

Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]
Sent: Monday, August 12, 2013 10:06 AM
To: Epost HWRS
Subject: RE: Safety-Kleen Systems, Inc.-Orange Park;FLD 980 847 214,First Notice of Deficiencies

Received.

Thank you,

Jeff Curtis EHS Manager | Safety-Kleen | A Clean Harbors Company | Boynton Beach, FL | jeff.curtis@safety-kleen.com
561.738.3026 (o) | 561.523.4719 (c) | 561.731.1696 (f) | safety-kleen.com



From: Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]
Sent: Tuesday, August 06, 2013 10:49 AM
To: Curtis, Jeff
Cc: Bahr, Tim; Goddard, Charles; Breland, Jabe; bob.fox@erm.com; Patel, Ashwin; Russell, Merlin; Tripp, Anthony
Subject: Safety-Kleen Systems, Inc.-Orange Park;FLD 980 847 214,First Notice of Deficiencies

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation

Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

August 6, 2013

Sent Via E-mail

Jeff.Curtis@safety-kleen.com

Mr. Jeff Curtis
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, Florida 33426

**Subject: Safety-Kleen Systems, Inc. FLD 980 847 214, Operating Permit No. 0077130-HO-007
Clay County
First Notice of Deficiencies**

Dear Mr. Curtis:

Your application for a hazardous waste permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are itemized in the enclosed Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 62-730.220, and Chapter 403.722, Florida Statutes (F.S.).

If you cannot submit this information within thirty (30) days, you must provide a detailed schedule with dates when this information will be submitted.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you would like to arrange a meeting or have any questions, please call me at 850-245-8796 or merlin.russell@dep.state.fl.us

Sincerely,

Merlin D. Russell Jr.
Professional Geologist II
RCRA Program & Permitting

MR/mdr

Enclosure

cc via e-mail w/enclosure:

Jabe Breland, DEP, Jacksonville, Jabe.Breland@dep.state.fl.us

Robert Fox, ERM, Robert W. Fox bob.fox@erm.com

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Enclosure
Safety-Kleen Systems, Inc. FLD 980 847 214
Operating Permit No. 0077130-HO-007

General Comments:

A Table of Contents would be useful in locating information.

All revisions made to the Part B in one location must be made throughout the entire Part B. As an example, we have questions on specifications to the tank and tank system. These details should all be included in Part 2 J that discusses the tank system. This should be the section of the Part B that includes and consolidates details of the tank system. Ensure that discussions on the tank system that are included in other documents, such as the Contingency Plan, are consistent with the details included in Part 2 J.

It is recommended that *future* Part Bs include regulatory citations for specific information required by the application and regulations. As an alternate, include an FDEP checklist including the location, in the Part B, where information is submitted to meet the requirement.

Specific Comments:

1. Part I.A.19: The Used Oil/Filter Transporter registration was renewed during this review, and it now expires on June 30, 2014.
2. Part I.D.3: Under Process Code, identify the specific attachment or location of the attachment.
3. Part I.D.3, Operating Information, table: For the asterisked items at the bottom of the table please clarify where you obtain the volumes listed here. Also, do you intend to count the amount of product against your permitted capacity?
4. Figure 2.2-1a needs the elevations on the contours for the figure to be useful as a topographic map.
5. Part II.A.2, Table 1, Cost Estimates: This table must include estimates for disposal of used oil and antifreeze.
6. **Contingency Plan:**
 1. We suggest a Table of Contents to assist people in finding appropriate sections of the plan quickly.
 2. Include any visits from the fire department toward meeting the requirements of 40 CFR Part 264.37(1) (familiarizing local authorities with facility). In earlier discussions, Safety-Kleen had indicated that it was your belief that there is a visit once or twice each year.

3. We would recommend that you identify and include contacts and phone numbers for neighboring businesses in the event that they should be notified.
4. It would be appropriate for the CP to include reference to Chapter 62-150, F.A.C., Hazardous Substance Release Notification.
5. It would be appropriate to include timeframes for notifications. If an RQ is exceeded, guidance suggests that the NRC be notified within 15 minutes. Subsection 62-150.300(1), F.A.C., requires that DEP be notified "... within one working day of discovery of the release¹." On page 17, item 5, if an RQ is exceeded, the National Response Center must be called immediately. Therefore, do not wait 30 minutes before calling the NRC (see also comment 6.16 below).
6. Page 4 : The bottom paragraph mentions pumping used ethylene glycol into used oil tankers. Please clarify how the used ethylene glycol is kept separate from the used oil.
7. Page 12: DEP's phone number is now 904.256.1761.
8. Page 14: DEP's address is now 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256.
9. Page 15, Spills Inside Buildings, last sentence: Explain the containment, characterization and treatment/disposal of the decontamination water.
10. Page 16 under Spill Control Procedures: We suggest the following changes:
"If a ~~harmful~~ discharge occurs:" Harmful is quite ambiguous. As an alternative, you could also write something such as: "If a solid or hazardous waste, or hazardous material discharge occurs:".
11. Page 16, end of item 2.: "All residues...should be collected for proper ~~disposal~~ characterization." The material may end up being treated or recycled and not disposed.
12. Page 16: Item three somewhat overlaps with item 5 (on page 17). Perhaps they could be combined.
13. Electronic copies of the CP/PPP should be made available to local authorities/first responders.
14. A copy of the CP/PPP should be maintained nearby off site in the event onsite access is not available.
15. Page 6, second bullet: The eyewash stands are checked for proper operation on a monthly basis but Table 5.2-1 (Inspection Schedule) has a weekly inspection scheduled.
16. Page 12, third bullet: The option of calling the Northeast District FDEP or National Response Center is noted. However, if an RQ is exceeded, you *must* notify the NRC immediately. Although reports are sometimes passed on to the NRC by State and local government agencies, a person responsible for reporting under CERCLA relies on such state or local "relay" of information at his or her own risk. This relay of information does not automatically satisfy CERCLA reporting requirements and state or local agencies are not responsible for an individual's compliance with a Federal statute. CERCLA section 103(a) specifically requires the person in charge of a facility to report immediately to the

¹ Also, any release to the environment, unless exempt per 264.96(d)(2) of this section, must be reported to the Regional Administrator (FDEP) within 24 hours of its detection. If the release has been reported pursuant to 40 CFR part 302, that report will satisfy this requirement (40 CFR 264.196(d)(1)).

- NRC a release of a hazardous substance whose amount equals or exceeds the assigned RQ. If the appropriate information is not received within an appropriate timeframe at the NRC, the person responsible for CERCLA reporting still may be found not to have complied with the section 103 notification requirements (see also comment 6.5 above).
17. Page 18 discusses spill reporting procedures. Your permit has, and will have additional requirements for reporting. If a De Minimis cleanup is undertaken, Safety-Kleen is required to submit a report to the Hazardous Waste Regulation Section (see condition Part V.5 of your current permit). Also, if the spill is not entirely cleaned up, SWMU reporting is also required (see condition Part V.2 of your current permit).
 18. Page 21, Tank Area: How do you verify that no spill has occurred? Water that has not been properly characterized that is discharged to the ground must be considered a potential SWMU requiring confirmatory sampling.
 19. Page 22, Decontamination: Does this apply to any spill anywhere on the facility, or only to spills in certain areas? Also please document how visual inspection can be an indicator of successful decontamination.
 20. Page 23, paragraph 2: Explain in more detail the emergency alarms that are available. The high level alarms for the tanks are discussed in the Tanks section (and mentioned in other parts of your application. I was unable to find information on the alarms at the return/fill station or warehouse. Are these fire alarms? Also, the last sentence is not clear. Is the water pressure supplied by the City of Orange Park sufficient for fire fighting purposes or does it require supplemental equipment to increase the pressure?
 21. Tables 5.6-1 and 5.8-1:
 - a. The various alarms should be included.
 - b. Also, is any type of screening device such as an OVA, PID, etc. kept on site and used for screening wastes or air releases if needed?
 - c. Correct the inconsistencies between the tables and the figures (e.g., location and number of fire extinguishers. See also various locations on Figure 5.6-1).
 22. Appendix A: Please supply copies of the executed letters.

7. Training:

Page 33, paragraph 3: It appears that Table 6.1-12. Should be referenced.

Table 6.1-1: How do the items in the "Topic" column correspond to items in the "Course" column?

8. Table 6.1-15: The WAP, page 11, paragraph 4 states that "...the service representative will take a sample of the waste and then seal the container and label it as hazardous waste." Training for the service representative must include waste sampling including the use of proper sampling equipment, preservation, labeling, chain-of-custody and other tasks associated with representative sampling. DEP's Waste Sampling SOP is located at: <http://publicfiles.dep.state.fl.us/dear/sas/sopdoc/2008sops/fs5000.pdf>

9. Waste Analysis Plan: In discussions with Jeff Curtis on July 1, 2013, there is no laboratory at the Orange Park facility. However, some sampling and analysis is performed when non-conforming wastes are suspected (See sampling procedures on page 10, paragraph 2, and the Waste-Specific Criteria in the WAP, pages 12-15). Accordingly, the section entitled Waste Analysis at the Recycle Facility on page 16 must be updated, including Tables 7.2-1 through 7.2-4, to reflect the sampling and analyses that is actually being performed by the service representatives. Although there are probably many similarities, there are some differences. As an example, the frequency of sampling would be different. For suspected nonconforming wastes, the frequency would be "as needed" while the sampling for the annual characterization is on a routine basis. To assist you, EPA's WAP checklist is enclosed (Enclosure B). Keep in mind that information requested in the checklist, such as the Facility Description, is already included in other parts of your Part B, and need not be reiterated in the WAP.

10. Page 6, Aqueous Parts Washer Solvent: The text states that the solvent may or may not be hazardous for TCLP constituents. How does Safety-Kleen determine which solvent is hazardous, and what does Safety-Kleen do when a hazardous solvent is discovered (Most of these aqueous parts washers are non-hazardous, but what safeguards are in place to catch the ones that are hazardous)? The same question applies to the Aqueous Brake Cleaner.

11. Recordkeeping Requirements (located in WAP):

The following items must be added to this section:

1. Discussion of operating record retention (three years per 40 CFR Part 264.73(b)) and format (paper, electronic).
2. Notices of planned changes to the permitted facility (270.30(l)(1)).
3. Notices of anticipated non-compliance situations at the facility (270.30(1)(2)).
4. 24-hour report of non-compliance situations which may endanger health or the environment (270.30(1)(6)).
5. Recordkeeping requirements for compliance with Subparts BB and CC.

Part II.B Container Storage:

12. Page 1, paragraph 2: Include the dimensions of the warehouse, and dimensions of the container storage area as you did with the Paint Waste Shelter.

13. Page 2, paragraph 3: Please include the Canadian Portland Cement Association study referenced here.

14. Page 7, paragraph 4: The reference to the Medley Branch should be for the Orange Park Branch.

15. Figure 8.4-1 (inspection checklist):

1. Is antifreeze stored in 55-gallon drums? Figure 8.1-3 identifies a 6,000 gallon used antifreeze storage tank, and there is no text that discusses management of ethylene glycol in containers.
2. Page 1 includes checking batteries in 5- and 16-gallon containers. Elsewhere in the Part B, there is no discussion on managing batteries (as hazardous waste or recycling). If batteries are managed, then update the Part B to reflect battery management. If they are not managed at this location, then they should be removed from the checklist.

16. Provisions for preventing or managing run on (Part II.B.1.b(4)) must be provided. Although it appears that the warehouse floor is above grade (if so, explicitly state so in this section), it is not clear if this is the case with the paint shelter.

17. Figures 8.1-1 and 8.1-2: What direction do the floors drain? It appears in Figure 8.1-2 that the floors drain away from the containment. What happens when any one containment unit overflows? Are all containment units interconnected such that they form a single containment volume?

**18. Part II.C Tank Systems:
Tanks Tab**

Page 1, paragraph 2:

1. There are some inconsistencies in this paragraph. The text indicates four above-ground tanks are present, three 15,000 gallon tanks and one 12,000 tank. The fourth tank is probably the 12,000 gallon horizontal tank used for virgin product. This discussion also leaves out the 6,000 gallon antifreeze tank.
2. For the tank, discuss any pressure controls, safety cutoff valves, the Moormann analog automatic tank gauge float, etc.
3. Identify the type of coating on the outside of the tank.
4. Indicate that the tank bottom is supported by a carbon steel skid on a 6" concrete slab
5. Although entitled "Tank System Specifications", there is no information on the ancillary equipment. Include descriptions of the pipes (construction material, diameter(s), etc. Are they double-walled or within secondary containment? Although a partial figure is included in the Subpart BB Section, a figure must be included that shows the layout of the piping system from the wet dumpsters to the tanks, transfer pumps, instrumentation and process flow. Include locations of valves, etc. How are the pipes connected (threaded, welded, etc.)?
6. Indicate that the tanks are grounded.
7. Include the secondary containment calculations for the tank farm.

19. Tanks, page 4, paragraph 2: The last sentence should reference Appendix C rather than Appendix D.

20. Page 4, Tank System Inspections: You may want to discuss the automatic monitoring system that is going to be installed and used in the future. If you describe

the system and how it is to be used, then it can be included in the permit renewal. Although you may not know for certain when its installation will be completed, an expected completion date can be used for now.

21. Page 7 Notifications: More specifically, 40 CFR Part 264.196(d)(2) exempts spills *equal to* or less than one pound. It would be appropriate to include the citation in the text, and this language should also be added to the Contingency Plan.

22. Page 7 Subsequent Reporting: Because reporting requirements vary (e.g., if an RQ is exceeded, the NRC must be notified immediately; reporting to FDEP has other timeframes and requirements (Chapter 62-150, F.A.C., permit conditions, etc.). For consistency, the easiest way to address this is to simply reference the reporting requirements in the Contingency Plan.

23. Information for the piping from the wet dumpsters to the tanks is not included (pipe diameters, construction material, location of pumps, valves and other appurtenances). It is noted that Figure 11.1-1 (Tab Part 2 S) illustrates some of this information.

24. **Part 2 J Tab**

Tab Part 2 J appears to be substantially redundant information, and should be removed. I did not do a line-by-line review but if a specific detail is noted in this section that is not mentioned elsewhere in the Part B, this information can be moved to that section. Note the following comparisons:

	<u>Other Location in Part B</u>
Page 1, Part II.J.1.a	This is the same information as the Tanks Tab, page 1, paragraph 2 and page 3, last paragraph
Page 1, Part II.J.1.b	This is the same information as the Tanks Tab, page 4, paragraph 3
Page 1, Part II.J.1.c	Except for the dimensions, these paragraphs contain the same information as Part 2 B, page 1, paragraphs 2 and 3. Also, the berm here is 6-inches while it is 4-inches in figures.
Page 1, Part II.J.1.d	Part 2 B, page 1, last paragraph. This paragraph contains nearly the same verbiage and additional information at the end of the paragraph.
Page 2, Part II.J.2	The maximum inventory of waste is in the closure plan at the bottom of page 2.
Page 2, Containers	Containers, Containment System, Paint Waste Shelter, FRS Waste and Transfer Waste are already located in Part 2 B, pages 1-3.
Page 4, External Factors	Already contained in the Contingency Plan, pages 27-28.

Page 5, Inspection Procedures Although not identical, this same information is located in the Contingency Plan, pages 6-9.

Part II.K Closure:

25. Page 3, second bullet: Add petroleum constituents to the parameter list.
26. Page 5, first bullet; page 6, bullet 3: GCTLs are not necessarily appropriate decontamination levels for rinsewaters although the verbiage on page 3, second bullet, indicates that the container storage area will be decontaminated to meet FDEP's guidance at the time.
27. Page 6, first bullet:
 1. The last sentence should probably read, "...will be sampled at ~~two~~ the following locations, as follows:"
 2. Also, we recommend that prior to sampling, you consult with the Department on the number of sampling locations, and specific locations. This sampling will be based, in part, upon circumstances such as history of spills, and physical condition of containment.
28. Page 6, second bullet: Add petroleum constituents to the parameter list.
29. Page 8, first bullet: The active life of a facility continues until FDEP receives the certification of closure (See definition of "*Active life of a facility*" in 40 CFR Part 264.10).

Part II.P:

30. The waste recycling operations box should be checked as antifreeze and mercury-containing devices/bulbs are stored for recycling.
31. Page 1, SWMU-3: It would be appropriate to add that the location of the original SWMU-3 was located at the Allied Product Storage Area next to the Paint Shelter.
32. Page 1, SWMU-4: According to the RFA, this SWMU was removed. Because it no longer exists, we will note that in the permit. However, the location of this SWMU in the original RFA was immediately east of the northern used oil storage tank. I have enclosed a copy of the RFA's figure for your convenience (Enclosure A). Figure Part II-Q identifies the location of SWMU-4 as the Allied Product Storage Area. Resolve this discrepancy.
33. Page 1, SWMU-7: Your renewed permit will also reflect that used oil rather, than ethylene glycol, is now stored in the northern tank. It also appears that SWMU-7 consists of *two* 15,000 gallon tanks. Only one tank (managing used ethylene glycol) was identified in the RFA. The southern tank was not identified in the RFA (see Enclosure A). Update your description.

34. Page 1, SWMU-8: The loading/unloading area for the tank farm is not identified on Figure Part II-Q.

35. Page 2, SWMU-12: If this tank never managed a solid waste, then it need not be considered a SWMU. You should remove this tank and renumber the last few SWMUs (Make similar changes in Part II.Q).

36. Page 3: One spill on July 25, 1990 is documented in the, page 17. This spill occurred inside the warehouse and no release to the environment occurred.

Part II.S: Requirements for Equipment Leaks:

37. Figure 11.1-1 is incomplete. Items 17, 19, 20, 21 and 25 are missing from the figure. Structures in the figure need to be identified. The piping diagram needs to accurately show how all the piping connected to items identified in the table are interconnected.

38. Table 11.2-3: Suggest removing the section on surface impoundments.

39. Page 1, paragraph 1:

1. Figure 2.2-6 does not use the term "tank storage management area". For clarity, use the same nomenclature.
2. Appendix D, rather than Appendix E, should be referenced in the last sentence (There is no Appendix E). This same error is in the last sentence on page 11.

Page 4: Page 4: The first line references your Medley facility.

Page 10, Level 2 Containers should read "...(~~265~~4.1086(d)). Within the paragraph, the reference to 265... should be changed to 264...

Table 11-2-2, last column, bottom row: "!!" should be "11".

Appendix A Site Photographs:

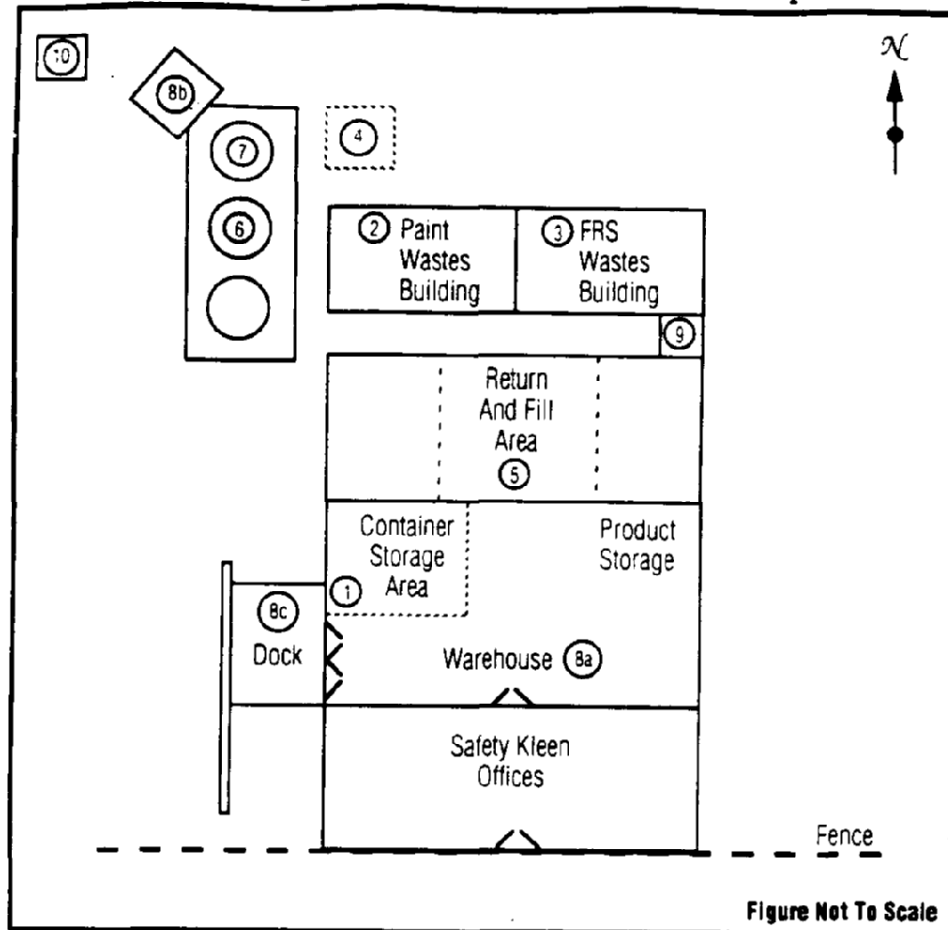
1. The first photograph should indicate it is the east side of the facility facing west.
2. The second photograph should indicate it is the west side of the facility facing east.

Appendix C Tank Integrity Inspection Report:

The inspection report states that the Moormann float had liquid in it and should be replaced. Was this float replaced?

Enclosure A
Safety Kleen
Orange Park, FL
#FLD 980847214

Facility Layout and SWMU Location Map



SWMU Number

SWMU Name

- | | |
|-----|--|
| 1. | Warehouse Container Storage Area |
| 2. | Paint Wastes Building |
| 3. | FRS Wastes Building |
| 4. | Former Restaurant Filters Building |
| 5. | Return and Fill Area |
| | A. Mineral Spirits Dumpsters |
| | B. Dumpsters Satellite Accumulation Area (SAA) |
| | C. Containment and Sumps |
| 6. | Spent Mineral Spirits Tank |
| 7. | Spent Ethylene Glycol Tank |
| 8. | Loading Unloading Areas |
| | A. Inside Warehouse |
| | B. Tank Farm Area |
| | C. Warehouse Dock |
| 9. | Pallet Accumulation Area |
| 10. | BFI Dumpster |

Enclosure B

PART THREE: Checklist

	Yes	No	Comments
1. Facility Description			
a. Are all processes that generate hazardous waste identified?			
b. Is sufficient information provided for each process to confirm that all hazardous wastes are identified?			
c. Have all hazardous waste management units been identified?			
d. Are descriptions of all hazardous waste management units provided?			
e. Have all hazardous and solid wastes been identified for each unit?			
f. Have the methods of waste management (e.g., stabilization) been described for each unit?			
g. Are process design limitations defined for each hazardous waste management unit?			
h. Have operational acceptance limits been established for each hazardous waste management unit?			
i. Are procedures in place to determine whether wastes are outside of their respective acceptance ranges?			
j. Do operational acceptance limits include applicable regulatory restrictions?			
2. Systematic Planning			
a. Does the WAP incorporate a process for systematic planning, such as the Data Quality Objectives (DQO) process?			
b. Do personnel training records (located in the permit application) demonstrate that facility personnel supervising waste sampling and analysis have received appropriate training in systematic planning?			
3. Selecting Waste Parameters			
a. Are parameters for waste analysis identified (and, if applicable, included in the WAP)?			
b. Does the WAP identify a rationale for the selection of each waste analysis parameter?			

	Yes	No	Comments
c. Does the WAP include parameters for the special waste analysis requirements 40 CFR §§264/265.17, 264/265.314, 264/265.341, 264/265.1034 (d), and 266.102(b), if applicable?			
d. Have operational acceptance limits been defined as they related to waste properties and process?			
e. Do operational acceptance limits include regulatory restrictions?			
f. Do waste analysis parameters address applicable operational acceptance limits?			
4. Selecting Sampling Procedures			
a. Has the number of sampling locations been identified?			
b. Are sampling procedures for each waste type identified?			
c. Are descriptions and justifications provided for any modified or non-standard procedures approved by EPA?			
d. Have decontamination procedures for sampling equipment been developed?			
e. Have sampling strategy techniques (e.g., grab, composite) been specified?			
f. Are procedures for sampling multi-phase wastes addressed, if applicable?			
g. Has all sampling equipment been identified?			
h. Have the number and types of sampling containers been specified?			
i. Have sample preservation techniques been specified?			
j. Are sampling quality assurance and quality control procedures been documented?			
k. Are proper packing and shipping procedures documented?			
l. Have procedures for the maintenance of all sampling equipment been documented?			
m. Are the precision and accuracy of all sampling equipment been documented?			
n. Are health and safety procedures for the protection of sampling personnel specified?			
5. Selecting a Laboratory and Laboratory Analytical Methods			
a. Are laboratory analytical methods specified for each waste managed at the facility? If not, is other information (i.e., acceptable knowledge) used to demonstrate waste analysis?			
b. Has a rationale been specified for each analytical method?			
c. Do the selected analytical methods meet all regulatory requirements for the identification of each hazardous			

	Yes	No	Comments
waste (e.g., each hazardous waste characteristic)?			
d. Are descriptions and justifications provided for any modified or non-standard methods, as approved by EPA?			
e. Have chain-of-custody procedures for samples been specified, if necessary?			
f. Does the laboratory have an adequate QA/QC program?			
g. Have QA/QC procedures for each analytical procedure been identified?			
6. Quantifying Data Uncertainty			
a. Does the WAP incorporate a process for quantifying data uncertainty so that laboratory results are capable of supporting the facility's waste management decisions (i.e., is there an appropriate level of certainty in the results)?			
7. Selecting Waste Re-Evaluation Frequencies			
a. Have site-specific criteria for waste re-evaluations been specified?			
b. Is re-evaluation accomplished with adequate frequency?			
c. Are mechanisms in place for re-evaluating the sampling program each time the waste generating processes change?			
d. Do the re-evaluation procedures specify criteria for the acceptance of wastes received from off-site generators?			
e. Do you notify off-site facilities (i.e., TSDFs) of changes in waste characterizations due to process changes and other factors?			
8. Special Procedural Requirements, Where Applicable			
a. Are procedures in place to verify the sources of the information provided from off-site generators or TSDFs?			
b. Have criteria been established for the pre-acceptance procedures of wastes based on information from off-site generators or TSDFs?			
c. Are procedures for waste inspections in place?			
d. Have fingerprint analysis parameters been developed?			
e. Have criteria been established for the acceptance of wastes based on the results of fingerprint analysis?			
f. Is there a methodology for identifying ignitable, incompatible, or reactive wastes?			
g. Are procedures in place to conduct testing to determine whether wastes are incompatible with each hazardous waste management unit on-site?			
h. Have all wastes restricted under the LDRs been identified?			
i. Are procedures in place to ensure that wastes met applicable LDR treatment standards prior to land			

	Yes	No	Comments
disposal?			
9. Discrepancy Policy			
a. Are procedures in place to resolve discrepancies between incoming shipment and its manifest?			
b. Are the procedures in compliance with applicable manifest discrepancy regulations (Part 264/265, Subpart E)?			
c. Are procedures in place to resolve discrepancies between incoming shipment and its waste profile?			
d. Do these procedures include a process for re-characterizing the waste and revising or preparing a new profile when needed?			
10. Rejection Policy			
a. Are procedures in place to reject a waste in accordance with applicable RCRA regulations (Part 264/264, Subpart E)?			
b. Are these procedures coordinated with the discrepancy policy as necessary?			
11. Recordkeeping			
a. Does the WAP clearly identify all of the types of records that will be kept?			
b. Does the WAP indicate the length of time that records will be kept and are these timeframes in compliance with applicable regulations?			
c. Will the facility produce summary-level reports based on its records, to describe its compliance with applicable WAP requirements (e.g., on LDR compliance testing)?			
d. Will the facility's recordkeeping systems produce records to on-site inspectors in a timely and organized fashion?			
12. Corrective Action			
a. Is a corrective action program in place to identify and eliminate the cause(s) of nonconformities and undesirable situations due to deficiencies in current laboratory practice?			
b. Does the WAP describe how deficiencies will be reported and remedies determined?			
c. Does the WAP spell out the timeframes for reporting and resolving problems?			
d. Are responsible personnel identified (e.g., by position)?			