Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

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

FACILITY NAME TECO - Central Operations Center EPA ID # FLD 981 477 904

STREET ADDRESS 2200 East Sligh Avenue, Tampa, FL 33610

MAILING ADDRESS PO Box 111, Tampa, FL 33601-0111

COUNTY Hillsborough PHONE (813) 641-5020 DATE March 28, 2002 TIME 9:45 am

NOTIFIED AS: ☐*Non-notifier*	*CURRENT STATUS*:
☐ Non Handler	☐ Non Handler
☐ CESQG (<100 kg/mo.)	☐ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)	☐ SQG (100-1000 kg/mo.)
☒ Generator (>1000 kg/mo.)	☒ Generator (>1000 kg/mo.)
☐ Transporter	☐ Transporter
☐ Transfer Facility	☐ Transfer Facility
☐ Interim Status TSD Facility	☐ Interim Status TSD Facility
☐ TSD Facility	☐ TSD Facility
☐ Unit Type(s):	☐ Unit Type(s):
☐ Exempt Treatment Facility	☐ Exempt Treatment Facility
☐ Used Oil:	☒ Used Oil: Generator

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	☒ 40 CFR 273
☒ 40 CFR 279	☒ 62-710, FAC	☒ 62-737, FAC	☒ 62-730, FAC

3. **RESPONSIBLE OFFICIAL(s):**

Beverly Morgan, Environmental Affairs Technician J. B. Ramil, President

4. **INSPECTION PARTICIPANTS:**

Beverly Morgan; Terese Sanchez, TECO Kelly Honey, FDEP

5. **LATITUDE/LONGITUDE:** 28° 00' 42" 82° 26' 04"

6. **SIC Code:** 4911

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** N/A **ISSUE DATE:** **EXP. DATE:**

9. **Facility Description:**

The Tampa Electric Company Central Operations Center (COC) was inspected on March 28, 2002, to determine its compliance with State and Federal hazardous waste regulations. COC notified the Department of Environmental Protection (Department) of its status as a Large Quantity Generator (LQG) of hazardous waste on November 1, 1989. The inspector was accompanied throughout the inspection by Beverly Morgan, Environmental Affairs Technician, and Terese Sanchez, Environmental Specialist. The facility was last inspected by the Department's Hazardous Waste Section on May 22, 1995.

The COC is a clearing house for all Tampa Electric Company (TECO) equipment needing repairs, including its fleet of vehicles and its transformers. It also collects hazardous, nonhazardous and universal wastes from TECO's conditionally exempt small quantity generators and ships them for disposal using its EPA identification number. Hazardous wastes are generated in the COC's Investment and Recovery areas and the Vehicle Maintenance areas. TECO performs a waste analysis on each waste stream generated as part of its standard operating procedures.

The inspection began at the 90 Day Hazardous Waste Storage Area, located in Investment and Recovery, assisted by the Administrator, Wendell Welsh. The Storage Area is equipped with a grated floor over a sealed, concrete sump. Hazardous and nonhazardous wastes are stored here on opposite sides of the Storage Area, and there is also a 55-gallon satellite accumulation drum for spent aerosol spray cans, closed and labeled as to its contents. At the time of inspection, there was only one container of hazardous waste awaiting shipment for disposal, a steel 55-gallon drum containing spent parts washing solvent from Vehicle Maintenance. The drum was closed, dated and properly labeled. Hazardous wastes are disposed of at several facilities, including Southeastern Chemicals & Solvent, Sumter, SC; Heritage Environmental Services, LLC, Indianapolis, IN; and Michigan Disposal Waste Treatment Plant, Belleville, MI.

Other wastes observed in the Storage Area included two drums for collection of alkaline batteries, a drum for collection of NiCad batteries, and a drum of spent sandblasting media, the status of which was pending receipt of analyses. All these drums were closed and labeled. All universal wastes are picked up for recycling by Superior Special Service, Tampa, FL. Also observed were various spill kits around the Storage Area.

A walk through of the work areas in Investment and Recovery, as well as in other parts of the COC, revealed that the fire extinguishers were not certified for the year 2001. Correspondence received since the inspection indicates that County Fire Equipment Company, Tampa, FL, has inspected and recertified all the fire extinguishers in the COC. A vibratory polishing system is still in use at the facility and uses recirculated mineral spirits, with more added as needed. Mineral spirits is pumped into the Ultramatic Vibratory Polisher from a small supply tank and then drains into a sump where solids settle out. When the sump is full, a sump pump automatically pumps it back into the supply tank. The sump is cleaned infrequently.

Just outside the transformer repair shop in Investment and Recovery, are two, double-walled aboveground storage tanks (ASTs) for storage of used transformer (mineral) oil. A 1,000-gallon AST holds oil that is to be reused, and there is a 10,000-gallon AST for storage of "junk oil", which cannot be reused. Both ASTs were labeled "Used Oil", as well as "good oil" or "junk oil". International Petroleum Corporation (IPC), Plant City, FL, takes all used oils, including used transformer oil containing <50 ppm of PCB, generated at the COC. Used transformer oil containing ≥50 ppm of PCB is stored separately in the PCB Waste Storage Area and was formerly burned for energy recovery by one of TECO's other facilities, however, TECO now recycles it through Trans-Cycle Industries, Inc., Pell City, AL.

Soils contaminated with used transformer oil is still stored outside nearby to the south of Facility Services, formerly known as Building Maintenance. Stained soils are excavated, drummed, labeled, and brought to the Contaminated Soil Storage Area pending analyses for PCB content. If the oil is found to contain <50 ppm of PCB, the associated drum is then emptied into a nearby roll-off, ultimately going to Clark Environmental, Inc., Mulberry, FL, for thermal treatment. Soils found to be contaminated with oil containing ≥50 ppm of PCB are disposed of by Trans-Cycle Industries, Inc.

Facility Services maintains all TECO's grounds and buildings, however, no longer does any painting as this activity has been contracted out. Hazardous wastes are no longer generated in this area, but there are a 5-gallon and a 10-gallon bucket for accumulation of universal waste batteries in the shop.

Spent lamps are stored in a shed located nearby to the west of Facility Services. The shed is secured behind a locked fence. At the time of inspection, there were approximately twenty-nine boxes of spent fluorescent lamps in the shed. There was also one fiberboard cylinder which appeared to be empty. While the cylinder was appropriately labeled, none of the boxes were. Additionally, several of the boxes were either left open or, due to their poor condition, could not be closed at all. Fragile universal waste devices, such as spent fluorescent lamps, must be placed in closed containers that are structurally sound, compatible with the universal waste lamp and labeled or marked clearly with the words "Spent Mercury-Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps". Failure to properly containerize the spent lamps is a violation of **62-737.400(5)(a), FAC**, and failure to label containers of spent lamps is a violation of **62-737.400(5)(b)1, FAC**. TECO must ensure that all containers of spent lamps are structurally sound, closed and correctly labeled.

Observed on the floor of the shed were shards of broken glass indicating lamp breakage that had not been adequately addressed. In accordance with **40 CFR 273.17**, a small quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes and must determine whether any material resulting from the release is hazardous waste. Any waste determined to be hazardous must be managed in compliance with all applicable requirements of 40 CFR, Parts 260 through 272. Since the inspection, Ms. Morgan has stated that the broken lamp was cleaned up and placed into a container labeled "Universal Waste - Broken Lamps".

Vehicle Maintenance was then inspected, assisted by Robert Kinzy and Yvette Vega. The COC maintains all of TECO's vehicles and to accomplish this, is equipped with a large garage, as well as two painting booths. Just outside the garage, there is a 500-gallon AST, which appeared to be double-walled, storing used oil. The AST was labeled both "used oil" and "waste oil". TECO should remove the "waste oil" designation. Inside the garage, staff use portable dollies during oil changes, and though most contained used oil, none were labeled, a violation of **40 CFR 279.22(c)(1)**. All the dollies were marked with the words "Used Oil" during the inspection.

Outside the garage, there are two roll-offs, one designated for landfilling and one designated for incineration. Used oil filters have been discarded in the incineration roll-off. Ms. Morgan stated during the inspection that this practice was approved by the Hillsborough County Solid Waste Department, however, Hillsborough County has disallowed this practice in the past. **TECO must provide the Department with written permission from the County to dispose of its used oil filters in this manner.** Oily wastes are also discarded into the incineration roll-off, another practice that Ms. Morgan believes was approved by the County. Again, Hillsborough County does not allow this practice, and unless written permission is obtained and provided to the Department, the practice must cease. *TECO* should contact IPC about disposal options for both used oil filters and oily wastes.

Also used in the garage are four 26-gallon parts washers which are serviced on site as needed by garage staff. According to Mr. Kinzy, all four are cleaned out at the same time, and the liquid and filters are separately drummed and sent over to the 90 Day Storage Area where they are sampled, and a waste determination is performed. The Power Systems parts washer that is no longer in use should be emptied during the next cleaning cycle. Rolls of sorbent pads and other sorbent materials are located throughout the garage. Dirty rags generated are placed in a receptacle and then disposed of with the other oily wastes in the incineration roll-off. Spent coolant is accumulated in the garage's Product Storage Area. Ms. Morgan stated that spent coolant is no longer recycled on site but is now shipped to MMT Technologies, Inc., Lakeland, FL, for recycling. There were only around ten gallons of spent coolant on site at the time of inspection. The Department recommends that the spent coolant container be labeled to prevent any confusion. Spent lead-acid batteries are exchanged for core credit by Battery Express, Inc., Tampa, FL.

Other wastes observed in the garage included two 55-gallon stainless steel drums labeled "waste fuel", a 55-gallon satellite accumulation drum for aerosol spray cans and a 30-gallon container for accumulation of alkaline batteries destined for recycling. All these containers were being managed correctly. There is also a Zero Blast-N-Peen sandblasting unit in the garage with a 55-gallon satellite accumulation drum for spent media. The drum was labeled, closed and currently managed as hazardous waste, but the contents will probably be analyzed to ensure a correct waste determination when the drum is full as per TECO's standard procedure.

Just outside the garage is an oil/water separator system. Water is discharged to the storm sewer, and oil is pumped out by IPC. The contents of the separator are analyzed annually for hazardous constituents and are currently managed as nonhazardous.

The facility's paint booths, also located outside the garage, are where both vehicles and transformers are painted. Yvette Vega, who is in charge of paint booth operations, stated that there have been no product changes since the previous inspection when the filters were determined to contain no RCRA metals. The only difference is that painting is now done much less frequently. Review of MSDSs indicates the paint booth filters are still nonhazardous. The paint booth filters are changed bimonthly and discarded into the regular trash. Lacquer thinner is used to clean the spray nozzles, and each booth is equipped with 5-gallon container for accumulation of waste lacquer thinner. Both containers had hazardous waste labels and were closed. A properly managed 55-gallon satellite accumulation drum for paint waste is located in the Preparation Area, just outside of Paint Booth #1.

Substation Operations generates little or no hazardous waste but does generate used oil. Gerald Johnson, who provided assistance, said that used oil from some equipment, as well as used transformer oil, is placed into two 55-gallon drums labeled "Junk Oil" which are located inside the main building. Outside the main building, were two 3,000-gallon ASTs, one for virgin oil and one for used oil. The used oil AST was labeled "Junk Oil". Failure to label the two drums and the AST with the words "Used Oil" is an additional violation of **40 CFR 279.22(c)(1)**. TECO must relabel these containers. Mr. Johnson said that when the AST is full, the contents are screened for halogens and pumped directly into a tanker truck by IPC.

There is a Startrite unit for cutting metal which uses oil coolant in the nearby Substation maintenance shop. Mr. Johnson said it was rarely used and he didn't know if it had ever been cleaned out. Staff in the maintenance shop also use small amounts of denatured alcohol as a solvent for light cleanup.

An intercom system, fire suppression equipment and alarm systems are located throughout the entire facility.

Records were reviewed and are maintained in Investment and Recovery by Jim Cook. Inspections of the 90-Day Storage Area are performed weekly and documented, but the logs do not contain all the necessary information (e.g., number of hazardous waste drums). Failure record the date and time of each inspection, the legibly printed name of the inspector, the number and the condition of the containers, a notation of the observations made, and the date and nature of any necessary repairs or other remedial actions during weekly inspections of containers storing hazardous waste is a violation of **62-730.160(6), FAC**. Since the inspection, the log has been revised to include all the required information, although the Department recommends adding a "comments" or "corrective action description" section to the Hazardous Waste 90-Day Storage Area portion of the log rather than having the inspector simply notate the bottom of the form.

The COC has an Integrated Contingency Plan, but it has not been revised to reflect personnel changes (e.g., Michael Morgan designated as Emergency Coordinator), and waste handling changes (e.g., lamps no longer crushed on site). Failure to amend the contingency plan when the list of emergency coordinators changes is a violation of **40 CFR 265.54(d)**. TECO must revise its Plan for the COC to reflect current facility conditions in accordance with the requirements specified in 40 CFR 265.52. TECO must distribute the revisions to local authorities to comply with 40 CFR 265.53.

Training records indicate that employees, including the supervisors for each department, and the primary hazardous waste handlers, receive RCRA training at least annually. Employees are trained within six months of hiring. Manifests were reviewed, and no errors were noted. The 2001 Biennial Report has been submitted.

10. Summary of Alleged Violations:

40 CFR 265.54(d)	Failure to amend the contingency plan when the list of emergency coordinators changes
40 CFR 273.17	Failure to immediately contain all releases of universal wastes and other residues from universal wastes and determine whether any material resulting from the release is hazardous waste **(corrected)**
40 CFR 279.22(c)(1)	Failure to label eight dollies, two drums and one AST storing used oil with the words "Used Oil" **(corrected)**
62-730.160(6), FAC	Failure record the number of containers observed during weekly inspections of containers storing hazardous waste **(corrected)**
62-737.400(5)(a), (b)1, FAC	Failure to properly containerize and label spent fluorescent lamps

11. Recommendations:

40 CFR 265.54(d)	Amend or revise the Integrated Contingency Plan for the COC to reflect current facility conditions in accordance with the requirements specified in 40 CFR 265.52. Distribute the revisions to local authorities.
62-737.400(5)(a), (b)1, FAC	Ensure all boxes of spent fluorescent lamps are closed, structurally sound and marked with the words "Spent Mercury-Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps".

Inspected: _____
Kelly Honey
Environmental Specialist I

Approved: _____ Date: 2/24/02
Elizabeth B. Knauss
Environmental Manager

USED OIL GENERATOR CHECKLIST

Facility Name: TECO- CENTRAL OPERATIONS CTR Date: MARCH 28, 2002

Facility Representative: BEVERLY MORGAN Facility ID #: FLD 981 477 904

SIC Codes: 4911 Inspector: KELLY HONEY

40 CFR 279 Subpart C -- Generator Standards

1. Describe the facility's used oil streams:

WASTE DESCRIPTION	ON/Off Specification	Testing or Process Knowledge	Generation Rate	Disposal Facility and EPA ID
USED TRANSFORMER OIL (MINERAL OIL)	ON	TESTING	VERY HIGH!	IPC - PLANT CITY FLD 065 680 613
USED MOTOR OIL	ON	PROCESS KNOWLEDGE	≈ 200 G MONTHLY	SAME AS ABOVE
USED OIL/SOLIDS (O/W SEP CLEAN OUT)	ON	TESTING	≈1900 G 1/YR	SAME AS ABOVE
USED OIL / WATER (O/W SEP CLEAN OUT)	ON	TESTING	2600 G ≈ 1/YR	SAME AS ABOVE

2. Does the generator mix hazardous waste with the used oil?(279.10) Y_____ N X

3. If so, is the facility a CESQG? Y_____ N/A

4. If not, Is the oil mixed with a characteristic hazardous waste? Y_____ N/A
(describe waste)

   If so, does the facility document that the resultant mixture does not exhibit any characteristic of hazardous waste? Y_____ N/A

   Or, if the hazardous waste is only D001, that the resultant mixture is not ignitable? Y_____ N/A

   If the facility is not a CESQG, and oil is mixed with a listed hazardous waste, it must be managed as a hazardous waste.

5. Does the facility generate other materials contaminated with used oil? Y X N_____

   If so, are the materials burned for energy recovery as used oil? SENT TO INCINERATOR Y X N_____

   or, Does the facility have records documenting the residuals are not hazardous waste? Y_____ N/A

6. Does the generator claim that the used oil meets the specification in 279.11? Y_____ N X

   If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H

Facility: CO- CENTRAL OPS
Date: MARCH 28, 2002

Subpart C

1. Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? Y X N

   Are containers/tanks in good condition? (279.22(b)(1)) Y X N

   Are containers/tanks leaking? (279.22(b)(2)) Y N X

   Are containers/tanks storing used oil marked with the words "Used Oil", Including fill pipes used to fill underground tanks? (279.22(c)) Y N X

2. Are used oil filters stored in above ground containers which are: (62-710.850(6))

   In good condition? Y N X

   Closed or otherwise protected from weather? Y N

   Labeled "Used Oil Filters"? Y N

   Stored on an oil impervious surface? Y N

3. Have any releases to the environment occurred, other than a leak from a UST? Y N X

   If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service? (279.22(d)) Y N/A

4. Does the generator burn on site in a space heater? (279.23) Y N X

   If so, does he burn only DIY oil or oil generated on site? Y N/A

   Does the heater have a capacity of no more than 0.5 million BTU/hr? Y N/A

   Are combustion gasses vented to the atmosphere? Y N/A

5. Does the generator only use transporters who have received EPA Identification numbers?

   Name and number IPC- FLD 065 680 613

6. If not, does the generator self-transport only used oil generated on site or DIY oil to used oil collection centers or aggregation point owned by the generator? Y N/A

   Name and location of center: N/A

   Location of generator aggregation point: N/A

   If so, is this only in vehicles owned by the facility or facility employees? Y N/A

   Is no more than 55 gallons transported at one time? Y N/A

7. Alternatively, does the generator have a tolling arrangement with a used oil reclaimer? Y N/A

   Is a copy of the contract kept on site specifying

   type and frequency of shipments? Y N

   that the transport vehicle is owned by the processor? Y N

   that the reclaimed oil will be returned to the generator? Y N

Rev. 08/25/00

GENERATOR CHECKLIST

Facility Name: TECO - CENTRAL OPERATIONS Date: MARCH 28, 2002
Facility Representative: BEVERLY MORGAN Facility ID #: FLD 981 477 904
SIC Codes: 4911 Inspector: KELLY HONEY

40 CFR 262 Subpart A -- General Standards

1. Describe the facility's hazardous waste streams: for 2001/2002 (does not include AF study)

WASTE DESCRIPTION	EPA Waste Codes	Generation Rate	Disposal Facility and EPA ID	Correct ID?	Testing or Process Knowledge
WASTE AEROSOL SPRAY CANS	D001	≈ 1 drum every 3 mos.	HERITAGE ENV. SVCS * IND 093219012	Y	PROCESS KNOWLEDGE
SPENT PARTS WASHER SOLVENT	D001 D008	≈ 165G annually	SE CHEMICAL & SOLVENT SCD 036 275 626	Y	PROCESS KNOWLEDGE & testing
PAINT RELATED WASTES	D001 F005 D035	≈ 500G annually	SE CHEMICAL & SOLVENT	Y	PROCESS KNOWLEDGE
WASTE MINERAL SPIRITS & SOLIDS FROM POLISHER	D001 (possible some metals)	VERY LOW	SE CHEMICAL & SOLVENT		~~PROCESS KNOWLEDGE~~ TESTING
SPENT SANDBLASTING MEDIA	not yet characterized	Approx 1 drum annually	TO permitted TSD		TESTING
WASTE ACID	D002	<20G annually	HERITAGE ENV. SVCS	Y	process knowledge

(describe discrepancies in waste identification in narrative)

2. Has the facility obtained an EPA ID number? (40 CFR 262.12) Y X N

3. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? Y X N

4. Are any hazardous wastes treated or disposed of on site? Describe in narrative. Y N X

5 Is the facility exempt from hazardous waste permit requirements? Describe in narrative. Y N/A

5. Are hazardous wastes with more than 500 ppm by weight volatile organics recycled on site? Y N/A
If so, complete 265 Subparts AA and BB standards for process equipment checklists.

(* TSD ID # on manifests is that of Heritage transport LLC. (Same parent company, presumably))

Facility: CO- CENTRAL OPS
Date: MARCH 28, 2002

40 CFR 262 Subpart B -- The Manifest

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

Manifest Line Item No.:

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

Number of manifests examined 11
Number of errors 0

* see note on previous page

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

Facility: CO - CENTRAL OPS
Date: MARCH 28, 2002

40 CFR 262 Subpart C -- Pre Transport Requirements

1. Does the facility accumulate the waste on-site prior to treatment or disposal? Y X N___
   Circle applicable accumulation units:
   (Containers) *Tanks* *Drip Pads* *Containment Buildings*

2. Are containers used to ship the waste off-site? Y X N___

3. Are any containers on-site prepared for shipment? Y X N___
   a. If so, are the containers appropriate for the waste? (262.30) Y___ N___
   X PREPARED BY TRANSPORTER
   b. Are the correct diamond-shaped DOT hazard class container labels used? (262.31) Y___ N___

   c. Are containers of 110 g or less marked with the correct DOT shipping name and number? 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___

   d. Are placards available to be provided to the transporter? (262.33) Y___ N___

   e. Are bulk packagings used (over 400 kg solid or 118 g liquid)? Y___ N___

   f. Are they marked and placarded properly? Y___ N___

40 CFR 262 Subpart C -- Accumulation Requirements

1. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) (Complete tank, container and/or drip pad checklists for units accumulating waste.) Y X N___

2. If not, has the facility been issued an extension by the Department? (262.34(b)) Y___ N/A

3. Is each container marked with the beginning date of accumulation? (262.34(a)(2)) Y X N___

4. Is each container and tank marked with the words "Hazardous Waste"? (262.34(a)(3)) Y X N___

5. Are satellite accumulation points used? Describe in narrative. Y X N___

6. Are satellite containers closed ((262.34(c)) and marked with the words "hazardous waste" or other words that describe the contents? Y X N___

7. Do satellite accumulation points hold 55 gallons of waste or less? Y X N___

8. If not, is the excess marked with the date the excess waste began accumulating? (The date must be within 3 days of the date of inspection (262.34(c)(2)) Y___ N/A

Facility: TCO - CENTRAL OPS
Date: MARCH 28, 2002

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

1. Do facility personnel complete hazardous waste training? Y X N
   Comments:
2. Is the trainer adequately trained in hazardous waste management procedures? Y X N
3. Does the training cover safety? Y X N
4. Does the training cover emergency response procedures, including equipment handling and inspection? Y X N
5. Does the training cover hazardous waste identification and handling procedures? Y X N
6. Does the facility maintain personnel training records? Y X N
7. Does the facility maintain job titles and position descriptions for employees managing hazardous waste? Y X N
8. Do the job descriptions include the requisite skills, education and experience ? Y X N
9. Do the job descriptions include a list of the positions' duties? Y X N
10. Are people trained within 6 months of hiring? Y X N
11. Do they work unsupervised prior to training? Y N X
12. Is training reviewed annually? Date of last training 10-2-01 (Jim Cook) Y X N
13. Are records maintained for three years? Y X N

265 Subpart C -- Preparedness and Prevention

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

Facility: TECO - CENTRAL OPS
Date: MARCH 28, 2002

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (265.32(d)) Y X N

7. Is the emergency equipment inspected and tested periodically? Y X N
Frequency? annually - note were overdue at time of inspection - have since been re-certified

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (265.35) Y X N

9. Has the facility made emergency response arrangements with the following: (265.37)

Fire Department: HILLS CNTY Y X N
Police: HILLS CNTY SHERIFF Y X N
Hospital: TAMPA GENERAL Y X N
Emergency Response Contractor: DIVERSIFIED MARINE TECH Y X N

10. If not, has the facility attempted to do so and is the refusal documented? Y N/A

265 Subpart D -- Contingency Plans and Emergency Response

1. Does the facility have a contingency plan? 265.51) Y X N

2. Is it at the facility and easily available? (265.53) Y X N

3. Does the plan include:

Fire Response Procedure:	N/A	Y X N
Spill Response Procedures:	N/A	Y X N
Explosion Response Procedures:	N/A	Y X N
A description of arrangements with local authorities:	N/A	Y X N
Emergency Coordinators: (Name)		Y N
Addresses and telephone numbers of Emergency Coordinators:		Y N
Emergency equipment list:		Y X N
Specifications and capabilities of emergency equipment:		Y X N
Locations of emergency equipment:		Y X N
An evacuation plan and routes:		Y X N
Evacuation/alarm signals:		Y X N

4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators,applicable regulations or contingency plan failures since the last revision? Y N X

5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (265.53) Y X N

6. Is the emergency coordinator authorized to commit funds for incident response? Y N

Facility: ECO - CENTRAL OPS
Date: MARCH 28, 2002

40 CFR 262 Subpart D -- Record keeping and Reporting

1. Is the generator keeping the following records:

Biennial Reports (262.41)	N/A____ Y_X_ N____
Exception reports (262.42)	N/A_X_ Y____ N____
Test Results:	N/A____ Y_X_ N____

2. Where are records kept? JIM COOK'S OFFICE (I & R)

3. Who is in charge of keeping records? Name JIM COOK
   Title_____

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

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

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

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

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

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

Facility: ECO - CENTRAL OPS
Date: MARCH 28, 2002

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

1. Are the containers in good condition (265.171)? (Check for leaks, corrosion, bulges, etc.) Yes X No ____

2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Yes X No ____

3. Is the waste compatible with the containers and/or its liner (265.172)? Yes X No ____

4. Are the containers closed except when adding or removing wastes (265.173(a))? Yes X 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 X

6. Are each of the containers inspected at least weekly? (265.174) Yes X No ____

   Are records kept including: (62-730.160 (6) F.A.C.)
   - Date? Yes X No ____
   - Time? Yes X No ____
   - Legibly written name of the inspector? Yes X No ____
   - Number of Containers? Yes ____ No X
   - Condition of containers? Yes X No ____
   - Notes of observations made? Yes X No ____
   - Date and nature of repairs or corrective actions? COMMENTS SECTION PROVIDED Yes X No ____

7. Are ignitable and reactive wastes stored at least 50 feet from the property boundary? (265.176) Yes X No ____

8. Are incompatible wastes stored in the same containers? Yes ____ No X

9. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? (265.35) Yes X No ____

10. Is there sufficient aisle space allow to allow full inspection of the containers and labels? (62-730.160(7) F.A.C.) Yes X No ____

265 Subpart CC N/A

1. Do containers hold waste with more than 500 ppm by weight of volatile organic compounds? Yes ____ No ____

   If so, are the containers either < 26 gallons, satellite containers or kept sealed in appropriate DOT specification containers? Yes ____ No ____

   If not, does the facility comply with 265 Subpart CC emissions controls and monitoring? Yes ____ No ____

2. Which types of containers are on site? (Describe Level 2 and 3 controls in narrative.)
   - Level 1 Containers (26.4 g to 121.4 g or > 121.4 g not in light material service) ____
   - Level 2 Containers (> 121.4 g in light material service) ____
   - Level 3 Containers (>26.4 g used for waste treatment by stabilization) ____