

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

To: *file*
To: _____
To: _____
To: _____

NORTHEAST DISTRICT - JACKSONVILLE

*TO: Don Trussell
Hazardous Waste Section, Tallahassee

THROUGH: Ashwin B. Patel, Hazardous Waste Supervisor *ABP*
Vicky G. Valade, *W* Environmental Supervisor
Hazardous Waste Section

FROM: Pamela Fellabaum, Environmental Specialist *PF*
Hazardous Waste Section

DATE: October 20, 1992

SUBJECT: Safety Kleen Corporation
Hazardous Waste Inspection of October 13, 1992
Clay County - FLD 980 847 214

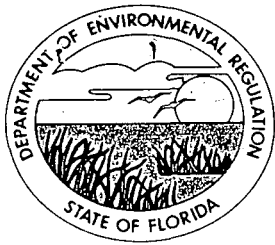
Attached is subject inspection report.

* Land Ban

PF:ps

Attachments

DOCKET # 92-11



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 6, 1992

Mr. Russ Giambrone, Branch Manager
Safety Kleen Corporation
161 Industrial Loop South
Orange Park, Florida 32073

Dear Mr. Giambrone::

Safety Kleen Corporation
Hazardous Waste Inspection of October 13, 1992
Clay County - FLD 980 847 214

Enclosed is a copy of the report documenting the
October 13, 1992, Hazardous Waste Inspection conducted by this
office.

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

Sincerely,

Pamela Fellabaum
Environmental Specialist
Hazardous Waste Section

JW
PF:ps

Enclosures



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

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HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT ☐ COMPLAINT ☒ ROUTINE ☐ FOLLOW-UP ☐ PERMITTING

FACILITY NAME Safety Kleen Corporation DER/EPA ID FLD 980 847 214

STREET ADDRESS 161 Industrial Loop South, Orange Park, Florida 32073

MAILING ADDRESS Same

COUNTY Clay PHONE (904) 264-2607 DATE 10/13/92 TIME 10:00 AM

TYPE OF FACILITY:

Generator Status

☐ Conditionally Exempt(<100 kg/mo)

☐ SQG (100-1000 kg/mo)

☒ Generator(>1000 kg/mo)

☐ Non-Handler

Storage

☒ Container

☒ Tank

☐ Waste Pile

☐ Surface Impoundment

Treatment

☐ Tank

☐ Land Treatment

☐ Thermal

☐ Chem/Phys/Bio.

☐ Incinerator

☐ Surface Impoundment

Transporter

☒ Transporter

☒ Transfer Facility

Disposal

☐ Landfill

☐ Surface Impoundment

☐ Waste Pile

2. Applicable Regulations:

☐ 40 CFR 261.5 ☒ 40 CFR 262 ☒ 40 CFR 263 ☒ 40 CFR 264 ☐ 40 CFR 265

☐ 40 CFR 266 ☒ 40 CFR 268

3. Responsible Official: Russ Giambrone, Branch Manager

4. Survey Participants & Principal Inspector: Russ Giambrone, SK
Pamela Fellabaum, FDER
Timothy McKelvey, FDER

5. Facility UTM: 17/431880/3338053

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: H010-119940 Date Issued: 7/7/87 Exp. Date: 7/6/92

8. Pre-arranged Inspection: ☒ Yes ☐ No

Safety Kleen Corporation
Hazardous Waste Inspection of
October 13, 1992

PROCESS DESCRIPTION:

Safety Kleen is a nationwide corporation that distributes mineral spirits, immersion cleaner, perchloroethylene, and lacquer thinner to its various customers. Permitted hazardous waste units include a storage tank and a container storage area. The facility submitted a Permit Renewal Application that is currently under Department review.

Mineral spirits is used as a parts washer solvent. When the material becomes spent, it is picked up by Safety Kleen and replaced with new product. The waste solvent is transported from the customer back to Safety Kleen and deposited into one of the two automatic barrel washers. The solid material from the drums is retained in the hoppers while the spent mineral spirits (D001) is pumped into a 15,000 gallon above ground tank. Solid material is placed into drums and placed in the container storage area.

The following drums were observed in the permitted container storage area:

1. Four 16-gallon drums of F002 perchloroethylene filters.
2. Four 15-gallon drums of F002 perchloroethylene filters.
3. Two 16-gallon drums of F002 perchloroethylene sludge.
4. Eight 16-gallon drums of D006/D007/D008/D018/D021/D027/D039/D040 immersion cleaner.
5. Six 16-gallon drums of D001 barrel washer sludge. The facility generates about eight such drums per week from the barrel cleaning operation.
6. Fourteen 16-gallon drums of used oil filters. The filters will be sent for recycling.
7. One drum of D001 FRS Trash.

All of the drums were properly labeled and dated. The permitted container storage area has been given another coat of sealant.

The hazardous waste storage tank contains waste mineral spirits from the barrel washers' operation. The tank was properly labeled, and the tank alarms were in proper working order.

A 15,000 gallon above ground storage tank is located adjacent to the permitted hazardous waste storage tank. The tank is used to store spent ethylene glycol anti-freeze mixtures, prior to transportation to the Safety Kleen recycling center in Virginia. The tank is not currently permitted by the State of Florida and Safety Kleen submitted a revised permit application to EPA for the storage tank, a TC newly regulated unit.

Safety Kleen Corporation
Hazardous Waste Inspection of
October 13, 1992
Page Two

Safety Kleen also distributes lacquer thinner containing toluene, xylene, Methyl Ethyl Ketone (MEK), and acetone. Waste lacquer thinner from customers is stored in the two small buildings behind the main facility building. Both of these small buildings are operated as transfer facilities.

One of the buildings contained the following wastes:

1. Two 16-gallon drums of D001/D006/D007/D008/F003/F005 waste paint/lacquer thinner dated October 8, 1992.
2. Two 16-gallon drums of D006/D007/F005 waste paint/lacquer thinner dated October 8, 1992.
3. Three 5-gallon containers of D001/D006/D007/D008/F003/F005 waste paint/lacquer thinner dated October 7, October 8 and October 9, 1992.

The other building contained the following wastes:

1. One 85-gallon overpack drum of D001 waste dated October 9, 1992.
2. One 55-gallon drum of D001 waste dated October 6, 1992.
3. One 55-gallon drum of F005 waste dated October 9, 1992.
4. One 55-gallon drum of D001 waste dated October 9, 1992.

All containers were labeled and dated. Adequate aisle space was provided between all of the containers of waste in both transfer facility buildings.

A review of the facility's operating records found them to be in order. Adequate Land Ban documents accompanied each manifest. No violations were noted at the time of the inspection.

Specific Conditions

Yes No

19. Are only those wastes stated in the waste analysis plan being stored at the facility?

- immersion cleaner (F002/F004)
- mineral spirits sludge (D001 and possibly D006 and/or D008)
- perchloroethylene (F002)

X
↓
V

20. Has the facility followed the procedures in the waste analysis plan?

- customers' process reviewed?
- contents of drums verified when serviced?
- drums kept closed until they reach the recycle center?

X
↓
V

(recycle centers conduct waste analyses)

21. Does the facility comply with the security provisions in 264.14(b)(2) and (c)?

- fence and gates?
- signs with the legend "Danger Unauthorized Personnel - Keep Out"?

X
X

22. a. Are fire extinguishers inspected weekly by the permittee and annually by a fire service supplier?

X

b. Are the eye wash stand, first aid kit, spill control and personnel protective equipment inspected weekly?

X

23. a. Are personnel trained within six months of employment?

X

b. Has training been documented?

↓

c. Is training reviewed annually?

↓

24. a. Are "No Smoking" signs conspicuously placed wherever there is a hazard from ignitable waste?

X

- | | | <u>Yes</u> | <u>No</u> |
|-----|---|------------|-------------|
| 24. | b. Are containers holding ignitable wastes at least 50' from the property line? | <u>X</u> | <u> </u> |
| 25. | a. Does the facility maintain the following equipment listed in the contingency plan? | <u>X</u> | |

EXHIBIT I.E.2-10
EMERGENCY RESPONSE EQUIPMENT

<u>Description</u>	<u>Type/Capacity</u>	<u>Location</u> (Shown in Exhibit I.D.5-2)	<u>Quantities</u>
Fire Extinguisher	ABC (10 lb.)	Warehouse	5
Eyewash	Fountain	Warehouse	1
First Aid		Warehouse	1
Telephones	Standard	Warehouse	1
Telephones	Standard	Office	4
Gloves	Rubber	Emergency Equip. Area	Min. 1
Boots (optional)	Rubber	Emergency Equip. Area	Min. 1
Protective Clothing	Apron	Emergency Equip. Area	1/Employee
Eye Protection	Goggles/Safety Glasses	Emergency Equip. Area	Min. 1
Sorbent Material	Oil Absorbing	Warehouse	Min. 1 Bale
Shovel	Standard	Warehouse	Min. 1
Mop & Bucket	Standard	Warehouse	Min. 1
Respirator (optional)	Filter Cartridge	Emergency Equip. Area	(Optional)
Pump	Handheld, Electric	Emergency Equip. Area	Min. 1
Wet/Dry Vacuum	Portable, Electric	Emergency Equip. Area	1

- | | | <u>Yes</u> | <u>No</u> |
|-----|--|------------|-----------|
| 25. | b. Is it tested and maintained to assure its proper operation? | <u>X</u> | — |
| | How often? <u>monthly</u> | | |
| | c. Is access maintained to communication or alarm system? | <u>X</u> | — |
| | d. Is aisle space maintained? | <u>X</u> | — |
| | e. Has facility made arrangements with local authorities? | <u>X</u> | — |
| 26. | a. Has the contingency plan ever been implemented? | <u>X</u> | — |
| | If so, was it reported? | <u>X</u> | — |
| | b. Has the plan been provided to the local authorities? | <u>X</u> | — |
| | c. Has the plan ever been amended? | <u>X</u> | — |
| | If so, were amendments provided to the local authorities? | <u>X</u> | — |
| | d. Who is the emergency coordinator? | | |
| | <u>Russ Giambone</u> | | |
| | Is he familiar with <u>all</u> aspects of the facility? | <u>X</u> | — |
| 27. | Does the permittee comply with the manifest requirements? | <u>X</u> | — |
| 28. | Does the facility's operating record include the following: | | |
| | - the description and quantity of each hazardous waste received? | <u>X</u> | — |
| | - the location of each hazardous waste within the facility, and the quantity at each location? | <u>X</u> | — |
| | - the results of the waste analysis? | <u>X</u> | — |
| | - a summary report and details of incidents that require implementation of the contingency plan? | <u>X</u> | — |
| | - manifest numbers? | <u>X</u> | — |
| | - notices to generators as specified in 40 CFR 264.12? | <u>X</u> | — |

	<u>Yes</u>	<u>No</u>
28. (continued)		
- the results of inspections (for 3 years)?	___	___
- annual certification of waste minimization?	___	___
- the closure plan and closure cost estimate?	___	___
29. Has the permittee certified that he has a program in place to reduce the volume and toxicity of the hazardous waste he generates to the degree to be economically practicable?	<u>X</u>	___
- Is it being submitted to the Department?	<u>X</u>	___
30. Has the closure plan ever been amended?	<u>X</u>	___
- Was it approved by the Department?	___	___
<i>Under Dept. Review</i>		
31. a. Will the closure cost estimate be adjusted for inflation within 60 days prior to each anniversary date of which the first closure cost estimate was prepared?	<u>X</u>	___
b. If the financial test or corporate guarantee is used, then will the closure cost estimate be updated for inflation within 30 days after the close of the firm's fiscal year and before submission of updated data to the Department?	<u>X</u>	___
c. Was the closure cost revised within 30 days of the Department's approval for the request to modify the closure plan? (if the change in the closure plan increases with the cost of closure).	___	___
<i>Under Review</i>		
d. Is the latest closure cost estimate maintained on-site?	<u>X</u>	___
32. Is the facility in compliance with the Financial Requirements of 40 CFR Subpart H?	<u>X</u>	___
<i>Tally</i>		
33. a. Are containers kept closed except when adding or removing waste?	<u>X</u>	___
b. If a container is not in good condition or begins to leak, is it transferred to another container in good condition?	<u>X</u>	___
34. Are the solvents and dry cleaning wastes separated?	<u>X</u>	___
- If so, how?	<u>by space, pallets are different</u>	

- | | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| 35. Is the permittee conducting visual inspections to detect leakage in hazardous waste areas? | | |
| - daily inspections of containers? | f | — |
| - weekly inspections of containment areas? | f | — |
| - daily inspections of the tank's high level alarms, hoses and connections? | f | — |
| - weekly inspections of the tank's valves and pumps? | f | — |
| - a biannual hydraulic and wall thickness test on the tanks? | f | — |
| - weekly inspection of wet dumpster? | f | — |
| If deterioration is noted, is it repaired? | X | — |
| 36. Is spilled or leaked waste and accumulated precipitation removed from the collection area within 24 hours, then analyzed and disposed of accordingly? | X | — |
| 37. a. Is the permittee operating the facility as specified in 264.175 and Section I.D2. of the permit application? | | |
| - container storage with a containment system whose base is free of gaps and cracks? | X | — |
| - is the base designed and operated to drain and remove liquids resulting from leaks, spills or precipitation? | X | — |
| If no - are the containers elevated or otherwise protected from contact with accumulated precipitation? | | |
| - is run-on prevented? | X | — |
| b. Is maximum number of drums less than or equal to 216 sixteen-gallon drums, and either 20 30-gallon drums or 40 15-gallon drums? | X | — |
| - contents of the mineral spirits tank less than or equal to 15,000 gallons? | X | — |
| - has the permittee notified the Department when 90% of the storage capacity has been reached? | NA | — |
| (195 16-gallon drums, and either 18 30-gallon drums or 36 40-gallon drums; 13,500 gallons in the tank). | | |
| 38. Are incompatible wastes kept separated by a physical means? (dike, berm, wall ...) | X | — |

- | | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| 39. Does the tank system meet the requirements for secondary containment found in 40 CFR 264.193? | <u>X</u> | ___ |
| a. If no, has it been determined that the tank system is not leaking or unfit for use by obtaining and keeping on file at the facility, a written assessment reviewed and certified by an independent registered professional engineer that attests to the tank's integrity by January 12, 1988, and biannually thereafter? | ___ | ___ |
| b. Does the assessment consider: | | |
| (1) design standards, if applicable, to which the tank and ancillary equipment were constructed? | <u>X</u> | ___ |
| (2) hazardous characteristics of the waste which has been handled and will be handled? | <u>X</u> | ___ |
| (3) existing corrosion protection? | <u>X</u> | ___ |
| (4) documentation of the tank age, if it exists? | <u>X</u> | ___ |
| (5) results of leak tests, internal inspection or other tank integrity examinations? | <u>X</u> | ___ |
| c. If the assessments conducted above, indicate the tank system is leaking or unfit for use, were the requirements of Specific Condition 44 met? | <u>X</u> | ___ |
| 40. For new tank components which may be required by the repair options of Specific Condition 44, will a written assessment reviewed and certified by an independent professional engineer, which attests to the components' structural integrity, be submitted to the Department? | <u>X</u> | ___ |
| 41. In order to prevent the release of hazardous waste or hazardous constituents to the environment, have or will the following requirements pertaining to secondary containment be complied with? | | |
| a. Will all new components have secondary containment pursuant to part (c) of this condition prior to being put into service? | <u>X</u> | ___ |

- | | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| b. For existing tank systems, will secondary containment, pursuant to (c) and (d) of this condition, be provided within 2 years of January 12, 1987, or when the tank system has reached 15 years of age? (whichever is later) | <u>X</u> | _____ |
| c. Is the secondary containment system: | | |
| (1) designed, installed and operated to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters? | <u>X</u> | _____ |
| (2) capable of detecting and collecting releases and run-on until such time as the collected material may be removed? | <u>X</u> | _____ |
| (3) constructed of or lined with materials compatible with the waste to be stored and have sufficient structural strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses which may be induced by the environment? | <u>X</u> | _____ |
| (4) placed on a foundation or base capable of providing support to the secondary containment system? | <u>X</u> | _____ |
| (5) provided with leak detection equipment designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours? | <u>X</u> | _____ |
| (6) sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation? | <u>X</u> | _____ |
| (7) designed and operated, with the exception of double walled tank containment, to contain 100% of the capacity of the largest tank within its boundary and also contain the precipitation due to a 25-year, 24-hour rainfall event, if run-on control is not provided? | <u>X</u> | _____ |
| d. Is ancillary equipment provided with secondary containment, except as provided for in 40 CFR 264.193(f)? | <u>X</u> | _____ |

- | | <u>Yes</u> | <u>No</u> |
|---|---------------|---------------|
| 42. a. Are hazardous wastes or treatment reagents placed in the tank system where there is a possibility that this may cause the tank system to fail? | <u> </u> | <u> X </u> |
| b. Are appropriate controls and practices used to prevent spills and overflows? | <u> X </u> | <u> </u> |
| c. In the event of a spill, will the permittee comply with the requirements of 40 CFR 264.196? | <u> X </u> | <u> </u> |
| 43. a. Has permittee developed and followed a schedule and procedure for inspecting overfill controls? | <u> X </u> | <u> </u> |
| b. Are the above-ground portions of the tank system, data from leak detection or monitoring equipment and the construction materials and area immediately around the tank inspected daily? | <u> X </u> | <u> </u> |
| c. Are cathodic protection systems, where applicable, inspected daily? | <u> NA </u> | <u> </u> |
| d. Are the results of the inspections, in (a) (b) and (c), maintained in the operating record? | <u> X </u> | <u> </u> |
| 44. Are the following requirements followed when a tank system or secondary containment system produces a leak or a spill, or is determined to be unfit for use: | | |
| - cessation of use, prevent flow or addition of waste? | <u> X </u> | <u> </u> |
| - removal of waste from tank system or secondary containment system? | <u> </u> | <u> </u> |
| - containment of visible releases to the environment? | <u> </u> | <u> </u> |
| - notification and reports? | <u> </u> | <u> </u> |
| - provision of secondary containment, repair or closure? | <u> </u> | <u> </u> |
| - certification of major repairs? | <u> ✓ </u> | <u> </u> |
| 45. Until such time as the tank system complies with the secondary containment requirements, has the permittee: | | |
| a. included in the closure plan, a plan that addresses clean closure of the tank system and a contingent plan for complying with the closure requirements of 40 CFR 264.197(b), which addresses closure and post-closure care in accordance with the closure and post-closure requirements that apply to landfills? | <u> </u> | <u> </u> |
| (40 CFR 264.310) | | |

- | | <u>Yes</u> | <u>No</u> |
|--|--------------|--------------|
| 45. b. developed a contingent post-closure plan for complying with 40 CFR 264.197(b)? | <u> </u> | <u> </u> |
| c. calculated closure cost estimates for complying with the closure/post-closure contingent plans called for in (a) and (b) of this condition? | <u> </u> | <u> </u> |
| d. based on financial assurance on the cost estimates of the closure plan or the closure/post-closure contingent plan? (whichever is greater) | <u> </u> | <u> </u> |
| e. considered for the purposes of the contingent closure and post-closure plans, the tank system to be a landfill? | <u> </u> | <u> </u> |
| Was the information submitted to the Department within 60 days of the issuance of this permit? | <u> </u> | <u> </u> |
| 46. Has permittee met the conditions of 40 CFR 264.198(a) before placing ignitable or reactive wastes in tank systems? | <u> ✓ </u> | <u> </u> |
| If so, how? _____ | | |
| 47. Has the permittee complied with the protective distance requirements for tank placement as set forth in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? [40 CFR 264.198(b)] | <u> ✓ </u> | <u> </u> |
| 48. Has the permittee introduced hazardous waste into an unwashed tank system which previously held incompatible waste or material? | <u> </u> | <u> ✓ </u> |

Date 10-13-92
Inspector Fellabaum
Facility ID# FLD 980 847214

RCRA INSPECTION REPORT
GENERATOR'S CHECKLIST

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

Section A - Site Identification No.

1. Site Name: Safety Kleen
2. Responsible Official: Russ Gramling
3. Survey Participants: me, Tim, Russ

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. D001 | D039 | D018
"Dumpster mud"
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. ←
- 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? Yes ☒ No ☐
(If no, check appropriate exemptions)

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.

Safety Klean

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

☒ Yes ☐ No
☒ 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.
- b. Manifest Document No.
- c. Generator's Name, Mailing Address, Telephone No.
- d. Transporter(s) Name, EPA I.D. No., Telephone No.
- e. Facility Name, Address, EPA I.D. No., Telephone No.
- f. DOT description of the waste
- g. (1) Containers (number and type)
- (2) Quantity (weight or volume)
- h. EPA waste no.
- i. Emergency Information (optional)
(Special handling instructions, Phone No.)
- j. Is the following certification on each manifest form?

☒ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☒ 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
- (2) Transporter
- (3) Disposer (returned copy)

☒ Yes ☐ No
☒ Yes ☐ No
☒ Yes ☐ No

- l. Indicate number of manifests inspected and number of violations.
Note type of violation in report.

20w/
0 violations

- m. If copy of manifest from facility was not returned within 35 days, did generator file an exception report? (262.42 - Exception reporting)

NA

☐ 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

☐ 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

DATE _____
FACILITY ID _____

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.

NO VEHICLES

DATE _____
FACILITY ID _____

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

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)? at facility

3. Who is in charge of keeping the records?

Name Russ Grambone Title Branch Manager

4. Any additional reporting? (262.43 - Additional Reporting) ☒ Yes ☐ No

Section F - Special Condition (262.50 - International Shipments) ☐ Yes ☐ No

Explain _____

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? X Yes ___No
- a. Is training on-the-job? | Yes ___No
- b. Is training in the classroom? V Yes ___No
2. Do laborers who handle hazardous waste complete training? X Yes ___No
- a. Is training on-the-job? | Yes ___No
- b. Is training in the classroom? V Yes ___No
3. Does training include:
- a. Emergency response procedures? X Yes ___No
- b. Inspection procedures? | Yes ___No
- c. Operation of hazardous waste handling equipment? V 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? X Yes ___No
- b. Description of employee's training? | Yes ___No
6. Are records maintained for three years? V Yes ___No

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? weekly

- d. Water of adequate volume for hoses, sprinklers or water spray system? ☒ Yes ☐ No

(1) Describe source of water city

(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? city

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? Russ Grambling
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

Date 10-13-92
Inspector Fellbaum
Facility ID# ELD 980847214

TRANSPORTERS CHECKLIST

I. SITE NAME: Safety Klean

II. TRANSPORTER REQUIREMENTS (40 CFR 263)

- 1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500) X Yes No
- 2. Does transporter have an EPA identification number? (263.11(a)) X Yes No
- 3. Does the transporter use manifest system as required by 263.20? X Yes No

Do the manifests contain at least:

- a. Name, address, and EPA ID of transporter? X Yes No
- b. Name, address, and EPA ID code of generator? Yes No
- c. Name, address, identification code of designated permitted facility? Yes No
- d. Corresponding manifest document number? Yes No
- e. Description and quantity of each hazardous waste? Yes No
- f. Signature of subsequent transporters? Yes No
- g. Signatures signifying proper delivery or reasons why delivery could not be certified? Yes No
- h. EPA waste codes? Yes No

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

III. TRANSFER FACILITY REQUIREMENTS (17-730.171)

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

B. General Facility Standards (265 Subpart B)

1. Security (265.14)

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

2. Inspection Requirement (265.15)

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

3. Personnel Training (265.16)

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

DATE _____
FACILITY ID _____

f. Is training successfully completed within 6 months of hiring/transfer to HW position? ☒ Yes ☐ No

g. Are records maintained for three years at the facility? ☒ Yes ☐ No

4. Ignitable, Reactive, or Incompatible Waste (265.17)

a. Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? ☒ Yes ☐ No

b. Are "No Smoking" signs posted in the area? ☒ Yes ☐ No

C. Preparedness and Prevention (265 Subpart C)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility) ☐ Yes ☒ No

If yes, use narrative explanation.

2. Is the facility equipped with (265.32 - required equipment):

a. Internal communications or alarm system? ☒ Yes ☐ No
Is it easily accessible in case of emergency? ☒ Yes ☐ No

b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No

c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ☒ Yes ☐ No

Is this equipment tested to assure its proper operation? ☒ Yes ☐ No

How frequently? weekly

d. Water of adequate volume for hoses, sprinklers or water spray system? ☒ Yes ☐ No

(1) Describe source of water. city

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

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space) X 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 X 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 X Yes ___ No

If yes, indicate primary authority. _____

Is the fire department a city or volunteer fire department? _____

6. Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities) X 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) X Yes ___ No

If no, has the owner/operator attempted to do this?

8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? NA Yes ___ No

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

1. Does the facility have a contingency plan?

(265.51 - Purpose and Implementation of
Contingency Plan)

☒ Yes ___ No

2. Is it maintained at the facility?

(265.53 - Copies of Contingency Plan)

☒ Yes ___ No

3. Is the contingency plan a revised SPCC Plan

(265.52 - Content of Contingency Plan)

☒ Yes ___ No

a. Does the plan include:

(1) Action personnel will take?

☒ Yes ___ No

(2) Evacuation routes?

☒ Yes ___ No

(3) Emergency Equipment?

☒ Yes ___ No

(4) Is the emergency equipment properly
inspected and maintained?

☒ Yes ___ No

4. Is there an emergency coordinator on site or
within short driving distance of the plant at
all times? (265.55 - Emergency Coordinator)

☒ Yes ___ No

5. Who is the emergency coordinator?

Russ Brambore

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

☒ Yes ___ No

D. Container Storage Checklist

(Subpart I - Use and Management of Containers 265.170)

1. Are the containers in good condition (265.171)?
(check for leaks, corrosion, bulges, etc.)

☒ Yes ___ No

2. If a container is found to be leaking, does the
operator transfer the hazardous waste from the
leaking container?

☒ Yes ___ No

3. Is the waste compatible with the containers
and/or its liner? (265.172)

☒ Yes ___ No

4. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173)

____ Yes ☒ No

If yes, explain using narrative.

5. Are each of the containers inspected at least weekly (265.174)?

☒ Yes ____ No

If no, explain using narrative concerning the frequency of inspection.

6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176)

☒ Yes ____ No

If yes, explain using narrative.

7. Are incompatible wastes stored in the same containers?

____ Yes ☒ No

If yes, explain using narrative.

8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?

☒ Yes ____ No

If no, explain using narrative.

- E. Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112(c), 265.114, 265.115? (17-30.171(2)(b))

☒ Yes ____ No

- F. ~~Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground?~~ (17-730.171(2)(d))

☒ Yes ____ No

- G. Is a written log maintained for all waste entering or leaving the transfer facility? (17-730.171(2)(e))

☒ Yes ____ No

Does the log contain:

Generators' names?

☒ Yes ____ No

Manifest numbers?

☒ Yes ____ No

Dates when waste enters and leaves facility?

☒ Yes ____ No

DATE _____
FACILITY ID _____

H. Has the facility notified the department on Form 17-730.900(6) (Transfer facility notification form)? (17-730.171(3))

☒ Yes ☐ No

I. Does the transfer facility have an EPA/DER ID number?

☒ Yes ☐ No

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

☒ N/A

1. Does the transporter have documentation that this waste was generated by an unregulated source?

☐ Yes ☐ No

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

☐ Yes ☐ No

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

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

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

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

~~3. Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)?~~

~~☐ Yes ☐ No~~

If yes, complete the Generator checklist.

V. LAND BAN WASTE

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

If yes, check appropriate box(es).

☒ Yes ☐ No

"California List" _____

F--- List _____

RCRA INSPECTION REPORT
LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility ID#: FLD 980847214 Date of Inspection: 10/13/92
Facility Name: Safety Kleen
Facility Address: 1161 Industrial Loop
Orange Park FL 32073
Facility Phone #: 904 264 2607 Facility Contact: Russ Giambrone
Contact's Title: Branch Manager
Persons present for Inspection: Russ Giambrone, Sk
Pamela Fellabaum, FDER
Tim McElroy, FDER
Date and Time Inspection Began: 10:00 10/13/92
Date and Time Inspection Ended: 1:45 10/13/92

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

D001 → Sk, Lexington SC.
F000 → Sk, Lexington SC.
D001 | F003 | F005 → Sk, Lexington SC.

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?

yes

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?

NA

(d) Does the generator have a case-by-case extension or a variance? (specify)

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:

NA

Certification Statement if Generator is Claiming to meet Treatment standards:

NA

Revision #1
Date 3-12-91

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