



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 3, 1995

CERTIFIED MAIL - RETURN RECEIPT

Jerry Fairchild, Service Manager
Ring Power Corporation
4900 North Main Street
Gainesville, Florida 32609

Dear Mr. Fairchild:

Ring Power Corporation
Warning Letter No. WL95-0519HW01NED
Class I Hazardous Waste Violations
DEP/EPA ID FLD 982 150 237
Alachua County - Hazardous Waste

A hazardous waste compliance inspection was conducted at your facility on January 25, 1995. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations Parts 260 through 268, as adopted in Florida Administrative Code Chapter 62-730.

During this inspection, possible violations of rules regarding hazardous waste management were noted. These possible violations are described in the "Summary of Violations" section of the attached inspection report.

You are advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$50,000 per violation per day pursuant to Section 403.727, Florida Statutes.

You are requested to contact Richard Sykes of this office at (904) 448-4320 within 10 calendar days of receipt of this Warning Letter to arrange a meeting with Department personnel to discuss the issues raised in this Warning Letter. You may wish to consult an attorney and to have the attorney attend the meeting with the Department.

DOCKET # 95.1

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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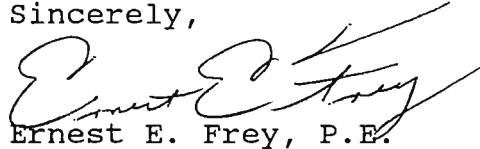


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PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. If you take acceptable corrective actions within 90 days of the date of the inspection report, the Department will not seek penalties from you. However, if you do not take appropriate corrective action 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. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

If after further investigation, the Department determines that the violations occurred and you have not taken timely corrective actions, this matter may be amicably resolved only through the entry of a Consent Order, which will include a compliance schedule and an appropriate penalty.

Sincerely,



Ernest E. Frey, P.E.
Director of District Management

↓
EEF:rs

Enclosure



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT ☐ COMPLAINT ☒ ROUTINE ☐ FOLLOW-UP ☐ PERMITTING
FACILITY NAME Ring Power Corporation DEP/EPA ID FLD 982150237
STREET ADDRESS 4900 North Main Street, Gainesville, Florida 32609
MAILING ADDRESS Same
COUNTY Alachua PHONE (904) 371-9983 DATE 1/25/95 TIME 12:00 pm

TYPE OF FACILITY:

<u>Generator Status</u>	<u>Storage</u>	<u>Treatment</u>
<input type="checkbox"/> Conditionally Exempt (<100 kg/mo)	<input type="checkbox"/> Container	<input type="checkbox"/> Tank
<input checked="" type="checkbox"/> SQG (100-1000 kg/mo)	<input type="checkbox"/> Tank	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Generator (>1000 kg/mo)	<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Thermal
<input type="checkbox"/> Non-Handler	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Chem/Phys/Bio.
	<input type="checkbox"/> Other	<input type="checkbox"/> Incinerator
		<input type="checkbox"/> Surface Impoundment
		<input type="checkbox"/> Other
<u>Transporter</u>	<u>Disposal</u>	
<input type="checkbox"/> Transporter	<input type="checkbox"/> Landfill	
<input type="checkbox"/> Transfer Facility	<input type="checkbox"/> Surface Impoundment	
	<input type="checkbox"/> Waste Pile	

2. Applicable Regulations:

☐ 40 CFR 261.5 ☒ 40 CFR 262 ☐ 40 CFR 263 ☐ 40 CFR 264
☒ 40 CFR 265 ☐ 40 CFR 266 ☒ 40 CFR 268

3. Responsible Official: Mr. Jerry Fairchild, Service Manager

4. Survey Participants & Principal Inspector: Jerry Fairchild, RP Richard Sykes, FDEP Karen Cates, FDEP

5. Facility : Latitude 29°39'06" Longitude 82°29'88"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: _____ Date Issued: _____ Exp. Date: _____

8. Pre-arranged Inspection: ☐ Yes ☒ No

Ring Power Corporation
Hazardous Waste Inspection of
January 25, 1995

PROCESS DESCRIPTION:

Ring Power Corporation of Gainesville specializes in the service and repair of heavy equipment, forklifts, generators and trucks. The facility consists of offices, a storage yard, a tool room, a parts department and a large repair garage. Approximately twenty (20) employees work at the facility. This inspection was unannounced.

The facility maintains six (6) 30-gallon parts washers containing mineral spirits, generating D001 waste mineral spirits when spent. The facility generates approximately 100 gallons per month of D001 waste mineral spirits which is manifested monthly to Safety Kleen for disposal.

The facility also generates used oil, oil filters, batteries and contaminated rags. Used oil is collected in satellite containers and is transferred to one (1) 1000-gallon above-ground tank with secondary containment located adjacent to the repair garage. The facility generates approximately 300 gallons per month of used oil which is picked up monthly by Grayco for recycling. Used oil filters are drained, crushed and collected in one (1) 30-gallon drum which is picked up monthly by Safety Kleen for recycling. The facility generates approximately twenty (20) used batteries per month which are collected and stored in the parts department and are sent monthly to Ring Power's Ocala facility for recycling. Oil and mineral spirits contaminated rags generated in the garage are collected in a closed bin and are sent weekly to Aramart Linen Service for cleaning.

Used antifreeze is filtered and recycled back into vehicles on site. The facility generates approximately one (1) spent antifreeze filter every four (4) months which is added to the used oil filter drum and picked up by Safety Kleen for recycling. The facility could not provide Toxicity Characteristic Leaching Procedure (TCLP) data for the spent antifreeze filters.

The facility does not perform painting operations. Scrap metal generated at the facility is picked up every other month by M. O'Stein of Cross City for recycling.

A review of the facility's records revealed that all manifests, Land Disposal Restriction (LDR) documents and shipping papers examined were in order. A review of the facility's operating records revealed that the facility had failed to make arrangements

Ring Power Corporation
Hazardous Waste Inspection of
January 25, 1995
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with local authorities. The facility's Modified Contingency Plan failed to include the name and telephone number of the Emergency Coordinator and the location of emergency equipment.

Ring Power Corporation of Gainesville generates approximately 100 gallons per month of D001 waste mineral spirits and is currently a Small Quantity Generator of hazardous waste.

SUMMARY OF VIOLATIONS:

The following are violations of the Florida Administrative Code (FAC) Chapters 62-730.160 and 62-730.180 which adopt and incorporate by reference Title 40 Code of Federal Regulations (CFR) Parts 262 and 265.

40 CFR 262.11 - Hazardous Waste Determination

A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:

- (a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4.
- (b) He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.

NOTE: Even if the waste is listed, the generator still has an opportunity under 40 CFR 260.22 to demonstrate to the Administrator that the waste from his particular facility or operation is not a hazardous waste.

- (c) For purposes of compliance with 40 CFR Part 268, or if the waste is not listed in Subpart D of this part, the generator must then determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - (1) Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 - (2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.
- (d) If the waste is determined to be hazardous, the generator must refer to Parts 264, 265, 268 of this chapter for possible exclusions or restrictions pertaining to management of his specific waste.

VIOLATION: Facility failed to perform a hazardous waste determination on the spent antifreeze filters being combined for disposal in the used oil filter drum.

40 CFR 262.34(d)(5)(ii) - Modified Contingency Plan

- (d) A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that:
 - (5) The generator complies with the following requirements:
 - (ii) The generator must post the following information next to the telephone:
 - (a) The name and telephone number of the emergency coordinator;
 - (b) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
 - (c) The telephone number of the fire department, unless the facility has a direct alarm.

VIOLATION: Facility failed to post the name and telephone number of the Emergency Coordinator and the location of emergency equipment as required.

40 CFR 265.37 - Arrangements with Local Authorities

- (a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:
 - (1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

Ring Power Corporation
Hazardous Waste Inspection of
January 25, 1995
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- (2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and specific fire department, and agreements with any others to provide support to the primary emergency authority;
 - (3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
 - (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.
- (b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

VIOLATION: Facility failed to make arrangements with local authorities.

RECOMMENDED CORRECTIVE ACTION:

40 CFR 262.11

- Within forty-five (45) days, facility shall perform a hazardous waste determination on the spent antifreeze filter waste stream by analyzing a representative sample for Toxicity Characteristic Leaching Procedure (TCLP) Metals, pursuant to 40 CFR 261.24.

A copy of the results of this determination shall be submitted to this office within the 45-day time frame. None of the waste is to be disposed of until written approval has been given by the Department.

40 CFR 262.34(d)(5)(ii)

- Within ten (10) days, facility shall revise their Modified Contingency Plan to include the name and telephone number of the Emergency Coordinator and the location of emergency equipment, then submit the revised plan to the Department for approval. Within one (1) day after Department approval of the plan, the facility shall post it next to a telephone in the facility.

40 CFR 265.37

- Within thirty (30) days, facility shall provide documentation to the Department that arrangements have been made with local authorities. (A copy of the certified return-receipt card will be sufficient.)

Date 1/25/94
Inspector SPICES/CAPTES
Facility ID# FLD 982150237

RCRA INSPECTION REPORT
SMALL QUANTITY GENERATOR'S CHECKLIST

Note: On multiple part questions, check those not in compliance.

Section A - Site Identification

1. Site Name: RING POWER - GAINESVILLE

Section B - Hazardous Waste Determination (262.11)

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30-261.33 - List of Hazardous Waste)? Yes ☒ No

a. If yes, list wastes, EPA numbers & quantities. _____

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity, 261.20-261.24 - Characteristics of Hazardous Waste) ☒ Yes No

a. If yes, list wastes, EPA numbers, and quantities. 0001

b. Does generator determine characteristics by testing, by product knowledge, or by applying process knowledge? ☒ Yes ☒ No

(1) If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?

Yes No

(2) If equivalent test methods used, attach copy of the test methods used.

Section C - Manifest (262.20-.23)

1. Has generator shipped hazardous waste off-site since September 22, 1986? (Subpart B - The Manifest) ☒ Yes No

a. If no, do not fill out Section C and D.

b. If yes, identify primary off-site facilities. List facilities in narrative report.

DATE 1/25

FACILITY ID _____

2. Does generator use manifest? (262.20 - General requirements)

☒ Yes ☐ No

Is EPA Form 8700-22 (Rev 9-88) used?

☒ Yes ☐ No

If no, does the generator qualify for the contractual agreement exemption? (262.20(e))

☐ Yes ☐ No

If yes, inspect manifest at random. Do all manifests reviewed include the following information?

(262.21 - Required information) (Check items not on manifest.)

a. Generator EPA ID No.

☒ Yes ☐ No

b. Manifest Document No.

☒ Yes ☐ No

c. Generator's Name, Mailing Address, Tel No.

☒ Yes ☐ No

d. Transporter(s) Name, EPA I.D. No., Telephone No.

☒ Yes ☐ No

e. Facility Name, Address, and EPA I.D. No., Telephone No.

☒ Yes ☐ No

f. DOT description of the waste

☒ Yes ☐ No

g. (1) Containers (number and type)

☒ Yes ☐ No

(2) Total Quantity (weight or volume)

☒ Yes ☐ No

h. EPA Waste No.

☒ Yes ☐ No

i. Emergency Information (optional)
(Special handling instruction, Phone No.)

☒ Yes ☐ No

j. Is the following certification on each manifest form?

☒ Yes ☐ No

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

If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

k. Signature and dates

- | | | |
|------------------------------|---|-----------------------------|
| (1) Generators | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| (2) Transporter | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| (3) Disposer (returned copy) | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

l. Indicate number of manifests inspected and number of violations. Note type of violation in report. 15
0

m. If copy of manifest from facility was not returned within 60 days, did generator file an exception report? (262.42(b) - Exception reporting) N/A ☐ Yes ☐ No

If yes, did it contain the following information?
Legible copy of manifest. ☐ Yes ☐ No

and

Cover letter explaining generator's efforts to locate waste. ☐ Yes ☐ No

n. Does (will) generator retain copies for 3 years? ☒ Yes ☐ No

Section D - Pre-Transport Requirements (262.30-34) ☒ N/A

1. Does generator package waste for transport? ☐ Yes ☐ No

If no, skip to question 8.

If yes, complete the following questions.

2. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30 - Packaging) ☐ Yes ☐ No

3. Inspect containers to be shipped.

a. Are containers to be shipped in good condition?
(Describe containers and condition; i.e., leaking or corroding or bulging.) ☐ Yes ☐ No

b. Is there evidence of heat generation from incompatible wastes in the containers? ☐ Yes ☐ No

4. Before shipping, does the generator use DOT labeling requirements in accordance with 49 CFR 172 (263.31 - Labeling)? ☐ Yes ☐ No

5. Does the generator mark each package in accordance with 49 CFR 172 (262.32 - Marking)? ☐ Yes ☐ No

6. Is each container of 110 gallons or less marked with the following label (262.32 - Marking)? ☐ Yes ☐ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits
Improper Disposal. If found, contact
the nearest police or public safety
authority or the U.S. Environmental
Protection Agency.

Generator's Name and Address _____

Manifest Document Number _____

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet. (262.33 - Placarding)
- a. Does the generator have the appropriate placards to offer the initial transporter? ☐ Yes ☐ No
- b. If no, who provides placards? _____
8. Accumulation Time (262.34 - Accumulation Time)
- a. Is facility a permitted storage facility?
Is yes, skip to question #9. ☐ Yes ☒ No
- If no, answer rest of question #8.
- b. Does the facility comply with the 180-day accumulation limit? (262.34(d)) ☒ Yes ☐ No
- c. Does the facility comply with the 6000 kg. maximum accumulation of hazardous waste? (262.34(d)(1)) ☒ Yes ☐ No
- d. Are containers used to store wastes? (262.34(d)(2)) ☒ Yes ☐ No
- If yes, complete Containers Storage Checklist for Small Quantity Generators.
- Is the beginning date of accumulation time clearly indicated? (262.34(a)(2)) ☒ Yes ☐ No
- e. Are tanks used to store wastes? (262.34(d)(3)) ☐ Yes ☒ No
- If yes, complete Tanks Checklist for Generators.
- f. While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3)) ☒ Yes ☐ No

Section E - Recordkeeping and Records (262.40-43) ☐ N/A

Explain _____

DATE _____

FACILITY ID _____

1. Is generator keeping the reports of test results where applicable? (262.40(c)) N/A ☐ Yes ☐ No

2. Where are records kept (at facility or elsewhere)?

AT FACILITY

3. Who is in charge of keeping the records?

Name JERRY FAIRELLI Title SERVICE MANAGER

4. Any additional reporting? (262.43 - Additional Reporting)
If yes, describe in narrative.

☐ Yes ☒ No

Section F - Special Condition (262.50 - International Shipments)

☒ N/A

Explain

1. Has generator received from, or transported to a foreign source any hazardous waste?

☐ Yes ☐ No

- a. If yes, has he filed a notice with the Regional Administrator?

☐ Yes ☐ No

- b. Is this waste manifested and signed by Foreign consignee?

☐ Yes ☐ No

- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?

☐ Yes ☐ No

Section G - Preparedness and Prevention (265.30-37)

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

☐ Yes ☒ No

If yes, use narrative explanation.

2. Is the facility equipped with (265.32 - Required equipment):

- a. Internal communications or alarm system?
Is it easily accessible in case of emergency

☒ Yes ☐ No
☒ Yes ☐ No

- b. Telephone or two-way radio to call emergency response personnel?

☒ Yes ☐ No

- c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination?
Is this equipment tested to assure its proper operation?

☒ Yes ☐ No

How frequently? 2 TIMES ANNUALLY

☒ Yes ☐ No

- d. Water of adequate volume for hoses, sprinklers or water spray system? ☒ Yes ☐ No

(1) Describe source of water CITY

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

3. 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) ☒ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements With Local Authorities) N/A ☐ Yes ☒ No

If N/A, explain. _____

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities) ☒ N/A ☐ Yes ☐ No

If yes, indicate primary authority. _____

Is the fire department a city or volunteer fire department? _____

6. 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) ☒ Yes ☐ No

Are they readily available to the emergency coordinator? ☒ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities) ☐ Yes ☒ No

If no, has the owner/operator attempted to do this? ☐ Yes ☒ No

8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37(b) - Arrangements with Local Authorities) N/A ☐ Yes ☐ No

Section H - Modified Contingency Plan and Emergency Procedure
(262.34(d)(4))

1. Is there an emergency coordinator on site or within short driving distance of the plant at all times? ☒ Yes ☐ No
2. Who is the emergency coordinator? TERRY FAIRCHILD ☐ Yes ☐ No
3. Is the following information posted near the telephone:
 - a. Name and telephone number of emergency coordinator? ☐ Yes ☒ No
 - b. Location of fire extinguishers, spill control material and, if present, fire alarm? ☐ Yes ☒ No
 - c. Telephone number of fire department if no direct alarm? ☒ Yes ☐ No
4. Are all employees thoroughly familiar with proper waste handling and emergency procedures as relevant to their responsibilities during normal facility operations and emergencies? ☒ Yes ☐ No
5. Does the emergency coordinator or his designee know what is the required response in the event of a fire, a spill which can be contained, or a fire, explosion or other release which could threaten human health outside the facility or reach surface water? ☒ Yes ☐ No

Date 1/25/95
Inspector SYKES
Facility ID# FD 982 150 237

CONTAINERS STORAGE CHECKLIST FOR SMALL QUANTITY GENERATORS

(40 CFR Part 265 Subpart I - Use and Management of Containers)
Except 265.176

1. Are the containers in good condition (265.171)? (Check for leaks, corrosion, bulges, etc.) ☒ Yes ☐ No
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? ☒ Yes ☐ No
3. Is the waste compatible with the containers and/or its liner (265.172)? ☒ Yes ☐ No
4. Are the containers kept closed except when adding or removing wastes (265.173(a))? ☒ Yes ☐ No
5. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak (265.173(b))? ☐ Yes ☒ No
If yes, explain using narrative.
6. Are each of the containers inspected at least weekly (265.174)? ☒ Yes ☐ No
If no, explain using narrative concerning the frequency of inspection.
7. Are incompatible wastes stored in the same containers? ☐ Yes ☒ No
If yes, explain using narrative.
8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? ☒ Yes ☐ No
If no, explain using narrative.

RCRA INSPECTION REPORT
LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility ID#: FLD 982150237 Date of Inspection: 1/25/95

Facility Name: RING POWER CORPORATION

Facility Address: 4900 N. MAIN STREET
GAINESVILLE, FL 32609

Facility Phone #: 904 371-9983 Facility Contact: JERRY FAIRCHILD

Contact's Title: SERVICE MANAGER

Persons present for Inspection: JERRY FAIRCHILD

RICHARD SYCES

KAREN CATES

Date and Time Inspection Began: 1/25 12:00 p.m.

Date and Time Inspection Ended: 1/25 1:30 p.m.

1. (a) Describe the generator's restricted waste streams (use the LDR Treatment Standards list) and the destination of each.

D001 → SAFETY KLEEN

(b) Are the wastes correctly identified? (You may need to review TOC, TSS, HOC, TCLP, PFLT, 3rd Thirds WW, NWW, Technology Acronyms, Tables 268.41, 268.42 & 268.43.) [268.7 Notices for 3rd Third includes variance until 8-8-90: Minimum Technology]

YES

(c) Is the generator storing restricted waste on site?

YES

Is the generator complying with 268.50?

YES

Is the generator complying with 262.34 as required by 268.50(a)(1)?

YES

Are the wastes identified correctly?

YES

Revision #1
Date 3-12-91

Have LDR wastes been stored over ¹⁸⁰~~90~~ ⁵⁰⁶days (generator)?

NO

If the facility is a TSD and has been storing LDR wastes for over a year, can the TSD prove (if challenged) that the reason for such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal?

N/A

(d) Does the generator have a case-by-case extension or a variance? (specify)

N/A

II. Waste with Treatment Standards

(a) Do the Notifications required by 268.7 include:

EPA Hazardous Waste #: YES

Applicable Treatment Standards or proper reference for wastes other than F001-F005, F020-F023, F026-F028, and California List (3rd Third Rule):

YES

Manifest Document #'s: YES

Waste Analysis Data, where available: YES

Certification Statement if Generator is Claiming to meet Treatment standards: YES

Revision #1
Date 3-12-91

Date Waste is Subject to Prohibitions if
Subject to a Case-By Case Extension or Variance: N/A

III. Does the generator maintain the above records on-site for five (5) years?

YES

IV. Additional Notes and Comments:

(Check for soft hammer compliance prior to May 8, 1990.)

Revision #1
Date 3-12-91