Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ROUTINE DER/EPA ID FLD981477904

FACILITY NAME: Tampa Electric Company, Central Operations Center

STREET ADDRESS: 2200 Sligh Avenue, Tampa, FL 33610

MAILING ADDRESS: P.O. Box 111, Tampa, FL 33601-0111

COUNTY: Hillsborough PHONE: (813)228-4837 DATE: 5/22/95 TIME: 1100 hrs

TYPE OF FACILITY

Generator	Storage	Treatment
X Generator(>1000 kg/mo)	___Container	___Tank
___SQG (100-1000 kg/mo)	___Tank	___Land Treatment
___CESQG (<100 kg/mo)	___Waste Pile	___Thermal
	___Surface Impoundment	___Chem/Phys/Bio
Transporter		___Incinerator
___Transporter	Disposal	___Surface Impoundment
___Transfer Facility	___Landfill	___Exempt Off-Site
	___Surface Impoundment	
___Non Handler	___Waste Pile	___Used Oil

2. Applicable Regulations:

___40 CFR 261.5 X 40 CFR 262 ___40 CFR 263 ___40 CFR 264
X 40 CFR 265 ___40 CFR 266 X 40 CFR 268 X 17-730 F.A.C.

3. Responsible Officials:

Hugh Smith, Director of Environmental Planning

4. Survey Participants and Principal Inspector:

James Robertson - TECO	Robert Stafford - TECO
Mike Morgan - TECO	Lynn Robinson - TECO
Gwen Shofner - TECO	Susan Mueller - TECO
Greg Nelson - TECO	Charles Kovach - FDEP
Luke DiRuzza - TECO	Timyn J. Rice - FDEP

5. Facility Latitude: Longitude:

27°38'38" 82°38'09"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Process Description:

Tampa Electric Company (TECO) Central Operations Center (COC) was inspected to evaluate their compliance with state and federal hazardous waste regulations. The inspection was conducted under an administrative inspection warrant to resolve access issues. COC houses several functions related to TECOs transmission and distribution network. A site diagram indicating the location of different departments at the facility is attached. The primary hazardous waste generating operations are Investment and Recovery, Vehicle Maintenance, and Building Maintenance.

Investment and Recovery

Mr. Mike Morgan represented COC throughout the Investment and Recovery portion of the inspection. Investment and Recovery serves various functions. Assemblies and parts from throughout TECOs network are brought in to be dismantled. Some of these materials are taken apart and scrapped, while others are cleaned and rebuilt. Investment and recovery also handles waste high pressure sodium lamps and waste fluorescent lamps from throughout TECO (except for production).

A vibratory polishing system is used to clean parts that are to be returned to service. For aluminum parts, a mineral spirits wash is used. For brass and copper parts, a citrus based solvent is used. In either case, the solvent is recovered for re-use, while sediments are separated for disposal. Currently, sludge is accumulated in two 55 gallon drums kept in the 90 day hazardous waste storage area.

Fluorescent lamps are brought from TECO facilities (except production) and stored in a covered area. A fluorescent lamp crushing system is used to reduce the volume, and the crushed lamps are disposed as hazardous waste through Laidlaw Services, Inc. Since the lamps are not recycled, TECO may not transport lamps to this central accumulation point under the exemption provided in 62-737, F.A.C. COC may only accept hazardous waste mercury containing lamps from its facilities that are conditionally exempt small quantity generators, and may not accept these lamps from any small or large quantity generators without first obtaining a permit. COC is currently in violation of this requirement, since fluorescent lamps are collected from several small quantity generator facilities throughout the TECO network. However, given the recent rule making changes with regard to mercury containing lamps and devices, and the finalization of the universal waste rule, the Department does not intend to pursue formal enforcement action on this issue as long as TECO comes into compliance within 60 days of this notice. TECO COC must come into compliance with either the F.A.C. rule regulating management of spent mercury containing lamps and devices destined for recycling, or the RCRA regulations regulating transportation and disposal of hazardous waste. In addition, since there is no vapor filtration device on the fluorescent tube crushing apparatus, the Department recommends that COC monitor air emissions to ensure that

they are in compliance with OSHA regulations governing mercury vapor exposure.

High pressure sodium lamps from throughout TECOs transmission and distribution network are also consolidated for disposal at COC. This waste has been characterized for disposal as characteristically toxic for lead (D008). It is the Department's understanding that all high pressure sodium lamps contain a sodium/mercury amalgam, ranging from 8.3 mg mercury in a 50 watt lamp up to 25 mg in a 1000 watt lamp. This is in addition to the outer heat resistant glass which contains 5 to 10 percent lead or lead oxide. Analysis of a composite sample of lamps was conducted in 1992, and indicated that the waste stream did not exhibit the toxicity characteristic for mercury. Any change in the make up of the waste stream (i.e. higher wattage lamps) should be taken into consideration when making a waste determination on this waste stream.

90 Day Storage Area

The 90 day storage area is located inside the Investment and Recovery building. The area is clearly marked, and is provided with secondary containment. At the time of inspection, there were three drums in the storage area. As previously mentioned, two of the drums were being used as satellite accumulation for the vibratory polishing system sludge. The third drum contained batteries destined for recycling.

Vehicle Maintenance Department

Mr. Luke DiRuzza, Jr., Garage Supervisor, assisted in the inspection of the vehicle maintenance area. Activities in the shop include preventative maintenance, minor and major repairs, hydraulic lift servicing, vehicle painting, and other operations. Seven mineral spirits parts washers are used throughout the area. They are serviced by Safety Kleen Corporation. Mr. DiRuzza stated that the shop is in the process of changing to a non-hazardous citrus based parts washer. He expects the change to be complete within two months.

A satellite accumulation drum for contaminated gasoline is kept in the shop. Ms. Gwen Shofner, TECO Environmental Planning, stated that the waste gasoline is sent to International Oil Service where it is recovered for energy value.

Waste antifreeze is collected for recycling through an in-house recycling unit. The unit filters the solution, and separates the ethylene glycol from water. The water and ethylene glycol are then remixed in the proper ratio, and re-used. Mr. DiRuzza stated that the filter is a "bag filter", and should be changed every 90 days. He also stated that there has been no significant accumulation of solids in the filter, and that it has not been changed since the machine was purchased. A waste determination should be conducted on the waste filters prior to any future disposal event.

Several waste minimization programs are in effect in the main vehicle maintenance shop. These include antifreeze recycling, floor-dry recovery and reuse, and the move to non-hazardous parts washers.

The vehicle painting prep room and paint booth are in a separate building to the east of the main vehicle maintenance shop. In the prep room, vehicles are sanded and prepared, prior to being moved to the paint booth. Air and dust is drawn down through the grated floor and through a floor filter. In the paint booth, air is drawn through a wall filter. The filters are collected weekly for disposal as non-regulated waste. A review of the material safety data sheets for the most commonly used paints does not indicate that they contain any heavy metal pigments.

Paints are mixed in the paint booth and applied to the vehicles with a compressed air paint gun. Waste paint and lacquer thinner is collected in a 5 gallon bucket. The waste is then transferred to a 55 gallon satellite accumulation drum behind the building. At the time of inspection, the 5 gallon bucket was not labeled, and it was left open with a funnel in the opening. All satellite accumulation containers must be labeled with the words "Hazardous Waste" or a description of their contents. They must also be kept closed, except when adding or removing waste. In addition, lacquer thinner used in cleaning the paint gun spray head should be collected for proper disposal, rather than sprayed into the air.

Building Maintenance

Mr. James Robertson, Manager of Building and Real Estate Services, provided information on the Building Maintenance Department operations. Building Maintenance is responsible for painting activities throughout the transmission and distribution network. A satellite accumulation area is maintained outside of their workshop. At the time of inspection there were two drums and two small buckets of waste stored in the area. One drum was satellite accumulation of lacquer thinner from painting operations. Although the identifying label was faded and unreadable, there was another warning label indicating that the drum contained flammable liquids. The second drum was labeled as PCB waste, but was later determined to contain a mixture of non-PCB waste oil and water. The two small buckets contained waste mineral spirits. Mr. Robertson stated that the buckets were going to be dumped into a 55 gallon accumulation drum. The buckets were labeled, indicating their contents. There was a third, unlabeled, 55 gallon drum outside of the satellite accumulation area. Mr. Robertson stated that this drum contained mineral spirits that had been contaminated with some water. The department that originally had the product could not use it in its contaminated state, and had sent it to Building Maintenance to be used in their painting activities.

Contaminated Soil Storage Area

This area is also managed by Mr. Robertson of the Building Maintenance Department. At the time of inspection, several hundred

drums of contaminated soil from various spills throughout TECOs operations were stored in the area. The waste is primarily from spills of di-electric fluids and other oils. The waste is separated and bulked into roll off containers, based on whether it contains PCBs. The roll off containers are then composite sampled for pre-burn analysis parameters.

Another group of 18 drums contained oil water separator sludge from various operations throughout TECO. This waste has historically been blended with dirt from hydraulic oil spills, and sampled for pre-burn analysis. A review of a previous analysis indicated that the waste tends to have significant concentrations of heavy metals. No separate analysis on unblended oil water separator sludge was available. A waste determination must be made specifically on the oil water separator sludge before it can be managed as a non-regulated waste.

PCB Waste Storage Area

Ms. Susana Mueller, Principal Chemist, provided a tour of the PCB waste storage area. Several transformers and 55 gallon drums of PCB waste were awaiting disposal. The items were clearly labeled as PCB waste. Three drums of non-PCB contaminated waste oil were also stored in the area.

A tanker truck was parked outside of the PCB waste storage area. Non-PCB oils are collected in the tanker. The oil is tested to make sure that it is on specification, and is then delivered to Gannon Station to be burned for energy recovery.

Hazardous Waste Record Keeping Requirements

A review of the hazardous waste manifests, weekly inspection logs, employee training records, and contingency plan indicated that they were all up to date and in order. The inspection was then concluded.

8. Summary of Violations:

62-730.170, F.A.C. 62-730.240, F.A.C.	Transport and storage of hazardous waste (mercury containing lamps) from off site regulated facilities without a permit.
40 CFR 262.11	Failure to determine if oil water separator sludges meet the definition of hazardous waste.
40 CFR 262.34(c)(1)(ii)	Failure to mark the satellite accumulation container of paint waste with the words "Hazardous Waste" or with other words that identify the contents of the container.
40 CFR 265.173(a)	Failure to keep the satellite accumulation container of paint waste closed, except when it is necessary to add or remove waste.

Inspected: Timyn Rice
Timyn J. Rice
Environmental Specialist II

Approved: _____ Date: 8/5/95
Elizabeth B. Knauss
Environmental Manager

COCSITE-94X 94398 0400 12/19/94

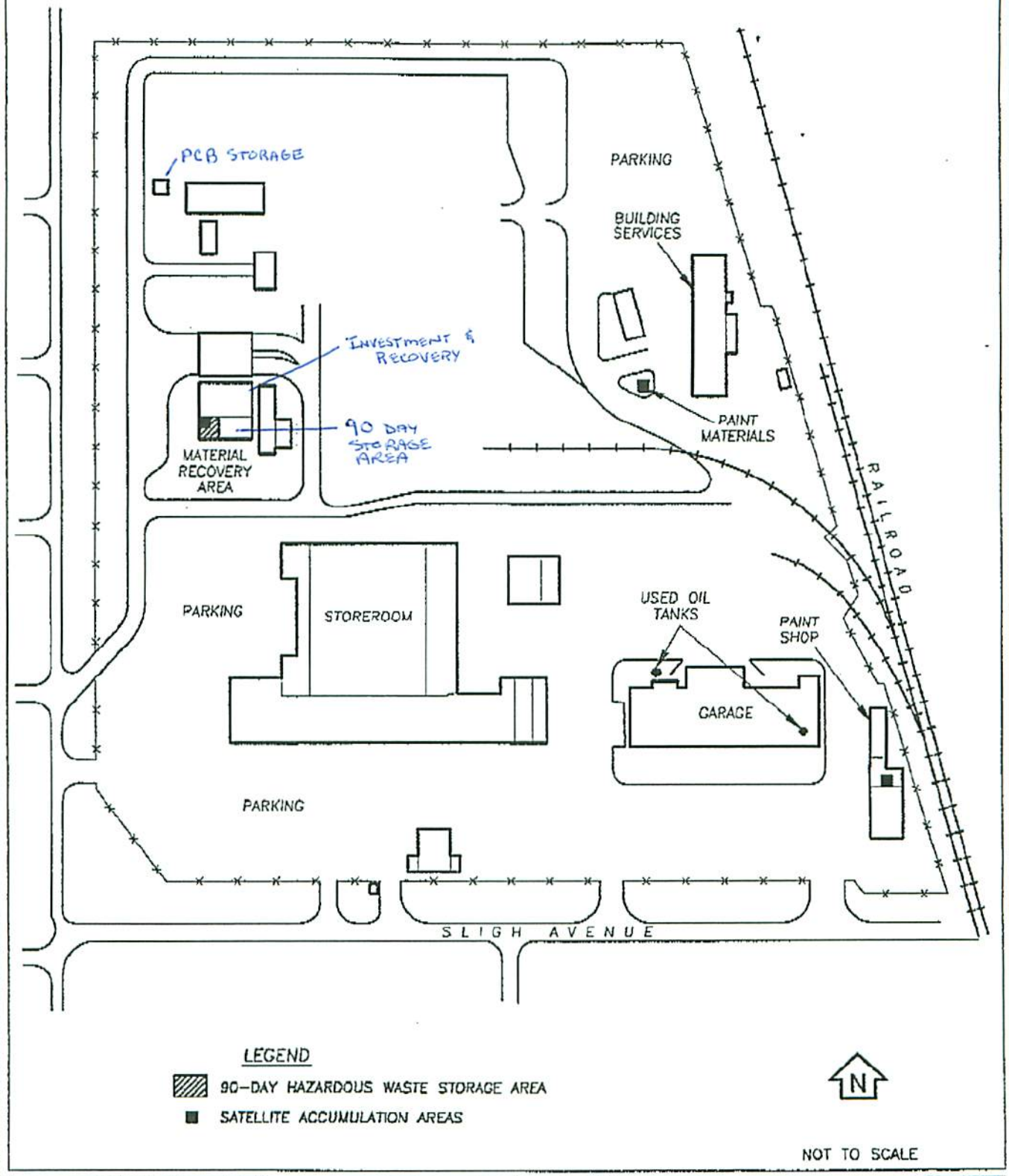

FIGURE 1.0-1.
CENTRAL OPERATIONS CENTER SITE PLAN
SHOWING HAZARDOUS WASTE STORAGE AREAS

Source: ECT, 1994.

TAMPA ELECTRIC
A TECO ENERGY COMPANY

HAZARDOUS WASTE INSPECTION
EXIT INTERVIEW

FACILITY: TAMPA ELECTRIC COMPANY - CENTRAL OPERATIONS

I.D. NUMBER: FLD981407904 DATE: 5/11/95 TIME: 1610

INTERVIEW PARTICIPANTS: T. RICE, D. KOVACH, G. SHOFNER, G. NELSON, S. MUELLER, M. MORGAN

This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-730, which adopts Federal Regulations 40 CFR Parts 260-266 by reference. It is possible that the violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the inspector will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

✓ 1. Hazardous Waste Determination (262.11). - O/W SEP SLUDGE, PAINT FILTERS
___ 2. Hazardous Waste Notification (262.12 or 263.11 or 264/265.11).
___ 3. Manifest Deficiencies or Recordkeeping and Reporting (263 Subpart B or 264/263 Subpart E).
___ 4. Personnel Training [265.16 (262.34(d) for SQG) or 264.16].
___ 5. Contingency Plan [265 Subpart D (262.34(d) for SQG) or 264 Subpart D)
___ 6. Preparedness and prevention (265 Subpart C or 264 Subpart C).
✓ 7. Container Requirements (265.34 or 264/265 Subpart I). - PAINT BOOTH SATELLITE BUCKET
___ 8. Tank Requirements (262.34 or 264/265 Subpart J).
___ 9. Operating a treatment, storage or disposal facility without a permit (403.722 F.S., F.A.C. 17-730, Section IV).
___10. Security Requirements (264/265 .14).
___11. Groundwater Monitoring (264/265 Subpart F).
___12. Closure/Post-closure (264/265 Subpart G).
___13. Failure to comply with the provisions of a Department issued permit or with the provisions of the Consent Order.
___14. Other_____

COMMENTS: _____

DER INSPECTOR SIGNATURE: Timothy Rice

FACILITY PARTICIPANT SIGNATURE: Michael D. Morgan

NOTE: BY SIGNING THIS FORM THE FACILITY PARTICIPANT IS ONLY INDICATING THAT THIS FORM HAS BEEN RECEIVED. THIS IS NOT AN ADMISSION THAT THE CITED PROVISIONS HAVE BEEN VIOLATED.

Date 5/22/95
Inspector RICE
Facility ID# FLD981477904

RCRA INSPECTION REPORT
GENERATOR'S CHECKLIST

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

Section A - Site Identification No.

1. Site Name: TAMPA ELECTRIC COMPANY, CENTRAL OPERATIONS CENTER
2. Responsible Official: HUGH SMITH
3. Survey Participants: SEE INSPECTION REPORT

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 and quantities. F002, F005, F003, VARIOUS WASTES + QUANTITIES

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

   a. If yes, list wastes, EPA numbers, and quantities. D001, D008, D009, D035, VARIOUS WASTES + QUANTITIES

   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 equivalent methods used.

3. Is generator subject to full regulation under Part 262? (If no, check appropriate exemptions) ✓ Yes ___ No

   Conditionally exempt small quantity generator (261.5 - Special requirements) (Describe small quantity disposal practices and checklist) ___
   OR
   Produces non-hazardous waste at this time (261.4 - Exclusions) ___
   OR
   Recycles, reclaims, uses or reuses hazardous waste at this time (261.6 - Exclusions) (Describe how this is achieved.) ___

rev. 1-92

OR
Being a farmer disposing of waste pesticides for his own use on his own property (262.10(d) - Farmers) ___
OR
Burns hazardous waste as a fuel for the purpose of recovering usable energy (266.30(c)(2)) ___

Section C - Manifest (262.20-262.23)

1. Has generator shipped hazardous waste off-site since November 19, 1980? (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.

2. Does generator use manifest? (262.20 - General requirements) ✓Yes ___No
   Is EPA form 8700-22 (Rev 9-88) used? ✓Yes ___No

   If yes, inspect manifests at random. Do all manifests reviewed include the following information? (262, Appendix) (Check items not on manifest.)

   a. Generator EPA ID No. ✓Yes ___No

   b. Manifest Document No. ✓Yes ___No

   c. Generator's Name, Mailing Address, Telephone No. ✓Yes ___No

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

   e. Facility Name, Address, 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) Quantity (weight or volume) ✓Yes ___No

   h. EPA waste no. ✓Yes ___No

   i. Emergency Information (optional) (Special handling instructions, 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 large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.

k. Signatures and dates

(1) Generator ✓ Yes ___ No
(2) Transporter ✓ Yes ___ No
(3) Disposer (returned copy) ✓ Yes ___ No

l. Indicate number of manifests inspected and number of violations. Note type of violation in report. 8 / 0

m. If copy of manifest from facility was not returned within 35 days, did generator file an exception report? (262.42 - Exception reporting) ___ Yes ___ No

If yes, did it contain the following information?
Legible copy of manifest ___ Yes ___ No
AND
Cover letter explaining generators efforts to locate waste. ___ Yes ___ No

n. Does (will) generator retain copies for 3 years? ✓ Yes ___ No

Section D - Pre-Transport Requirements (262.30-262.34) ___ 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? If yes, skip to question #9. ___Yes ✓No

   If no, answer rest of question #8.

   b. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) ✓Yes ___No

   If no, has the generator been granted a 30-day extension? (262.34(b)) ___Yes ___No

   If yes, explain the unforeseen/uncontrollable circumstances in the narrative.

c. Are containers used to store wastes? (262.34(a)(1)) ✓Yes ___No

If yes, complete Container Storage Checklist for Generators.

Is the beginning date of accumulation time clearly indicated? (262.34(a)(2)) ✓Yes ___No

d. Are tanks used to store wastes? (262.34(a)(1)) ___Yes ✓No

If yes, complete Tanks Checklist for Generators.

e. While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3)) ___Yes ✓No PAINT WASTE IN PAINT BOOTH

NOTE: If generator accumulates waste on site but is not a storage facility, fill out Appendix A to Generators Checklist.

9. Describe storage area. Use photos and narrative.

Section E - Recordkeeping and Records (262.40-262.43) ___N/A

Explain_____

1. Is generator keeping the following reports? (262.40 - Record keeping)
(Note: The following must be kept for a minimum of three years.)

a. Biennial reports (262.41). ✓Yes ___No

b. Exception reports where applicable (262.42). ✓Yes ___No

c. Test results where applicable. ✓Yes ___No

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

3. Who is in charge of keeping the records?

Name MIKE MORGAN / JAMES ROBERTSON / LUKE DiRosa Title

4. Any additional reporting? (262.43 - Additional Reporting) ___Yes ✓No

Section F - Special Condition (262.50 - International Shipments) ___Yes ✓No

Explain_____

DATE_____
FACILITY ID_____

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

Appendix A

Section A - Personnel Training (265.16)

1. Do management personnel complete hazardous waste training? ✓Yes ___No

   a. Is training on-the-job? ✓Yes ___No

   b. Is training in the classroom? ✓Yes ___No

2. Do laborers who handle hazardous waste complete training? ✓Yes ___No

   a. Is training on-the-job? ✓Yes ___No

   b. Is training in the classroom? ✓Yes ___No

3. Does training include:

   a. Emergency response procedures? ✓Yes ___No

   b. Inspection procedures? ✓Yes ___No

   c. Operation of hazardous waste handling equipment? ✓Yes ___No

4. How often is training reviewed? ANNUALLY

5. Does the facility have personnel training records including:

   a. Job title and description of position? ✓Yes ___No

   b. Description of employee's training? ✓Yes ___No

6. Are records maintained for three years? ✓Yes ___No

DATE_____

FACILITY I.D._____

Section B - Preparedness and Prevention (265.30-265.37)

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? ✓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? Annually

   d. Water of adequate volume for hoses, sprinklers or water spray system? ✓Yes ___No

      (1) Describe source of water C.O.T.

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

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between containers 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?_____

DATE_____
FACILITY ID_____

6. Does the owner/operator have phone numbers 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 operating record? (265.37(b) - Arrangements with Local Authorities) ___Yes ___No

Section C - Contingency Plan and Emergency Procedures (265.50-265.56)

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? (265.53 - 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? ✓Yes ___No

5. Who is the emergency coordinator? N.D. Morgan (w/in 5 blocks)

6. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53 - Copies of Contingency Plan) ✓Yes ___No

DEP 623-5561
Hosp. ✓ list not as used

RCRA INSPECTION REPORT
LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility ID#: FLD981477904 Date of Inspection: 5/24/95

Facility Name: Tampa Electric Company, Central Operations Center

Facility Address: _____

_____

Facility Phone #:( ) _____ Facility Contact: _____

Contact's Title: _____

Persons present for Inspection: _____

_____

_____

_____

Date and Time Inspection Began: _____

Date and Time Inspection Ended: _____

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

F002, F003, F005, D001, D008, D009, D035

Solvent waste managed through Safety Kleen

Lead and mercury waste managed through Chemlan.

Revision #1
Date 3-12-91

(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?

NO

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 90 days (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)

No

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

Date Waste is Subject to Prohibitions if Subject to a Case-By Case Extension or Variance:_____

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

GENERATOR LAND BAN CHECKLIST

Generator: _____ FLD _____

Date: _____ Inspector _____

Manifest #	Line Item	Date	Notice Type	Waste Codes Included	Treat-ability Group	Defects - Comments
51295	116	5/12/95	R	D008		
22096	116	2/20/95	R	D001, D035, F003, F005		
9724	116	1/24/95	R	F001, F001		
06394	116	6/3/94	R	D001, D035, F003, F005		
42994	116	4/29/94	R	D008		
02894	116	2/8/94	R	D001		
11229	116	1/12/94	R	D001, D035, F003, F005		
13094	116	1/20/94	R	D008		

PART 268 GENERATOR VIOLATIONS

1. Restricted waste identified as unrestricted.
2. No LDR notice sent to TSD for restricted waste.
3. Copy of LDR notice not kept (after 8-8-88) §268.7(a)(6).
4. Notice does not include all applicable EPA waste codes (effective 5-8-90 for all wastes -- effective as applicable for bulked shipments) §268.7.
5. Notice does not include all applicable treatment standards:
   a. Standard for 1 or more waste code omitted or incorrect;
   b. Standard for 1 or more hazardous constituent omitted or incorrect;
   c. Incorrect determination of treatability group or subcategory;
   d. California list restrictions omitted.
6. Notice does not reference manifest document number - §268.7.
7. Insufficient analytical data to support generators certification that waste meets treatment standard - §268.7(a)(2).
8. No waste analysis plan (§268.7(a)(4), 5/8/90).
9. Certification statement omitted or not signed by generator for wastes meeting treatment standards - §268.7(a)(2).
10. Notice omits or gives incorrect dates wastes subject to variance or case by case extensions will be prohibited from land disposal §268.7(a)(3)(v).
11. Lab packs incorrectly certified - contains wastes from both Appendix IV and V - §268.7(a)(7+8).
12. Ineligible facility is using tolling agreement exemption §268.7(a)(9).
13. No soft hammer certifications/demonstrations (n/a after 5/8/90).
14. Copy of generators soft hammer certification/demonstration not forwarded by storage/treatment facility to disposal facility.
15. Other

Notice Types

N. Unrestricted from land disposal
R. Restricted from land disposal - requires treatment
T. Restricted - meets treatment standards
V. Restricted - subject to variance
E. Restricted - subject to case by case extension or exemption
S. SQG tolling agreement
L. Lab pack with only Appendix IV or V wastes
H. Soft hammer certifications or demonstrations