-gallon AST are pumped directly into tanker trucks and manifested to Giant Cement Company.

At the time of the inspection, there were three hazardous waste containers accumulating in the fuel blending section of the Part B area:

1. One 55-gallon drums containing D001/F003/F005 sludge and solids, dated 3/3/97
2. One 55-gallon drum containing D001/F003/F005 blending equipment run-off, dated 3/24/97
3. One 550-gallon tote containing D001/F003/F005 contaminated glass, dated 1/13/97

The three containers in the fuel blending area were properly closed and labeled.

Non-Hazardous Waste Storage Building

Perma-Fix of Florida, Inc. is currently registered as a used oil transporter, transfer facility, marketer, oil filter transporter, oil filter transfer facility, oil filter processor and mercury-containing lamps storage facility. The non-hazardous waste storage building is used to store used oil, oily wastewater, and other non-hazardous wastes. The building is constructed with a sealed concrete slab (with sealed expansion joints) and has a complete secondary containment berm. A 7,000-gallon AST, located in the southeast corner of the building, is used to store non-hazardous oily wastewater, which is processed by Perma-Fix (Davie, Florida). At the time of the inspection, the 7,000-gallon AST was properly labeled, and no used oil was visible in the secondary containment. Non-hazardous solid wastes, including used oil filters and contaminated vermiculite, are bulked and shipped to Ogden-Martin for processing.

The LSF receiving/processing area and radioactivity lab are located in the northwest section of the building. At the time of the inspection, there was one 5-gallon container of waste glass and plastic and one 1-liter bottle of LSF samples accumulating in the lab.

The facility's maintenance shop is located in the northwest corner of the warehouse. The maintenance shop was not examined during this inspection.

A laundry room and dry-cleaning machine are located in the northeast corner of the building. The dry cleaning machine formerly used freon to launder aprons, gloves and booties for the facility. The machine was retrofitted in 1993 to use water in place of freon. The machine is still in use, and the wastewater is collected in 55-gallon drums which are sampled before disposal. Wastewater is sent to Rinker Cement Company for disposal. Non-hazardous filtration solids are sent to Ogden-Martin for disposal.

The parking lot adjacent to the northeast corner of the building is used as a household hazardous waste "amnesty day" collection point. This area is maintained by Alachua County under a separate EPA identification number. The household hazardous wastes accepted by Alachua County are processed by Perma-Fix. Household wastes which can be fuel blended (i.e., paints, solvents) are manifested to Giant Cement Company for energy recovery. Household hazardous wastes which cannot be fuel blended (i.e., pesticides, compressed gases) are manifested to Ensco Inc. (El Dorado, Arkansas) for disposal.

Analytical Laboratory/Transfer Facility Building

The southeast corner of this building is currently occupied by Perma-Fix Analytical Services. Perma-Fix Analytical Services performs fingerprint analysis on each incoming waste stream to confirm that waste received at Perma-Fix of Florida, Inc. conforms to the initial waste profile.

There was no hazardous waste accumulating in the Gas Chromatography (GC) room. The metals lab contained one Inductively-Coupled Argon Plasma (ICAP) machine. Under the ICAP machine there was one (1) 3-gallon plastic satellite container collecting D002 / D006 / D007 / D008 / D009 / D010 waste acidic water. The container was properly labeled and closed. Waste plastic and glass generated in the laboratories are managed as hazardous waste and are transferred to the LSF processing area and processed through the LSF receiving area and shipped to Ogden-Martin as non-hazardous solid waste.

The Flash/Total Halogens lab was organized into several workstations. Each workstation contained a 1/2-gallon satellite container used for F003/F005 waste glass and plastic.

The laboratory 90-day accumulation area is located in the east half of the Transfer Facility building. At the time of the inspection, there was one 55-gallon drum of F002/F003/F005 lab waste, dated 1/14/97; one 55-gallon drum of F002/F003/F005 lab waste, dated 3/21/97, one 30-gallon drum of F002/F003/F005 lab waste, dated 1/14/97; one 5-gallon container of D001/F003/F005 lab waste, dated 3/4/97, accumulating in the 90-day area. All the containers were properly closed and labeled.

The east half of the Transfer Facility building is used to store mercury-containing lamps, which are shipped to Quicksilver Environmental, Inc. (Tampa, Florida) for reclamation (Photo 4). The majority of the fluorescent tubes stored in this area are collected during household hazardous waste "amnesty days". The accumulation area was properly labeled, however broken glass was observed on the floor, adjacent to the mercury-containing lamps staging area (Photo 5). Failure to store spent mercury-containing lamps in a manner that prevents breakage of the lamps and immediately contains all releases due to accidental breakage is a violation of 62-737.720(2)(d) F.A.C. Facility personnel containerized the broken glass prior to the completion of the inspection and the facility was advised, by the inspector, to review general housekeeping procedures to ensure future releases were prevented or immediately contained.

Record Review

A review of the facility's manifests and Land Disposal Restriction (LDR) notifications revealed no discrepancies among the manifests and LDRs reviewed. A review of the facility's operating records, including biennial reports, arrangements with local authorities, training records, and inspection checklists, revealed no discrepancies.

Perma-Fix of Florida is currently a Large Quantity Generator of hazardous waste.

SUMMARY OF VIOLATIONS AND RECOMMENDED CORRECTIVE ACTIONS

40 CFR 264.31 - Design and Operation of Facility

VIOLATION

Facility failed to operate the facility in a manner which minimizes the possibility of the release of hazardous waste in the environment by storing nine 55-gallon drums of D001/F003/F005 waste paint/waste solvent with hazardous waste spilled on the outsides of the drums.

CORRECTIVE ACTION

Subsequent to the inspection, the facility overpacked the drums having overspill on the outside of the drum. No further action necessary.

40 CFR 264.173(a) - Management of Containers

VIOLATION

Facility failed to keep closed a 55-gallon drum of D001/F003/F005 waste paint/waste solvent.

CORRECTIVE ACTION

Subsequent to the inspection, the facility overpacked the drum with a faulty bung. No further action necessary

62-737.720(2)(d) - Spent Mercury Lamp Requirements for Permitted Storage Facilities

VIOLATION

Facility failed to store spent fluorescent lamps in a manner which prevents breakage and immediately contains broken glass in the event of accidental breakage.

CORRECTIVE ACTION

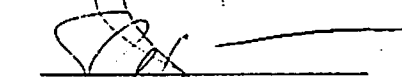
The facility cleaned the broken glass prior to the completion of the inspection and agreed to review housekeeping procedures with facility personnel. No further action necessary.



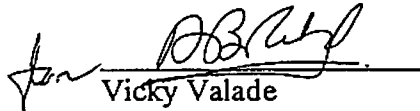
Pamela Fellabaum
Environmental Specialist
Site Inspector



Ashwin Patel
Hazardous Waste Supervisor



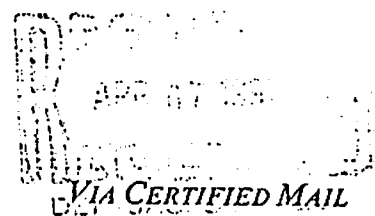
Steven Douglas, CHMM
Environmental Specialist
Site Inspector



Vicky Valade
Environmental Manager

PERMA-FIX
ENVIRONMENTAL SERVICES

APR VV RF
KTC RS PC SD



April 2, 1997

Pamela Fellabaum, Environmental Specialist
Florida Department of Environmental Protection
7825 Baymeadow Way, Suite 200B
Jacksonville, FL 32256-7590

Subject: March 28, 1997 Inspection

Dear Ms. Fellabaum:

The following is our response and corrective actions to your inspection of March 28, 1997:

- ① A refresher training class was given to all personnel on April 1 on managing spent fluorescent and high-intensity discharge (HID) lamps with emphasis being placed on housekeeping of this area.
- ② Eight drums of solids were overpacked and sent off site for disposal. A refresher training class was given on April 1 on the receiving requirements as well as a new QA/QC receiving form which has been immediately implemented. Also, Jennifer Hazard, our Compliance Coordinator, has been asked to begin conducting independent facility drum inspections.
- ③ One drum with a faulty bung was overpacked and has since been processed. The individual who performs sampling has received additional instruction to help prevent future occurrences.

If you have any questions, please feel free to contact me at (352) 395-1353.

Sincerely,

Raymond Whittle
Facility Manager

RS/cjw

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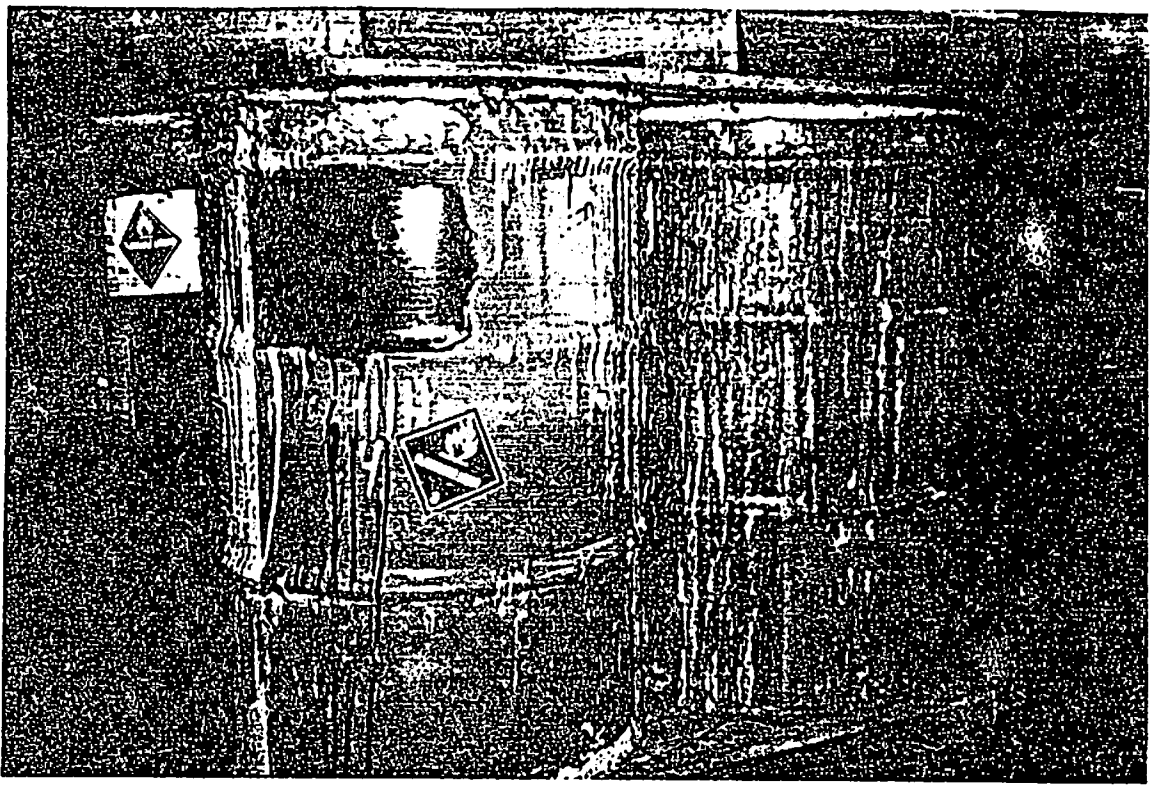


Photo 1. Photograph showing spilled waste paint/waste solvent on 55-gallon drum stored in Part B Area.

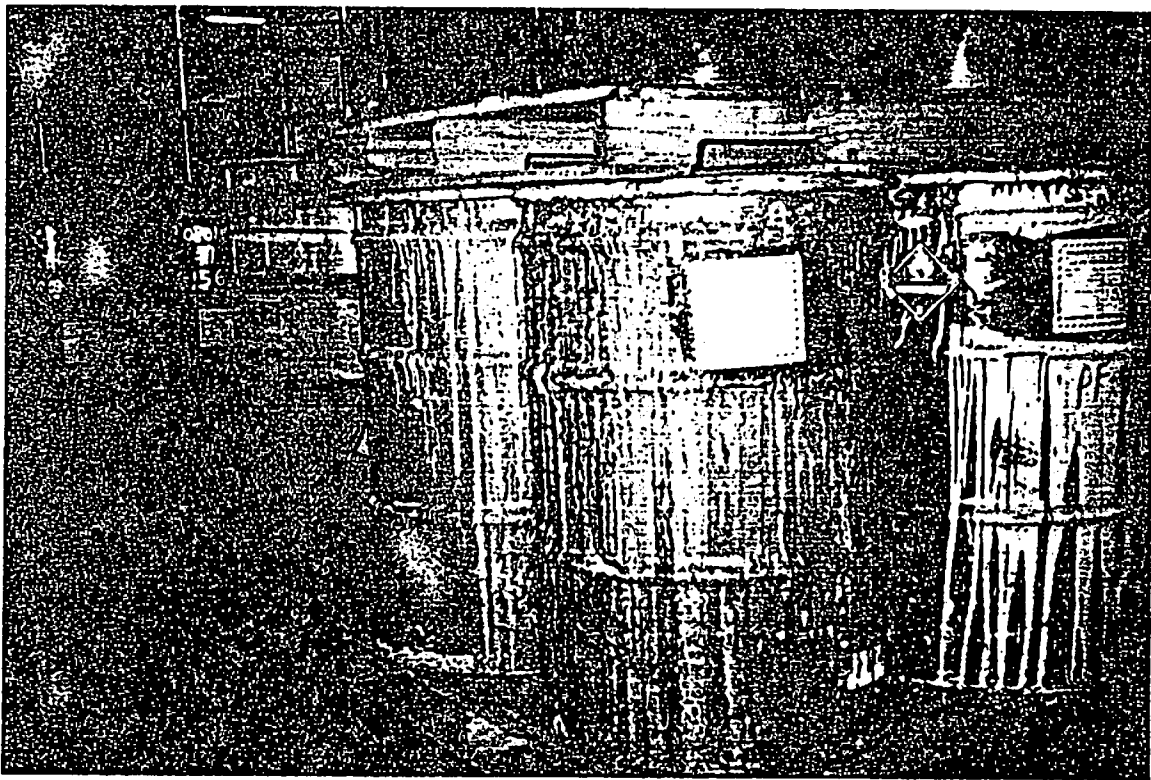


Photo 2. Photograph showing spilled waste paint/waste solvent on 55-gallon drum stored in Part B Area.

Photodocumentation: CEI

Perma-Fix of Florida, Inc.

1940 N.W. 67th Place, Gainesville, FL

March 28, 1997



Photo 3. Photograph showing waste paint/waste solvent leaking from bung of 55-gallon drum stored in Part B Area.

Photodocumentation: CEI

Perma-Fix of Florida, Inc.

1940 N.W. 67th Place, Gainesville, FL

March 28, 1997

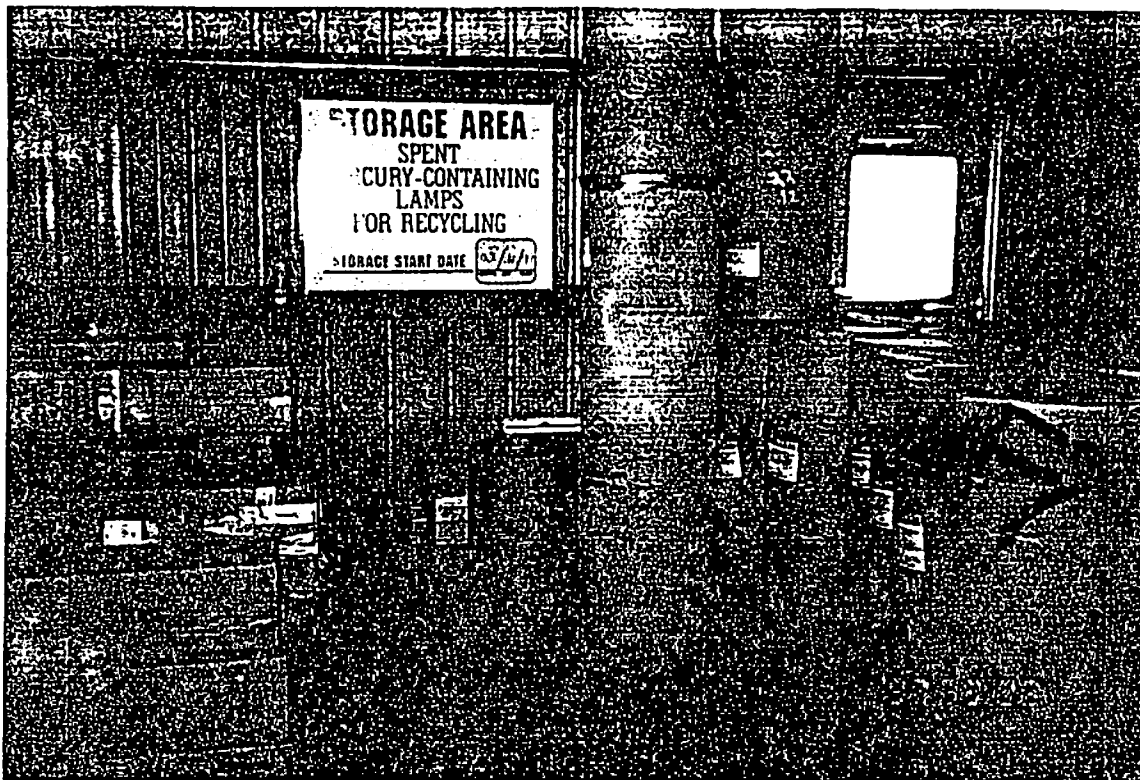


Photo 4. Photograph showing spent fluorescent lamp storage area.

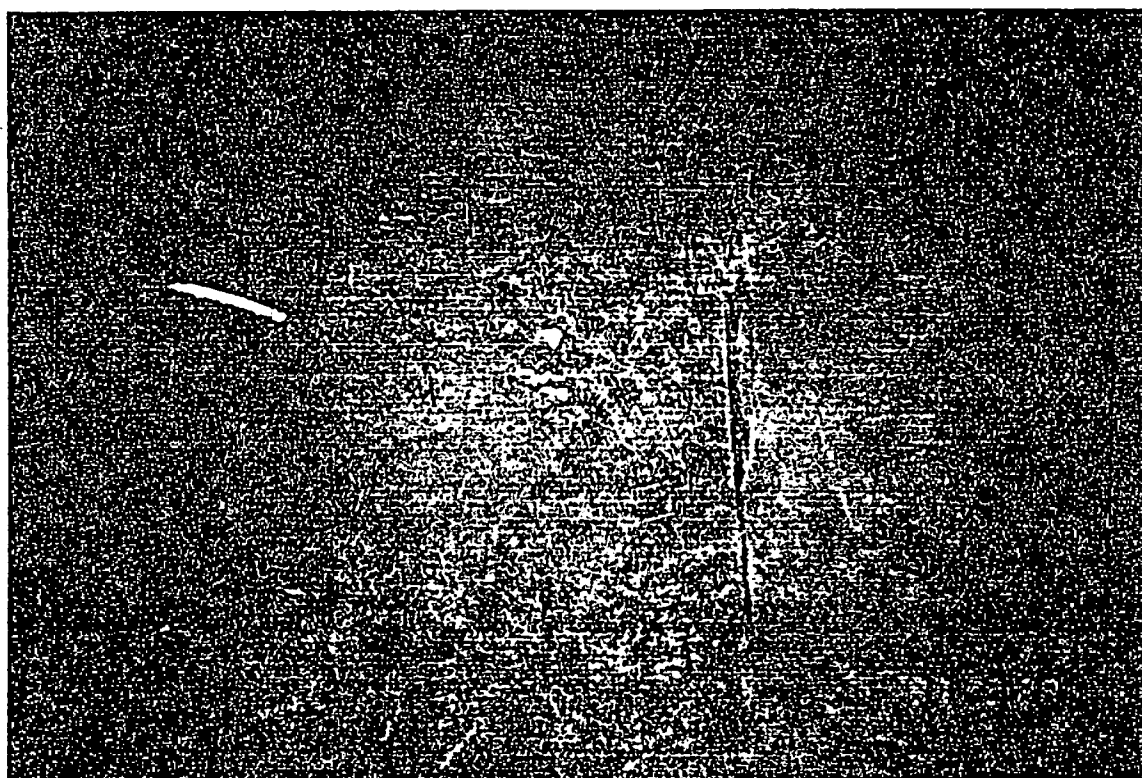


Photo 5. Photograph showing glass from broken fluorescent lamps on the fluorescent lamp storage area floor.

Photodocumentation: CEI

Perma-Fix of Florida, Inc.

1940 N.W. 67th Place, Gainesville, FL

March 28, 1997

GENERATOR CHECKLIST

Facility Name: Perma-Fix of Florida Date: 3/28/97
 Facility Representative: Raymond Whittle Facility ID # FLD 980 711 071
 SIC Codes: 1953 Inspector: Fellbaum / Douglas

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 |
|--|-----------------|-------------------------|---------------------------------------|-------------|------------------------------|
| Waste Flammable Liquid F001, F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D015, D019, D027, D028, D029, D035, D039, D040, D043 | | 60,000 gal/mo. (est) | Giant Cement SCD 003 351 699 | Y | Process |
| Waste Flammable Solids Same as above | | 4000 gal/mo. (est) | Perma-Fix Memphis TNID 991 279 480 | Y | Process |
| Hazardous Waste Water Same as above | | 100,000 gal/yr (est) | Michigan Recovery MID 060 975 844 | Y | Process |
| | | | | | |
| | | | | | |
| | | | | | |

(describe discrepancies in waste identification in narrative)

2. Has the facility obtained an EPA ID number? (40 CFR 262.12) Y ☒ N ☐
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. Y ☐ N ☒
5. Is the facility exempt from hazardous waste permit requirements?
Describe in narrative. Y ☐ N ☒

Facility: FLD 980711 071
 Date: 3/28/97

40 CFR 262 Subpart B – The Manifest

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

Item No.:

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

Number of manifests examined ~40
 Number of errors 0

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 ✓
 If so, did exception reports include legible copy of manifest and cover letter? Y N
6. Are manifests retained for 3 years? Y ✓ N

Facility: FLD 980 711 071
Date: 3/28/97

40 CFR 262 Subpart C – Pre Transport Requirements

1. Does the facility accumulate the waste on-site prior to treatment or disposal? Y ✓ N
Circle applicable accumulation units:
Containers Tanks 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? Y N ✓
If so, are the containers appropriate for the waste? (262.30) Y N
4. Are the correct diamond-shaped DOT hazard class container labels used? (262.31) Y N
5. Are containers of 110 g or less marked with the correct DOT shipping name and number? Y N
Is a label with the language required under 262.32(b) used? Y N
Is the generator's name, address and manifest document number on the label? Y N N/A
6. Are placards available to be provided to the transporter? (262.33) Y N
7. Are bulk packagings used (over 400 kg solid or 118 g liquid)? Y N
8. Are they marked and placarded properly? Y ✓ N
9. 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
10. If not, has the facility been issued an extension by the Department? (262.34(b)) Y N/A N
11. Is each container marked with the beginning date of accumulation? (262.34(a)(2)) Y ✓ N
12. Is each container and tank marked with the words "Hazardous Waste"? (262.34(a)(3)) Y ✓ N
13. Are satellite accumulation points used? Describe in narrative. Y ✓ N See report
14. Are satellite containers closed ((262.34(c)) and marked with the words "hazardous waste" or other words that describe the contents? Y ✓ N
15. Do satellite accumulation points hold 55 gallons of waste or less? Y ✓ N
16. 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/A

Facility: FLD 980 711 071
Date: 3/28/97

40 CFR 262 Subpart C -- Accumulation Requirements

Personnel Training -- 265.16

1. Do facility personnel complete hazardous waste training?
Comments: Y ✓ N
2. Is the trainer adequately trained in hazardous waste management procedures? Y ✓ N
3. Does the training cover safety? Y ✓ N
4. Does the training cover emergency response procedures, including equipment handling and inspection? Y ✓ N
5. Does the training cover hazardous waste identification and handling procedures? Y ✓ N
6. Does the facility maintain personnel training records? Y ✓ N
7. Does the facility maintain job titles and position descriptions for employees managing hazardous waste? Y ✓ N
8. Do the job descriptions include the requisite skills, education and experience? Y ✓ N
9. Do the job descriptions include a list of the positions' duties? Y ✓ N
10. Are people trained within 6 months of hiring? Y ✓ N
11. Do they work unsupervised prior to training? Y N ✓
12. Is training reviewed annually? Date of last training Feb '97 Y ✓ N
13. Are records maintained for three years? Y ✓ 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) (264.31) Y ✓ N
2. Does the facility have an internal communication or alarm system? (265.32(a)) Y ✓ 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 ✓ N
4. Describe fire control equipment. Is it adequate? (265.32(c)) Y ✓ N
5. Is spill control and decontamination equipment present? (265.32(c)) Y ✓ N

Date:

- Y N/A

- Y  N

- Y ✓ N

- $$Y \mid Z$$

Y T N

| | | |
|---|---|---|
| Y | I | N |
|---|---|---|

| | | |
|---|--|---|
| Y | | N |
|---|--|---|

- Y UNA

265 Subpart C – Contingency Plans and Emergency Response

- Y X N

- Y N

- N/A Y i N

| | | |
|-----|---|---|
| N/A | Y | N |
|-----|---|---|

N/A Y N

| | | |
|-----|---|---|
| N/A | Y | N |
|-----|---|---|

Y I N

Y I N

Y | N

$$\begin{array}{c} \text{Y} \quad \text{I} \quad \text{N} \\ \hline \end{array}$$
$$\begin{array}{c} \text{Y} \quad \text{N} \\ \text{Y} \quad \text{N} \end{array}$$

| | | |
|---|---|---|
| Y | 1 | N |
|---|---|---|

$$\begin{array}{c} \text{I} \quad \text{I} \quad \text{N} \\ \hline \text{Y} \quad \text{I} \quad \text{N} \end{array}$$

- Y N

- Y N

- Y ☒ N

Facility: FLD 986 711 071
Date: 3/28/97

40 CFR 262 Subpart D – Record keeping and Reporting

1. Is the generator keeping the following records:

Biennial Reports (262.41)

N/A Y ✓ N

Exception reports (262.42)

N/A ✓ Y N

Test Results:

N/A Y ✓ N

2. Where are records kept? at facility
3. Who is in charge of keeping records? Name Tom Hannah
Title Manifest Coordinator

4. Any additional reporting, such as contingency plan implementation reports? (262.43)

N/A ✓ Y N

5. Are records kept for a minimum of 3 years?

Y ✓ 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

USED OIL TRANSPORTER CHECKLIST

Facility Name: Permacyc, Inc.

Date: 3/28/97

Facility Representative: Ray Whittle

Facility ID #: FLD 980711071

Inspector: Fellebaum / Douglas

Registration #: _____

40 CFR 279 Subpart E -- Transporter Standards

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 point owned by same generator?

2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 251.7 after HW shipments? (If not, the used oil must be managed as hazardous)

Y _____ N N/A

3. Does the transporter process used oil incidental to transport? (279.41)

Y _____ N ✓

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 ✓ Y _____ N _____

4. Has the facility notified of used oil activities? Check EPA form 3700-12

Y ✓ 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))

Y ✓ N _____

6. Does the transporter comply with DOT requirements? (279.43(b))

Y ✓ N _____

7. If any oil is discharged during transport, does the transporter: (279.43(c))

Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?

Y ✓ N _____

Report to DOT in writing per 49 CFR 171.16?

Y ✓ N _____

Clean up any discharges until the discharge poses no threat?

Y ✓ N _____

8. Does the facility also transport used oil filters?

Y ✓ N _____

If so, are the filters stored in above ground containers which are: (52-710.850(b))

In good condition?

Y ✓ N _____

Closed or otherwise protected from weather?

Y ✓ N _____

Labeled "Used Oil Filters"?

Y ✓ N _____

Stored on an oil impervious surface?

Y ✓ N _____

Transporter Recordkeeping - 279.46

1. Do used oil acceptance records include: (279.46(a))

Name & Address of facility providing the oil for transport?

Y ✓ N

EPA ID # of oil provider (if applicable)?

Y ✓ N

Quantity of oil shipped?

Y ✓ N

Date of shipment?

Y ✓ N

Signature of oil provider, dated upon receipt?

Y ✓ N

2. Do used oil delivery records include: (279.46(b))

Name & Address of receiving facility or transporter?

Y ✓ N

EPA ID # of receiving facility or transporter?

Y ✓ N

Quantity of oil delivered?

Y ✓ N

Date of delivery?

Y ✓ N

Signature of oil receiver, dated upon receipt?

Y ✓ 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))

Y ✓ N

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 N

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 ✓ N

Transporter Certification (62-710 F.A.C.)

1. Is the transporter certified? (local governments, and < 55g/lime transporters are exempt) (62-710.500)

Y ✓ N

2. Does the facility maintain training records? (62-710.500(2)(c))

Y ✓ N

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.500(2)(d))

Y ✓ N

4. Is the facility registration form and ID number displayed? (62-710.500)

Y ✓ N

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 N/A Y ✓ N
 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

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. Y N
Rebuttable presumption of (X) N/A

4. Is used oil stored only in tanks or containers? (Circle applicable units) Y ✓ 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? Y N

6. Are containers, and tank trailers in good condition and not leaking? Y ✓ N

7. Are containers provided with secondary containment consisting of walls and floor at a minimum? Y ✓ N
 Is the containment system impervious to oil so as to prevent migration? Y ✓ N

8. Are ASTs, UST tank fill lines and containers labeled "used oil"? Y N/A N

9. Are used oil filters stored more than 10 days?
 If so, is the facility a registered used oil filter transfer facility? (62-710.850) N/A Y ✓ N

10. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? Y ✓ N

USED OIL MARKETER CHECKLIST

Facility Name: Puma Fix Date: 3/28/97
 Facility Representative: Raymond Whittle Facility ID #: FLD 980 711 071
 Inspector: Fellabauer / Don Lewis Registration #: _____

40 CFR 279 Subpart H -- Marketer Standards

1. Does the facility direct shipments of off-specification used oil to used oil burners? (except processors who burn incidentally) Y____ N ✓
Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification Y ✓ N____
2. Check other Subparts the marketer complies with. (Must comply with at least one and have EPA ID #)
 ____C - Generator ✓E - Transporter ____F - Processor ____G - Burner
3. Is the facility registered? (62-710.500(1)(c))) Y ✓ N____
4. Does the marketer only send off specification oil to burners with EPA ID Numbers (279.71(a)) Y ✓ N____
And approved Industrial Furnaces or Boilers(279.71(b)) Y____ N____
5. Does the marketer claim the used oil meets the specification by analysis? Y ✓ N____
Or by obtaining copies of generator performed analyses? (279.72(a)) Y ✓ N____
6. Does the marketer have copies of written and signed certifications from all off specification oil burners to which he has directed shipments stating that the burner: (279.75)
 Has notified EPA of its used oil management activities? Y ✓ N____
 Will only burn off spec oil in an approved device? Y ✓ N____
7. Do Off specification oil delivery records include: (279.74(a))
 Name & Address of transporter delivering oil? Y ✓ N____
 EPA ID # of transporter? Y ✓ N____
 Name & Address of receiving burner? Y ✓ N____
 EPA ID # of receiving burner? Y ✓ N____
 Quantity of oil shipped? Y ✓ N____
 Date of shipment? Y ✓ N____
8. Do on specification oil delivery records include: (279.74(b))
 Name & Address of receiving facility? Y ✓ N____
 Cross reference to analysis or other information used to determine that the oil meets the specification? Y ✓ N____
 Quantity of oil shipped? Y ✓ N____
 Date of shipment? Y ✓ N____
9. Does the marketer keep copies of records for three years? (279.72(b)) Y ✓ N____
10. Does the facility maintain records on DEP Form 62-710.900(2), including type of oil and destination or end use? Y ✓ N____
11. Does the facility submit annual reports by March 1? Y ✓ N____

SPECIFIC CONDITIONS

YES NO

Part I - General Operating Requirements

1. Does the permittee maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or constituents to air, soil or surface water which could threaten human health or the environment? [264.31]

— ☒ —

2. Does the permittee notify the Department in writing at least four weeks in advance of the date it expects to receive hazardous waste from a foreign source? [264.12]

— ☒ —

3. Prior to accepting any new hazardous wastes, does the permittee submit to the Department, for approval, a waste analysis of the proposed new waste stream?

— ☒ —

Is the analysis incorporated in the general waste analysis plan and retained on-site? [264.13]

— ☒ —

4. Will the permittee comply with the following procedures in the waste analysis plan:

- will Bulk non-LSF be analyzed for flash point, moisture content, pH, specific gravity, chlorine content and organic composition?

— ☒ —

- will mixed LS fluid be analyzed for flashpoint, moisture content, pH and specific gravity?

— ☒ —

- in the event of non-compliance, will gas chromatography be used?

— ☒ —

5. Does the permittee comply with the security provisions of 264.14(b)(2) and (c)?

— ☒ —

6. Does the facility inspect the emergency equipment on a quarterly basis?

— ☒ —

Does the permittee remedy any deterioration or malfunction discovered by an inspection? [264.15(c)]

— ☒ —
will

Were any changes, additions or deletions made to the inspection schedule?

— ☒ —

If so, were they approved by the Department?

— ☐ —

SPECIFIC CONDITIONS

YES NO

6. (continued)

Is the inspection schedule maintained as part of the facility's operating record?

X

7. Do facility personnel receive the following training schedule:

- do new employees receive orientation training?

✓

- do new employees complete a minimum of 24 hours of classroom training within six months of employment?

✓

- as well as orientation, does the training include formal classroom training and on-the-job training?

✓

- do all technicians complete an 8-hour refresher training course?

✓

Is verification of this training kept with the personnel training records and maintained on-site?

✓

Do personnel work unsupervised before training is completed?

✓

Is training received by employees annually?

8. Are "No Smoking" signs conspicuously placed wherever there is an imminent hazard from ignitable or reactive waste?

X

Are ignitable wastes kept separated and protected from sources of ignition?

X

9. a. Does the permittee maintain the following emergency equipment:

X

Telephone
Fire Extinguisher
Fire Hydrants
Absorbent Material
Respirators
Tool Box
Protective Clothing
• Aprons
• Gloves
• Goggles/
Safety Glasses

Eye wash
First Aid Kits
Fork Lift
Automatic Fire
Suppression

SPECIFIC CONDITIONS

| | | <u>YES</u> | <u>NO</u> |
|-----|----|--|--|
| 9. | b. | Is it tested and maintained to assure its proper operation? [264.33] | <u>X</u> <u> </u> |
| | c. | Is access maintained to the communications or alarm system? [264.34] | <u>X</u> <u> </u> |
| | d. | Does the permittee maintain aisle space as shown on Figure 11 of the attached permit? | <u>X</u> <u> </u> |
| | e. | Has the facility made arrangements with the local authorities? [264.37] | <u>X</u> <u> </u> |
| 10. | a. | Has the permittee carried out the provisions of the contingency plan pursuant to 264.56? | <u> </u> ^{N/A} <u> </u> |
| | | Did the permittee give proper notification when an emergency situation arose and submit to the Department a written report within 15 days of the incident? | <u> </u> <u> </u> |
| | b. | Has the contingency plan been provided to the local authorities? [264.53] | <u>X</u> <u> </u> |
| | c. | Has the contingency plan ever been amended? | <u> </u> <u>X</u> |
| | | If so, were the amendments provided to the local authorities? [264.54] | <u>X</u> <u> </u> |
| | d. | Who is the emergency coordinator? | |
| | | <u>Ray Whitte</u> | |
| | | Is she/he familiar with all aspects of the facility? [264.55] | <u>X</u> <u> </u> |
| 11. | | Does the permittee comply with the manifest requirements? | <u>✓</u> <u> </u> |
| 12. | | Does the facility's operating record include the following: [264.73] | |
| | - | the description and quantity of waste received? | <u>✓</u> <u> </u> |
| | - | the location of each hazardous waste within the facility, and the quantity at each location? | <u>✓</u> <u> </u> |
| | - | the results of the waste analyses? | <u>✓</u> <u> </u> |
| | - | a summary report and details of incidents that require implementation of the contingency plan? | <u>N/A</u> <u> </u> |

SPECIFIC CONDITIONS

YES NO

12. (continued)

- manifest numbers?
- the results of inspections (for three years)?
- annual certification of waste minimization?
- the closure plan and closure cost estimates?

Are these records maintained at the facility until completion and certification of closure?

13. Does the permittee maintain and operate the facility as a waste processing business that includes liquid and sludge bulking, scintillation vial and other small container crushing and shredding, solvent distillation, and repackaging of solid wastes contaminated by hazardous wastes?

14. Did the permittee install a temporary berm around the compacting area?

In case of a spill, will the permittee implement spill prevention and response measures that include the following:

- a. Will the flow to the tank be stopped immediately?
- b. Will the released material be removed at the earliest practicable time?
- c. Will the further migration of the leak or spill be prevented?
- d. Will the Department be notified within 24 hours unless the release is exempt?
- e. Will a written report be sent to the Department within 30 days of such occurrence?
- f. Will the facility perform the repairs, or provide secondary containment, as required, prior to returning the tank system to service?
- g. If repairs are extensive, will the facility obtain a certification from an independent, qualified, registered professional engineer prior to returning the tank system to service? Within seven (7) days of the tank system returning to service, will a copy of such certification be sent to the Department?

SPECIFIC CONDITIONS

YES NO

15. Has the permittee maintained compliance with 40 CFR 264 Subpart H - Financial Requirements?

Are all submittals in response to this Specific Condition and Specific Condition IV 4 submitted to the Financial Coordinator in the Tallahassee office?

16. Are all submittals in response to the permit (except Specific Conditions I.15. and IV 4) submitted in quadruplicate to the Hazardous Waste Supervisor in the Jacksonville office?

17. Has the permittee certified no less than annually that:

- a) it has a program in place to reduce the volume and toxicity of hazardous waste to the degree determined by the permittee to be economically practicable? and

- b) that the proposed method of treatment, storage or disposal is the most practicable method available to the permittee which minimizes the present and future threat to human health and the environment?

- c) that the permittee shall also maintain copies of certification in the facility operating record? [264.73(b)(9) and Section 3005(h)]

18. Does the permittee's Waste Minimization program required under Specific Condition I.17.a. and b. address the following topics:

- a) identify each hazardous waste stream with the source of generation?

- b) - types and amounts of hazardous waste that are generated at the facility?

- c) present and proposed method of treatment, storage or disposal that is available to the permittee?

- d) description of techniques implemented in the past for hazardous waste reduction and their effectiveness?

95-96
working on
97-98

SPECIFIC CONDITIONS

- | | <u>YES</u> | <u>NO</u> |
|---|------------|-----------|
| 18. e) an evaluation of technically and economically feasible hazardous waste reduction techniques? | — | — |
| f) a program and schedule for implementing the selected hazardous waste reduction technique? | — | — |
| 19. Does the permittee maintain compliance with 40 CFR 268 land ban requirements? | <u>X</u> | — |
| 20. Are restricted wastes identified in 40 CFR 268 Subpart C placed in a land disposal unit without meeting the requirements of 40 CFR 268 Subparts C and/or D? | — | — |
| 21. Has the permittee stored hazardous waste restricted from land disposal without meeting the requirements to 40 CFR 268 Subpart E? | — | <u>X</u> |
| 22. Are all submittals modifying major engineering features of the hazardous waste storage areas worded, signed and certified by a qualified professional engineer registered in the State of Florida in accordance with 17-730.220(5) FAC? | <u>X</u> | — |

Part II - Containers

- | | | |
|---|----------|----------|
| 1. Is the permittee only storing those wastes listed in Attachment A of the permit? | <u>✓</u> | — |
| Are containers kept closed except when adding or removing waste and are they handled in a manner that will not allow the containers to rupture or leak? [264.172] | — | — |
| If a container holding hazardous waste is not in good condition, or begins to leak, is it transferred to another container in good condition? [264.171] | — | <u>X</u> |
| 2. Does the permittee store waste in containers made of or lined with materials which will not react with or otherwise be compatible with the waste stored in them? | <u>X</u> | — |
| 3. Does the permittee conduct at least weekly visual inspections to detect leakage in the hazardous waste container storage area or its associated loading/unloading zones? [264.174] | <u>X</u> | — |

SPECIFIC CONDITIONS

YES NO

4. Does the permittee store more than 72,100 gallons of waste in containers ranging from $\frac{1}{2}$ gallon to 55-gallons or other DOT-approved containers? X
5. Has the permittee notified the Department when the capacity of the container storage area reached 90% or 64,900 gallons? X
6. For storage of drums larger than 55-gallons, does the permittee place more than four drums to a pallet or stack them more than two high? X
7. Does the permittee comply with the waste compatibility requirements of 264.177? X

If the waste from the generator has a minimal of 20% of non-compatible waste, does the permittee segregate the drums from the remaining waste in the containment area by using a temporary berm, and using a designated area only? ✓

Before the waste is combined in the storage tank, are bench top compatibility tests performed with the contents in the bulk tank to assure there is no reaction? ✓

Part III - Tanks

1. Does the permittee only store those wastes located on Attachment A in the storage tank? X
2. Does the permittee store more than 3,000 gallons in the storage tank? X
3. Has the permittee notified the Department when the volume of waste stored in the tank reached 95% capacity (2,850 gallons)? X
4. Are ignitable and reactive wastes that are placed in tank systems stored in such a way that they are protected from any material or conditions that may cause the waste to ignite or react? [264.198(a)] X

SPECIFIC CONDITIONSYES NO

5. Has the permittee complied with the protective distance requirements for the tank placement as set forth in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? [264.198(b)] X —
6. Has the permittee introduced hazardous waste into unwashed tank systems which previously held incompatible waste or material? [264.199] NA —
7. For new tank components which might have been required by the repair options of 264.196(f), did the permittee submit a written assessment, reviewed and certified by an independent registered professional engineer, which attests to the component's structural integrity? —
- Does this assessment include the requirements of 264.192? N/A —
- Did an independent qualified inspector or independent registered professional engineer inspect the installation? (264.192(b)) —
8. Does the permittee prevent the release of hazardous waste or hazardous constituents to the environment pursuant to the following:
- a) Do all new components have secondary containment as required by parts (b) and (c) of this condition prior to being put into service? ✓ —
- b) Does the secondary containment system meet the requirements of 264.193 and is it:
- (1) updated to prevent any migration of wastes or accumulated liquid to soil, ground water or surface waters? ✓ —
- (2) capable of detecting and collecting releases and run-on until the collected material is removed? ✓ —
- (3) lined with materials compatible with the waste to be stored and have sufficient structural strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses which may be induced by the environment? ✓ —

SPECIFIC CONDITIONS

YES NO

8. b) (continued)

(4) placed on a foundation or base capable of providing support to the secondary containment system? ✓

(5) provided with leak detection equipment designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours? ✓

(6) sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills or precipitation? ✓

(7) designed and operated, with the exception of double-walled tank containment, to contain 100% of the capacity of the largest tank within its boundary and also contain the precipitation due to a 25-year, 24-hour rainfall event, if run-on control is not provided? ✓

c) Is the ancillary equipment provided with secondary containment? [Except as provided for in 264.193(f)] ✓

9. Will the permittee:

a) not place hazardous wastes or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail? ✓

b) use appropriate controls and practices to prevent spills and overflows? and ✓

c) comply with the requirements of 264.196 if a leak or spill occurs? ✓

10. a) Did the permittee develop and follow a schedule and procedure for inspecting overfill controls on the hazardous waste tank? ✓

b) Are the aboveground portions of the tank system, data from leak detection or monitoring equipment, and the construction materials and area immediately surrounding the tank inspected at least once each operating day? ✓

SPECIFIC CONDITIONS

- | | <u>YES</u> | <u>NO</u> |
|--|-------------------------------------|--------------------------|
| 10. c) Are the results of the above inspections maintained in the operating record of the facility? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11. When a tank system or secondary containment system produces a leak or spill or is determined to be unfit for use, does the facility: | | |
| a) prevent the flow or addition of waste? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) remove the waste from the tank system or secondary containment system? | <input type="checkbox"/> | <input type="checkbox"/> |
| c) contain visible releases to the environment? | <input type="checkbox"/> | <input type="checkbox"/> |
| d) make the proper notifications and reports to the appropriate authorities? | <input type="checkbox"/> | <input type="checkbox"/> |
| e) provide secondary containment, repair or closure, if necessary? | <input type="checkbox"/> | <input type="checkbox"/> |
| f) provide certification of major repairs? | <input type="checkbox"/> | <input type="checkbox"/> |

Part IV - Closure

- | | | |
|---|--------------------------|--------------------------|
| 1. Will the permittee comply with the following conditions concerning closure: | | |
| a) (1) Will the facility stop receiving new waste and process all existing wastes stored in containers on-site? | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) Cease pumping additional wastes into the tank? | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) Call an EPA permitted disposal facility and ship tank contents with appropriate manifest for final disposal? | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) Clean and decontaminate the pump piping and tank by rinsing with alcohol and kerosene? | <input type="checkbox"/> | <input type="checkbox"/> |
| (5) Drain the tank and ship the rinse liquids to off-site disposal site? | <input type="checkbox"/> | <input type="checkbox"/> |
| (6) Dismantle tanks and all associated pipes, pumps, and fittings? Provide a wipe test of all surfaces and test for D, F, P, and U compounds? | <input type="checkbox"/> | <input type="checkbox"/> |

Facility not in closure

SPECIFIC CONDITIONSYES NO

1. b) Amend the closure plan in accordance with 264.112(b) when necessary? _____
- c) Will the permittee notify the Department at least 45 days prior to the date he expects to begin closure and submit a complete closure permit application? [264.112(d)] _____
- d) Within 90 days after receiving the final volume of hazardous waste, will the permittee treat or remove all hazardous waste from the site in accordance with the schedule specified in the closure plan? _____

2. Within 90 days of the issuance of the permit, will the permittee close the secondary storage area pursuant to the following:

- a) Will the drums currently stored in the secondary zone be moved to the primary permitted storage area? _____
- b) Will the asphalt be examined for its integrity and evidence of cracks or stains? _____
- c) Where cracks are found in the asphalt, will the underlying soil be sampled and analyzed for suspected contaminants at a depth of six inches and three feet? _____

If soils show contamination above the published maximum contaminant level or background (whichever is greater), will they be excavated and removed for off-site disposal at a permitted hazardous waste disposal facility? _____

- d) Will any areas on the asphalt with visible staining be excavated? _____

Will the underlying soils be sampled and analyzed for suspected contaminants? _____

Will soils showing contamination above published maximum contaminant levels or background be excavated and removed for off-site disposal at a permitted hazardous waste disposal facility? _____

- e) Will a minimum of five sampling points be designated for the Secondary Zone Unit, one at each corner and one in the center, where the underlying soils will be sampled at a depth of six inches and three feet and analyzed for suspected contaminants? _____

SPECIFIC CONDITIONS

YES NO

2. e) (continued)

Will soils showing contamination above published maximum contaminant levels or background levels be excavated and removed for off-site disposal at a permitted hazardous waste disposal facility?

W/A
— —

3. Within 30 days from the completion of any closure, will the permittee submit to the Department by Certified Mail or hand delivery, a certification signed by the permittee and an independent professional engineer registered in the State of Florida that the facility has been closed in accordance with the permit and specifications of the closure plan? [17-730.220(5) FAC]

— —

4. In addition to the requirements of Specific Condition I.15, will the permittee revise the closure cost estimate whenever there is:

- a change in the disposal cost due to changes in the regulations? or
- a change in the disposal facility?

— —
— —

Part V - Permit Modification/Renewal

1. Has the Department modified, revoked, reissued, or terminated for cause, this permit in accordance with the provisions of 17-730.290 FAC?

— ✓

Has the permittee submitted any subsequent revisions to the Department for departmental approval?

— ✓

2. Has the permit ever been modified to address the requirements of Section 3004(u) of HSWA?

— ✓