



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 10, 1995

Mr. Scott Cook
Manager - Technical Services
Environmental Remediation Services, Inc.
465 Tresca Rd.
Jacksonville, Florida 32225

Dear Mr. Cook:

Environmental Remediation Services, Inc.
Hazardous Waste Inspection of February 8, 1995
Duval County - FLD 984 261 412

Enclosed is a copy of the report documenting the February 8, 1995 hazardous waste inspection conducted by this office.

If you have any questions regarding this report or hazardous waste regulations, please contact this office for assistance. Thank you for your time and continued cooperation.

Sincerely,


Steven G. Douglas
Environmental Specialist
Hazardous Waste Section

SGD:kr

Enclosure

DOCKET # 95.4

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



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HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT ROUTINE FOLLOW-UP PERMITTING
 Environmental
 FACILITY NAME Remediation Services DEP/EPA ID FLD 984 261 412
 STREET ADDRESS 465 Tresca Rd. Jacksonville, Florida 32225
 MAILING ADDRESS same
 COUNTY Duval PHONE (904) 721-7225 DATE 02/08/95 TIME 10:00 AM

TYPE OF FACILITY:

Generator Status

Conditionally
 Exempt (<100 kg/mo)
 SQG (100-1000 kg/mo)
 Generator (>1000 kg/mo)
 Non-Handler

Storage

Container
 Tank
 Waste Pile
 Surface
 Impoundment

Treatment

Tank
 Land Treatment
 Thermal
 Chem/Phys/Bio.
 Incinerator
 Surface
 Impoundment

Transporter

Transporter
 Transfer Facility

Disposal

Landfill
 Surface Impoundment
 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. Scott Cook - Manager, Technical Services

4. Survey Participants & Principal Inspector: Scott Cook, ERS
Steve Douglas, FDEP
Stanley Tam, FDEP

5. Facility Lat/Long: 30°05'08"/81°37'30"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: N/A Date Issued: _____ Exp. Date: _____

8. Prearranged Inspection: Yes No

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

Env. Remediation Services
Hazardous Waste Inspection of
February 8, 1995

PROCESS DESCRIPTION

Environmental Remediation Services, Inc. (ERS) is a hazardous waste transporter. The facility consists of a warehouse and office space. This inspection was unannounced.

ERS owns one (1) covered truck, one (1) stakebed truck and one (1) vacuum truck. The facility does not transport hazardous waste in bulk. Drums containing hazardous waste are picked up in either the covered truck or the stakebed truck. The drums are then transported directly to a permitted hazardous waste treatment, storage or disposal facility. Occasionally, a truck containing hazardous waste drums will remain at the facility overnight. The drums of hazardous waste are not off-loaded from the truck, and the drums of hazardous waste do not remain at the facility longer than twenty-four (24) hours. If hazardous waste is stored at the facility for longer than 24 hours in the future, the facility will be required to comply with all of the FAC 62-173.171 requirements for transfer facilities.

The vacuum truck is used for neutralization of acid and transportation of neutralized waste acid solution. All acid neutralization occurs at the generator's site. The pH of the acid is adjusted as it is pumped into the vacuum truck's holding tank. The neutralized waste acid solution is then disposed of at Industrial Water Services as a non-hazardous waste.

A review of the facility's manifests revealed that all manifests reviewed were in order. In addition, a review of the facility's operating records revealed that ERS has demonstrated financial responsibility pursuant to 62-730.170(2), FAC.

No violations were noted at the time of inspection on the areas inspected.

Date 2/18/95
Inspector Douglas T. ...
Facility ID# FD 984 26412

TRANSPORTERS CHECKLIST

I. SITE NAME: Environmental Remediation Svc

II. TRANSPORTER REQUIREMENTS (40 CFR 263)

- 1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500) Yes No
 - 2. Does transporter have an EPA identification number? (263.11(a)) Yes No
 - 3. Does the transporter use manifest system as required by 263.20? Yes No
- Do the manifests contain at least:
- a. Name, address, and EPA ID of transporter? Yes No
 - b. Name, address, and EPA ID code of generator? Yes No
 - c. Name, address, identification code of designated permitted facility? Yes No
 - d. Corresponding manifest document number? Yes No
 - e. Description and quantity of each hazardous waste? Yes No
 - f. Signature of subsequent transporters? Yes No
 - g. Signatures signifying proper delivery or reasons why delivery could not be certified? Yes No
 - h. EPA waste codes? Yes No

4. International shipments: (263.20(g)) N/A
- a. Record of date waste left U.S.? Yes No
 - b. Presence of one signed copy in records? Yes No
 - c. Signed copy of manifest returned to the generator? Yes No
 - d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States? Yes No
5. For SQG waste:
- a. Is waste transported according to reclamation agreement? Yes No
 - b. Is following information recorded on a shipping paper:
 - Name, address, and EPA ID of waste generator Yes No
 - Quantity of waste accepted Yes No
 - DOT - required shipping info Yes No
 - Date waste is accepted Yes No
 - c. Does transporter carry this shipping paper during transport? Yes No
 - d. Are records maintained for three years after termination or expiration of reclamation agreement? Yes No
6. Are copies of the manifest retained for 3 years? (263.22) Yes No
7. Is there evidence of discharge of hazardous waste? (263.30) Yes No
8. Has transporter demonstrated the financial responsibility required under 17-30.170(2) Yes No
9. Does the transporter verify financial responsibility with the Department annually (17-730.170(3))? Yes No

III. TRANSFER FACILITY REQUIREMENTS (17-730.171)

- A. Does transporter comply with 10 day storage limit for transfer facilities? (263.12) Yes No
- 1. Is the hazardous waste packaged according to 262.30? (263.12) Yes No

B. General Facility Standards (265 Subpart B)

1. Security (265.14)

- a. Is the facility security system adequate to minimize unauthorized entry? ___ Yes ___ No
- b. Are signs posted and legible for 25 feet? ___ Yes ___ No

N/A

2. Inspection Requirement (265.15)

- a. Does the facility have a copy of the Inspection Plan? ___ Yes ___ No
- b. Does the facility have completed inspection logs? ___ Yes ___ No
- c. Were the deficiencies corrected in a timely manner? ___ Yes ___ No
- d. Are the inspection logs maintained at the facility for 3 years? ___ Yes ___ No

3. Personnel Training (265.16)

- a. Do management personnel complete hazardous waste training? ___ Yes ___ No
 - Is training on the job? ___ Yes ___ No
 - Is training in the classroom? ___ Yes ___ No
- b. Do laborers who handle hazardous waste complete training? ___ Yes ___ No
 - Is training on the job? ___ Yes ___ No
 - Is training in the classroom? ___ Yes ___ No
- c. Does training include:
 - Emergency response procedures? ___ Yes ___ No
 - Inspection procedures? ___ Yes ___ No
 - Operation of hazardous waste handling equipment? ___ Yes ___ No
- d. How often is training reviewed? _____
- e. Does the facility have personnel training records including:
 - Job title and description of position? ___ Yes ___ No
 - Description of employee's training. ___ Yes ___ No

N/A

- f. Is training successfully completed within 6 months of hiring/transfer to HW position? Yes No
- g. Are records maintained for three years at the facility? Yes No
- 4. Ignitable, Reactive, or Incompatible Waste (265.17)
 - a. Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? Yes No
 - b. Are "No Smoking" signs posted in the area? Yes No
- C. Preparedness and Prevention (265 Subpart C)
 - 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? Yes No
Is it easily accessible in case of emergency? 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 equipment? Yes No
Is this equipment tested to assure its proper operation? Yes No
How frequently? _____
 - d. Water of adequate volume for hoses, sprinklers or water spray system? Yes No
 - (1) Describe source of water. _____
 - (2) Indicate flow rate and/or pressure and storage capacity, if applicable. _____

N/A

- 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?

- 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 - Arrangements with Local Authorities) ___ Yes ___ No

N/A

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

1. Does the facility have a contingency plan?
(265.51 - Purpose and Implementation of Contingency Plan) Yes No
2. Is it maintained at the facility?
(265.53 - Copies of Contingency Plan) Yes No
3. Is the contingency plan a revised SPCC Plan
(265.52 - Content of Contingency Plan) Yes No
 - a. Does the plan include:
 - (1) Action personnel will take? Yes No
 - (2) Evacuation routes? Yes No
 - (3) Emergency Equipment? Yes No
 - (4) Is the emergency equipment properly inspected and maintained? Yes No
4. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator) Yes No
5. Who is the emergency coordinator? _____
6. Has the facility supplied local police and fire departments with a copy of the contingency plan?
(265.53(b) - Content of Contingency Plan) Yes No

D. Container Storage Checklist

(Subpart I - Use and Management of Containers 265.170)

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

N/A

- 4. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173) ___Yes ___No
If yes, explain using narrative.
- 5. Are each of the containers inspected at least weekly (265.174)? ___Yes ___No
If no, explain using narrative concerning the frequency of inspection.
- 6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176) ___Yes ___No
If yes, explain using narrative.
- 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.
- E. 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? (17-30.171(2)(b)) ___Yes ___No
- F. Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground? (17-730.171(2)(d)) ___Yes ___No
- G. Is a written log maintained for all waste entering or leaving the transfer facility? (17-730.171(2)(e)) ___Yes ___No
Does the log contain:
 - Generators' names? ___Yes ___No
 - Manifest numbers? ___Yes ___No
 - Dates when waste enters and leaves facility? ___Yes ___No

DATE _____

FACILITY ID _____

H. Has the facility notified the department on Form 17-730.900(6) (Transfer facility notification form)? (17-730.171(3)) Yes N/A No

I. Does the transfer facility have an EPA/DER ID number? Yes No

IV. UNREGULATED WASTES (HOUSEHOLD/CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR WASTES)

N/A

1. Does the transporter have documentation that this waste was generated by an unregulated source? Yes No

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

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

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

i) 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed 1000 kg.

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

3. Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)? Yes No

If yes, complete the Generator checklist.

V. LAND BAN WASTE

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

If yes, check appropriate box(es).

Yes No

"California List" _____
F--- List

DEPARTMENT OF ENVIRONMENTAL PROTECTION

INTEROFFICE MEMORANDUM

To: _____
To: _____
To: _____
To: _____

NORTHEAST DISTRICT - JACKSONVILLE

TO: Linda Lakes
Hazardous Waste Section, Tallahassee

THROUGH: Ashwin B. Patel, Hazardous Waste Supervisor *ABP*
Hazardous Waste Section

Vicky G. Valade, Environmental Manager *VW*
Hazardous Waste Section

Pamela Fellabaum, Environmental Specialist *PF*
Hazardous Waste Section

FROM: Steve Douglas, Environmental Specialist *SCT for*
Hazardous Waste Section

DATE: March 2, 1995

SUBJECT: Environmental Remediation Services
Hazardous Waste Inspection of February 8, 1995
Duval County - FLD 984 261 412

Attached is subject inspection report.

SGD:kr

Attachments