IMAGE QUALITY

AS YOU VIEW THE FOLLOWING DOCUMENT, PLEASE NOTE THAT PORTIONS OF THE ORIGINAL WERE OF POOR QUALITY

SATIS [redacted] BC 7/26

cc hand delivered to SW District 7/28 CAB

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88 JUL 22 PM 2:17

BUREAU OF
WASTE MANAGEMENT

JUL 19 1988

4WD-RCRA

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Lederer, General Manager
Tricil Recovery Services, Inc.
Bartow Municipal Airport
Avenue D. North
Route 3, Box 249
Bartow, Florida 33830-9504

RE: Notice of Violation
EPA I.D. Number: FLD 980 729 610

Dear Mr. Lederer:

On September 22, 1987, Versar, Inc., acting as an agent for the U.S. Environmental Protection Agency (EPA) conducted an inspection of your facility to determine compliance with the applicable regulations of the Land Disposal Restrictions Rule.

Pursuant to Section 3006(g) [42 U.S.C. 6926(g)] of the Hazardous and Solid Waste Amendments of 1984, any new requirements and prohibitions imposed under the Resource Conservation and Recovery Act (RCRA) immediately take effect in authorized states. Therefore, EPA will enforce these requirements and prohibitions in authorized states until the State is granted authorization for these requirements. The EPA wil therefore enforce the Land Disposal Restriction Rule published in the Federal Register on November 7, 1986, and July 8, 1987. Effective on November 8, 1986, hazardous wastes with EPA Codes F001 through F005 are restricted from land disposal. Effective July 8, 1987, certain of the California List wastes are restricted from land disposal.

This Notice of Violation only addresses violations associated with the Land Disposal Restrictions Rule. Noted during the inspection at your facility was a violation of 40 C.F.R. 268.50(a)(2)(i) and a violation of 40 C.F.R. 264.13(a)(1).

Pursuant to 40 C.F.R. 268.50(a)(2)(i), the owner/operator of a storage facility may store restricted wastes solely for purposes of accumulation to facilitate recovery, treatment or disposal of the waste. For restricted wastes that are stored, each container must be clearly marked to identify its contents and the date each container entered storage. 40 C.F.R. 264.13(a)(1) states that before an owner/operator treats, stores, or disposes of any hazardous waste, he must obtain a detailed chemical and physical analysis of a representative sample of the waste, which at a minimum, allows him to store waste in accordance with the requirements of the Land Disposal Restrictions Rule.

Tricil Recovery Services failed to mark each drum of restricted waste in storage to clearly identify its contents and failed to mark the start accumulation date for each drum of restricted waste entering storage. Several drums in the storage area were labeled as non-restricted hazardous waste (D001), although the associated waste analysis indicated that these drums contained restricted hazardous waste solvents (F-solvents). In addition, one drum in storage had its identification label changed from F005 to D001. The analysis for this drum indicated that the proper identification should have been F005.

Tricil Recovery Services must comply with all the requirements of 40 C.F.R. 268.50(a)(2)(i) and 40 C.F.R. 264.13(a)(1) for the storage of hazardous waste solvents (F001 through F005) and California list wastes. If the above requirements are not met pursuant to Section 3008 of RCRA [42 U.S.C. 6928], a penalty of up to $25,000 per day may be assessed.

On January 29, 1988, the Florida Department of Environmental Regulation conducted an inspection of your facility. At that time, no violations of the Land Disposal Restrictions Rule were found. However, to assure the Agency of future compliance with the above, please provide a written plan of action to illustrate the steps to be taken in the future to comply with this requirement. This plan shall be provided to EPA within thirty (30) days of receipt of this letter and addressed to:

Mr. James H. Scarbrough, P.E.
Chief, RCRA Branch
Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

The inspection reports for your facility and a copy of the applicable land disposal regulations have been enclosed for your reference.

If you have any questions, please do not hesitate to contact Alan Farmer of my staff at (404) 347-7603.

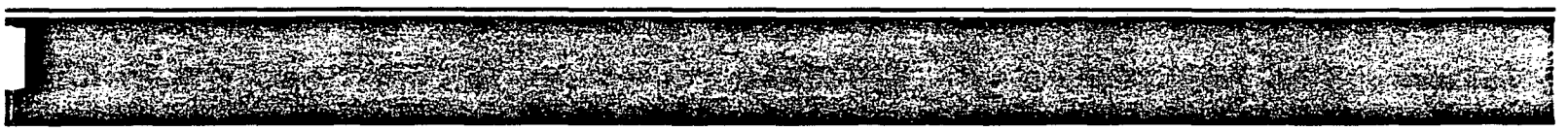
Sincerely yours,

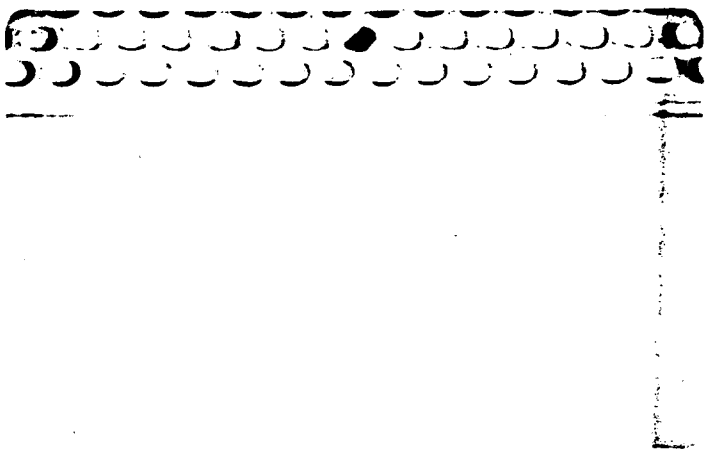
Patrick M. Tobin, Director
Waste Management Division

Enclosure

cc: Mr. Barry Swihart, Chief
Bureau of Waste Planning and
Regulation
Florida Department of Environmental
Regulation (w/enclosure)

Mr. Richard D. Garrity
District Manager
Southwest District
Florida Department of Environmental
Regulation (w/enclosure)





TECHNICAL ENFORCEMENT SUPPORT AT HAZARDOUS WASTE SITES

U.S. EPA CONTRACT NO. 68-01-7331

CDM Federal Programs Corporation

FINAL REPORT

RCRA COMPLIANCE EVALUATION INSPECTIONS
LAND BAN RESTRICTIONS

TRICIL RECOVERY SYSTEMS, INC.

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No.	: 618
EPA Region	: IV
Site No.	: FLD980602734
Contract No.	: 68-01-7331
CDM Federal Programs Corporation (CDM FPC) Document No.	: T618-R04-FR-BVEF-2
Prepared By	: Versar Inc.
Work Assignment Project Manager	: Raymond Boyd
Telephone Number	: (404) 873-2137
Primary Contact	: Doylel Brittain
Telephone Number	: (404) 347-7603
Date Prepared	: April 13, 1988

TABLE OF CONTENTS

ATTACHMENTS

1.0 INSPECTION APPROACH

Versar Inc. conducted a RCRA F-Solvent Land Restriction Compliance Evaluation Inspection on the 22nd of September, 1987 at the Tricil Recovery Services, Inc. (Tricil) site in Bartow, Florida. Ms. Lori Stowers and Ms. Sandra Glenn, of Versar Inc., conducted the inspection. Ms. Kim McClain and Mr. Richard A. Stross, of the Florida Department of Environmental Regulation (FDER) Regional Office in Tampa, Florida and Mr. Michael Redig from FDER in Tallahassee accompanied Versar personnel. During the facility visit, the Versar inspection team met with Mr. Ken Given, Mr. Lary W. Byers, and Ms. Linda Spannaus of Tricil.

Prior to performing the on-site inspection, the Versar inspection team visited the FDER Regional office in Tampa to collect the background information on the facility needed to complete the pre-inspection portion of the F-Solvent Land Restriction Generator Checklist. This background information was obtained by reviewing previous inspection reports and permit applications for the facility. The on-site inspection began with a review of the facility's documents such as manifests, analyses, and operating records. In addition, the RCRA Land Restriction F-Solvent Generator Checklist (Attachment 1), RCRA F-Solvent Land Restriction Treatment, Storage, and Disposal Facility Checklist (Attachment 2) and California List Waste Land Ban Inspection Checklist (Attachment 3) were completed during the inspection. A tour of the facility and hazardous waste storage areas followed.

2.0 FACILITY DESCRIPTION

Tricil Recovery Services is located in Bartow, Florida. The company's mailing address is:

Tricil Recovery Services, Inc.
Rt. 3 Box 235
Bartow, Florida 33830

The facility contact is Mr. Ken Given. Mr. Given can be reached at (813) 533-6111. The EPA identification number for Tricil is FLD980602734.

Tricil Recovery Services, formerly International Solvent Recovery (ISR), began its operations on March 11, 1987. The facility currently holds an operating permit as a hazardous waste storage facility and is also a hazardous waste generator. The permit was transferred from ISR to Tricil in July of 1986. Tricil's operations consist of recycling contaminated solvents that it receives from local industries. Solvents are delivered to Tricil in 55-gallon drums and in bulk tanker trucks. The drums are placed into a storage area, and as sufficient quantities are accumulated, the waste is pumped into the storage tanks. Bulk shipments are transferred directly to one of the facility's ten above ground storage tanks. Each tank has a capacity of approximately 6,000 gallons of liquid waste.

The facility's treatment process involves the use of a vacuum still and a thin-film evaporator, for major particulate removal. A fractionation column is used for additional removal, if necessary. Approximately 360,000 gallons of sludge from recycling is generated by Tricil annually. This sludge is placed into 55-gallon containers and shipped off-site to Oldover Corporation, located in Green Cove Springs, Florida for use as hazardous waste fuel.

3.0 INSPECTION OBSERVATIONS

The inspection began with a review of the facility's manifests, analyses, operating records, and laboratory records. The manifests and laboratory records revealed that Tricil generates F003 and F005 waste. No California List waste are generated or handled by Tricil. Analyses are done by their on-site laboratory. Unless a customer's process changes, only an initial analysis is done. The sludge waste that is generated is sent to Oldover (see Attachment 1, page 3) for treatment. All the necessary information (i.e. EPA waste numbers, treatment standards,

manifest numbers, and initial waste analysis) is provided by Tricil. Tricil staff noted that no verification is conducted on the treatment residues (shipped to Oldover) to determine if the wastes are below treatment standards, but that they are assumed to be above standards. Tricil's waste analysis plan was revised to cover 40 CFR 268 requirements.

The laboratory records revealed that an analysis is conducted at the on-site laboratory for every waste type received from area generators. During the inspection, Mr. Byers added that any manifest discrepancies are corrected immediately.

The inspection ended with a tour of the facility's storage area and a visual inspection of drums. The drums in storage are adequately tracked from arrival to department to ensure they have not been stored for more than one year. The storage area contained a substantial number of drums, therefore approximately 50% of the drums were visually checked. It was discovered by this visual inspection that several drums from the American Lacquer and Solvent Co. were labeled as paint thinner, D001. According to the laboratory analysis on this waste, it contains 10% toluene and should therefore be labeled as an F-solvent. There was also one drum from Betram Yacht that had its label changed from F005 to D001. The analysis for this waste indicated that it contains 52% toluene and should therefore be labeled as an F-solvent. It was also noticed that one drum was leaking.

4.0 FINDINGS

Citation	Description
40 CFR 264.13	EPA waste codes were listed incorrectly on the drums mentioned in section 3.0.

No other problems were encountered. All records seemed to be in fairly good order.

ATTACHMENT 1

RCRA LAND RESTRICTION F-SOLVENT GENERATOR CHECKLIST

Inspector: Lori Stowers, Sandra Glen
Address: Versar/Atlanta
Telephone No: (404)873-2137

DRAFT
RCRA LAND RESTRICTION F-SOLVENT
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

Trici Recovery Services, Inc. Ave. D. North Bartow Airport
A. Handler Name B. Street (or other identifier)

Bartow Florida 33830 Polk
C. City D. State E. Zip Code F. County Name

Treatment of A.W. from industry
G. Nature of Business; Identification of Operations

FLD 980602734
H. EPA ID #

Ken Given
I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following vastes?

a. F001 ___Yes ✓No
b. F002 ___Yes ✓No
c. F003 ✓Yes ___No

If an F003 vastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous vaste, does the resultant mixture exhibit the ignitability characteristic? N/A ___Yes ___No

d. F004 ___Yes ✓No
e. F005 ✓Yes ___No

2. Source of the above: Form 8700-12 ___; Part A ___; Part B___; other (specify) manifests

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent vastes, if such vastes vere not identified by the facility previously. If you are concerned that F-solvent vastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below: _____

ndler Name: Tricil
Number:
Inspector: Lori Stowers, S. Glen
Date: 9/22/87

B. BDAT Treatability Group - Treatment Standards Identification — Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

✓ Yes ___ No

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes ✓ Yes ___ No

b. TCLP ___ Yes ✓ No

c. Other (specify)_____

If knowledge, note how this is adequate:
Process Knowledge

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency:_____

Note any problems:_____

d. Were wastes tested using TCLP when a process or wastestream changed? N/A

___ Yes ___ No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ___ No
___ Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3]

___ Yes ✓ No

D. Management

1. Onsite management

a. Were F-solvent wastes managed onsite?

✓ Yes ___ No

If yes, answer 1(b) and (c); if no, answer 2.

Handler Name: Trical
ID Number:
Inspector: Lori Stowers, S. Gle
Date: 9/22/87

Comments

b. For vastes that exceed treatment standards, vas treatment, storage, and/or disposal conducted?
✓ Yes ___ No

If yes, TSDF Checklist must be completed.

c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
✓ Yes ___ No

2. Offsite Management

a. If F-solvent vastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA vaste number? ✓ Yes ___ No

(ii) Applicable treatment standard? ✓ Yes ___ No

(iii) Manifest number? ✓ Yes ___ No

(iv) Vaste analysis data, if available? Data not available
___ Yes ✓ No

Identify offsite treatment facilities Oldover Country Rd. 209 B, Green Cove Springs, Fla. 32043

b. If F-solvent vastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]: N/A

(i) EPA Hazardous vaste number? ___ Yes ___ No

(ii) Applicable treatment standard? ___ Yes ___ No

(iii) Manifest number? ___ Yes ___ No

(iv) Vaste analysis data, if available?
___ Yes ___ No

(v) Certification that vaste meets treatment standards? ___ Yes ___ No

Identify land disposal facilities receiving the BDAT certified vastes _____

Handler Name: Tricil
D Number:
Inspector: L. Stowers, S. Gee
Date: 9/22/87

c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]? N/A
__Yes __No

Comments

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?
✓ Yes __No

If yes, was facility operating as a TSD under interim status or final permit? ✓ Yes __No

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ✓ Yes __No

If yes, list type of treatment unit and processes
DISTILLATION UNIT ; STILL BOTTOMS
A PROPERLY IDENTIFIED AND DISPOSED
OF AT OUTSIDE.

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

APPENDIX A

Comments

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the folloving F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of bein, used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	___No
trichloroethylene	___Yes	___No
methylene chloride	___Yes	___No
1,1,1-trichloroethane	___Yes	___No
carbon tetrachloride	___Yes	___No
chlorinated fluorocarbons	___Yes	___No

2. Does the handler generate any of the folloving F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	___No
trichloroethylene	___Yes	___No
methylene chloride	___Yes	___No
1,1,1-trichloroethane	___Yes	___No
chlorobenzene	___Yes	___No
trichlorofluoromethane	___Yes	___No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	___No
ortho-dichlorobenzene	___Yes	___No

3. Does the handler generate any of the folloving F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	___Yes	___No
acetone	___Yes	___No
ethyl acetate	___Yes	___No
ethyl benzene	___Yes	___No
ethyl ether	___Yes	___No
methyl isobutyl ketone	___Yes	___No
n-butyl alcohol	___Yes	___No
cyclohexanone	___Yes	___No
methanol	___Yes	___No

If the F003 vastestream has been mixed with a solid vaste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ___No

Handler Name: _____
ID N er: _____
Inspector: _____
Date: _____

Comments

4. Does the handler generate any of the folloving F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	___No
nitrobenzene	___Yes	___No

5. Does the handler generate any of the folloving F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	___Yes	___No
methyl ethyl ketone	___Yes	___No
carbon disulfide	___Yes	___No
isobutanol	___Yes	___No
pyridine	___Yes	___No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The folloving questions will be helpful in confirming this determination.

(a) Chemical carriers? ___Yes ___No

If the ansver is yes, list the constituents.

_____

_____

(b) Degreasing/cleaning? ___Yes ___No

If the ansver is yes, list the constituents.

_____

_____

(c) Diluents? ___Yes ___No

If the ansver is yes, list the constituents.

_____

_____

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

(d) Extractants? ___Yes ___No Comments

If the ansver is yes, list the constituents.

_____

_____

(e) Fabric scouring? __Yes ___No

If the ansver is yes, list the constituents.

_____

_____

(f) Reaction and synthesis media? ___Yes ___No

If the ansver is yes, list the constituents.

_____

_____

If questions 1-6 led the inspector to believe that the vaste may be an F-solvent, ansver question 7.

7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed. ___Yes ___No

8. If the vaste is a mixture of constituents as determined in questions 1-7, ansver this to determine whether it is a "solvent mixture" covered by the listings.

   If the vastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

   5% methylene chloride
   2% trichloroethylene
   25% 1,1,1-trichloroethane
   68% mineral spirits
   100%

   If the vastestream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed vaste.

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

With respect to the F003 solvent vastes, if, before use, the vastestream is mixed and contains only F003 constituents, it is a listed vaste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the vastestream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed vaste.
For example:

50%	xylene	F003
12%	TCE	F001
38%	mineral spirits	
100%		

If in light of the above, the handler appears to be generating F001-f005 hazardous vastes, refer this facility to the enforcement official for follov-up actions verifying the use of solvents at the facility.

ATTACHMENT 2

RCRA F-SOLVENT LAND RESTRICTION TSDF CHECKLIST

Facility Name: Trical
ID Number:
Inspector: L. Stowers, S. Glen
Date: 9/22/87

DRAFT
RCRA F-SOLVENT LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

Trical Recovery Services, Inc. Ave. D North Bartow Airport
A. Facility Name B. Street (or other identifi

Bartow Florida 33830 Polk
C. City D. State E. Zip Code F. County Na

Treatment of H.W. from industry
G. Nature of business; identification of operations

FLD980602734
H. EPA ID #

Ken Given
I. Facility Contact (Name and Phone Number)

II.A. For onsite facilities, complete the generator checklist — Comments

B. General Facility Standards

1. Was waste analysis plan revised to cover Part 268 requirements [264.13 or 265.13]? ✓Yes ___No

2. Did facility obtain representative chemical and physical analysis of vastes and residues [264.13(a)/265.13(a)]? ✓Yes ___No

a. Did testing include analyses for all F001-F005 constituents? ✓Yes ___No

b. Were analyses performed using TCLP? ___Yes ✓No

c. Were analyses conducted onsite or offsite (identify offsite lab)? ✓On ___Off:

d. Describe frequency of sampling every drum is sample upon arrival

e. Describe procedures used to identify manifest discrepancies manifests visually checked as they arrive. Errors corrected immediately

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]? ✓Yes ___No

F lity Name: Trici
I. Number:
Inspector: L. Stowers, S. Glenn
Date: 9/22/87

C. Storage [268.50]

Comments

1. a. Were restricted wastes exceeding treatment standards stored? ✓Yes __No

If no, go to "D."

b. Are all containers clearly marked to identify content and date(s) entering storage? __Yes ✓No — Some drums don't have EPA waste numbers or start accumulation dates.

c. Do operating records track the location, quantity and dates that waste exceeding treatment standards entered and were removed from storage? ✓Yes __No

d. Do operating records agree with container labeling? ✓Yes __No

e. Is waste exceeding treatment standards stored for less than 1 year? ✓Yes __No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? __Yes ✓No

If yes, state how: _____

f. Were tanks emptied at least once per year, and do operating records show that volume of waste removed from tanks annually at least equals tank volume? ✓Yes __No

g. Was/is waste exceeding treatment standards stored for more than one year? __Yes ✓No

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

_____

h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? __Yes ✓No

D. Treatment in Surface Impoundments [268.4]

1. Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment? __Yes __No N/A

If no, go to E.

Facility Name: Tricil
ID Number:
Inspector: L. Stowers, S. Glenn
Date: 9/23/87

Comments

2. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency? ___Yes ___No

N/A

3. Have the minimum technology requirements been met? ___Yes ___No

   a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s)? ___Yes ___No

4. Have the Subpart F ground-water monitoring requirements been met? ___Yes ___No

5. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record [264.13/265.13] and [264.73/265.73]? ___Yes ___No

6. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified in [268.41]? ___Yes ___No

7. Provide the frequency of analyses conducted on treatment residues: _____

8. Does the operating record adequately document the results of waste analyses performed in accordance with [268.41] and [264.73/265.73] ___Yes ___No

9. Have the hazardous waste residues that exceed the treatment standards [268.41] been removed adequately and on an annual basis? ___Yes ___No

   a. If answer is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? ___Yes ___No

10. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ___Yes ___No

11. When removed, were solvent wastes managed subsequently in another surface impoundment? ___Yes ___No

Facility Name: Trial
ID Number:
Inspector: L. Stowers, S. Glenn
Date: 9/22/87

12. When removed, were vastes treated prior to disposal?
__Yes __No

Comments

N/A

a. If yes, are vaste residues treated on or offsite?
__Onsite __Offsite

b. Identify management method _____

E. Treatment

1. Did the facility operate treatment facilities for F-solvent vaste (not including surface impoundments)?
__Yes ✓No

~~This process is exempt~~

Operating a RCRA exempt recycling process (distillation

If no, go to "F."

2. Describe the treatment processes for F-solvent vastes.

N/A

3. Does the facility, in accordance with an acceptable vaste analysis plan, verify that the residue extract from all treatment processes for the F-solvent vastes are less than treatment standards [268.7(b)(2)]?
__Yes __No

4. Describe frequency of testing of treatment residuals.

5. Was dilution used as a substitute for treatment [268.3]?
__Yes __No

6. Are certifications and results of vaste analyses kept in the operating record [264.73(b)(3)/265.73(b)(3)] and [268.7(c)]?
__Yes __No

7. Are notice with vaste number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of vaste or treatment residual that meets the treatment standard stating that vaste has been treated to treatment performance standards [268.7(b)]?
__Yes __No

8. Are certifications submitted for each shipment [268.7(b)(2)(i)]?
__Yes __No

Facility Name: Trical
ID Number:
Inspector: Stevens, Glenn
Date: 9/22/87

F. Land Disposal

Comments

1. Were F-solvent vastes placed in land disposal units (landfills, surface impoundments [for this question, do not include if in "D"] vaste piles, vells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker? ___Yes ___No

N/A

2. Did facility have the notice and certification from generators/treaters in its operating record [268.7(c); 268.7(a),(b)]? ___Yes ___No

3. Did the facility obtain waste analysis data through testing of the vaste to determine that the vastes are in compliance with the applicable treatment standards [268.7(c)]? ___Yes ___No

   If yes, at what frequency?_____

4. Were F-solvent vastes exceeding the treatment standards placed in land disposal units excluding national capacity variances [268.30(a)]? ___Yes ___No

   If yes, did facility have an approved vaiver based on no migration petition [268.6] or approved case-by-case capacity extension [268.5] or treatment standard variance [268.44]? ___Yes ___No

5. Were F-solvent vastes subject to a national or case-by-case capacity variance/extension disposed? ___Yes ___No

   a. If yes, vere these vastes disposed of in a facility that has a new, replacement, or laterally expanded landfill or impoundment? ___Yes ___No

      If (a) is yes, have the minimum technology requirements been met for all such units at the facility [268.5(h)(2)] and [268.30(b)]? ___Yes ___No

6. Were adequate records of disposal maintained? ___Yes ___No

7. If vastes subject to a nationvide variance [268.30], case-by-case extensions [268.5], or no migration petitions [268.6] vere disposed, does facility have notices [268.7(a)(3)] and records of disposal? ___Yes ___No

8. What is the volume of F-solvent vaste disposed to date by vaste?_____

_____

Facility Name: IRCI
ID Number:
Inspector: L. Stevens, S. Glenn
Date: 9/22/87

9. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports [268.5]?

___Yes ___No N/A

Comments

ATTACHMENT 3

CALIFORNIA LIST WASTE LAND BAN INSPECTION CHECKLIST

LOU MANCUSO
POLL DAVE, KEIT.
PREPARE RESPONS
BY 9/3. AA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 14 1987

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: California List Inspection Checklist

FROM: Terry Grogan for
Elaine Stanley, Acting Director
RCRA Enforcement Division

TO: RCRA Enforcement Section Chiefs
Regions I-X

Attached you will find a copy of the Draft Inspection Checklist covering the July 8, 1987 California List Rule, along with a brief summary of the regulation. An important point to remember is the fact that the major components of the regulatory framework for implementing the land disposal restrictions set by the November 7, 1986 Solvents and Dioxins Rule are applicable to the California list wastes unless otherwise specified. Therefore, the attacned California List Inspection Checklist is intended for use with the Solvents and Dioxins Inspection Checklist, which was sent to you earlier. To aid in implementation, the California List Enforcement Strategy will be sent to you as soon as final.

Please review and forward your comments by August 31. If you have any questions, you may contact Victor Hays of my staff at FTS 475-9328.

Attachment

cc: Richard Ida/NEIC
Bruce Weddle
Sylvia Lowrance

Tricil

California List Waste

1) Does the handler generate the following wastes?

   a. Liquid hazardous wastes having a PH less than or equal to two [2.0]? ____ Y ✓ N

   b. Liquid hazardous wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to
   50 ppm? ____ Y ✓ N
   500 ppm? ____ Y ✓ N

   c. Liquid hazardous wastes that are primarily water and contain halogenated organic compounds (HOCs) in total concentration greater than or equal to 1000 mg/l and less than 10,000 mg/l HOCs? ____ Y ✓ N

2) a. Is the Paint Filter Liquids Test (PFLT method 9095) performed as described by SW-846 to determine whether waste is in liquid form? ____ Y ____ N N/A

   b. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a) 265.13(a)]? ✓ Y ____ N

3) If waste was determined to be in liquid state according to PFLT, was waste solidified using an absorbent? N/A
   ____ Y ____ N

4) What type absorbent was used? _____

5) What type of waste was absorbent added to (refer to question 1)? (Check where applicable)

   a. Liquid hazardous waste having a PH less than or equal to 2 ____
   b. Liquid hazardous waste containing PCB in concentrations greater than 50 ppm ____; greater than 500 ppm ____
   c. Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l ____

6) Did handler determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether waste has a PH less than or equal to two [2.0] based on:

   a. Knowledge of wastes ____ Y ____ N
   b. Testing ____ Y ____ N
   List method _____

   If knowledge, note how this is adequate: _____

7) a. Did handler determine if concentration levels* in PFLT extract exceed cyanide & metals treatment standards?

____ Y ____ N

b. List test method used. _____ N/A

c. List constituent and concentration level which exceeded prohibition levels. _____

_____

8) Did generator treat waste on-site or send off-site (Identify off-site facility)? _____

9) If waste was determined to be restricted from land disposal (i.e., liquid, exceeding concentration levels and/or PH less than 2.0) did handler provide treatment facility:

(i)	EPA waste number?	____ Y	____ N
(ii)	Specified treatment standard?	____ Y	____ N
(iii)	Manifest number?	____ Y	____ N
(iv)	Waste analysis data, if available?	____ Y	____ N

10) Did generator/treater dispose of waste on-site or send off-site? _____

Identify off-site disposal facility _____

11) If waste was determined not restricted from land disposal, did handler provide disposal facility with:

(i)	EPA hazardous waste number?	____ Y	____ N
(ii)	Manifest number?	____ Y	____ N
(iii)	Waste Analysis Data, if available?	____ Y	____ N
(iv)	Specified treatment standard?	____ Y	____ N
(v)	Certification that waste passed PFLT (non-liquid), or does not exceed specified prohibition levels?	____ Y	____ N

12) Are restricted wastes containing PCBs (i.e., concentration greater than or equal to 50 ppm) stored greater than 1 yr?

____ Y ____ N

13) Does facility handle any of the following waste:

a.

(i) Waste containing HOC greater than or equal to 1000 mg/kg (non-liquid hazardous waste)

____ Y ____ N

(ii) Waste containing HOC greater than or equal to 10,000 mg/l (liquid hazardous waste)

____ Y ____ N

(iii) Waste containing HOC greater than 1000 mg/l and less than 10,000 mg/l and are not dilute HOC waste water?

____ Y ____ N

* Cyanide and metals concentration levels not yet codified in Regulation. Statutory levels under 3004(d)(2) should be used.

If yes, answer 13(b) and (c), if no answer 14.

N/A

13) b. Is any waste listed in 13(a) disposed of in a land fill or surface impoundment? ____ Y ____ N

If yes, continue, if no answer 14.

c. Is facility in compliance with section 268.5(h)(2) [New, replacement, or laterally expanded units must meet minimum technology requirements] and section 264 & section 265 Subpart F ground-water monitoring requirements?

____ Y ____ N

14) If facility handles any liquid hazardous waste containing PCB complete the following section:

a. List concentration levels of PCB in waste stream(s) _____ (ppm)

b. Describe method of treatment/disposal of wastes(s) listed in section (a) and identify facility receiving this waste _____

_____

_____

_____

c. Does facility perform any type of mixing of PCB containing liquid hazardous waste with same or other types of wastes or liquids? ____ Y ____ N

d. If yes, state reason for mixing: _____

_____

_____

_____

FACT SHEET

Land Disposal Restrictions Final Rule: California List

This rule promulgates treatment standards and corresponding effective dates for the California list wastes containing polychlorinated biphenyls (PCBs) and halogenated organic compounds HOCs, and codifies the statutory prohibition levels for certain corrosive wastes. This rule also establishes methods for determining compliance with the regulatory requirements and modifies portions of the land disposal restrictions framework which was promulgated on November 7, 1986 (51 FR 40572).

The California list consists of liquid hazardous wastes containing certain metals, free cyanides, polychlorinated biphenyls (PCBs), corrosives with a pH of less than or equal to two (2.0), and liquid and non-liquid wastes containing halogenated organic compounds (HOCs) as described below:

(A) Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater that or equal to 1,000 mg/l.

(B) Liquid hazardous waste, including free liquids associated with any solid or sludge, containing the following metals (or elements) or compounds of these metals (or elements) at concentrations greater that or equal to those specified below:

(i) arsenic and/or compounds (as As) 500 mg/l;
(ii) cadmium and/or compounds (as Cd) 100 mg/l;
(iii) chromium (VI and/or compounds (as Cr VI)) 500 mg/l;
(iv) lead and/or compounds (as Pb) 500 mg/l;
(v) mercury and/or compounds (as Hg) 20 mg/l;
(vi) nickel and/or compounds (as Ni) 134 mg/l;
(vii) selenium and/or compounds (as Se) 100 mg/l; and
(viii) thallium and/or compounds (as Tl) 130 mg/l;

(C) Liquid hazardous waste having a pH less that or equal to two (2.0).

(D) Liquid hazardous wastes containing polychlorinated biphenyls at concentrations greater that or equal to 50 ppm.

(E) Hazardous wastes containing halogenated organic compounds in total concentration greater that or equal to 1,000 mg/kg.

Cyanides and Metals

On December 11, 1986, the Agency proposed to codify the applicable statutory level for cyanides and metals. Several commenters indicated that the Agency should lower the statutory levels for these constituents. Therefore, the Agency is publishing a Notice of Data Availability to seek comment on new data to support lowering the statutory level. The July 1987 final rule addresses only corrosives, PCBs, and HOCs.

HOCs

The proposed rule limited the HOCs of concern to those listed or identified as hazardous under 40 CFR Part 261, or listed as a hazardous constituent under Appendix VIII to Part 261. The final rule limits the HOCs of concern to those on a new Appendix III, HOCs for which analytical methods are available. The final rule specifies that non-liquid hazardous wastes containing HOCs in total concentrations greater than or equal to 1,000 mg/kg and liquid hazardous wastes containing HOCs in total concentrations greater than or equal to 10,000 mg/l must be incinerated in accordance with existing RCRA regulations. The final rule establishes a 2-year natinal capacity extension for all California list HOCs except HOC-water mixtures containing less than 10,000 mg/l HOCs.

Corrosives

The proposed rule would have codified the statutory standard and specified a treatment standard (neutralization to a pH greater that two (2.0)). The final rule codifies the statutory standard. ≤ 2 However, no treatment standard is specified for these wastes. The Agency is not granting an extension of the effective date for these wastes.

Polychlorinated biphenyls (PCBs)

On December 11, 1986, the Agency proposed to regulate liquid hazardous wastes containing PCBs at greater than 50 ppm in accordance with the TSCA regulations. However, incineration or burning in high eff. boilers would be required for PCBs between 50-500 ppm. The Agency is promulgating the rule essentially as proposed, except for the 2-year national capacity extension. Data indicate that there is available capacity for PCBs, except for those generated from CERCLA response action. Therefore, the Agency is promulgating a national capacity extension only for CERLA wastes. The period of the variance will extend for 16 months at which time we expect capacity to be available for these wastes.

CDM Federal Programs Corporation

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