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PORTIONS OF THE ORIGINAL WERE OF
POOR QUALITY

Inspector: Fellabaum
Address: FOER
Telephone No: _____

RCA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Safety Klean Corp 161 Industrial Loop
B. Street (or other identifier)
C. City Orange Park FL D. State FL E. Zip Code 32073 F. County Name Clay

G. Nature of business; Identification of Operations: SIC Code(s)

FCD 980-847-214

H. EPA ID #

Paul Johnson (904) 264-2607

I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(1) F001, F002, F004, or F005 ☒ Yes ☐ No

(11) F003 ☒ Yes ☐ No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

☒ Yes ☐ No

b. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Reports _____
other (specify) _____

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Misclassified F-solvents, Appendix A-2 presents a list of corresponding F and V wastes. Note concerns below:

2. Dioxin wastes

- a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ☐ Yes ☒ No
(ii) F028 ☐ Yes ☒ No

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002 ☐ Yes ☒ No
(ii) D004 - D011 ☒ Yes ☐ No

Storage

- b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ☐ Yes ☒ No

[California waste standards are presented as Appendix C]

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ☐ Yes ☒ No

- d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? ☒ Yes ☐ No*

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ☒ Yes ☐ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

☐ Yes ☐ No

✓ A potential violation is indicated.

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

- f. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Report _____; other (specify) _____.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.107 See Appendix E for listing. List First Third Wastes handled by the generator here:
- _____
- _____

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:
- _____
- _____

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ☐ Yes ☐ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ☐ Yes ☐ No*

- e. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Report _____; other (specify) _____.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ☒ Yes ☐ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ☒ Yes ☐ No*

-/- A potential violation is indicated

3. Solvents -

- a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., Wastewaters containing solvents, ~~nonwastewaters~~ (i.e., < 1% TOC), ~~nonwastewaters~~ ~~chloride, all other spent solvent wastes~~)?
☒ Yes ☐ No*

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?
☐ Yes ☐ No*

5. First Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?
☐ Yes ☐ No*

- b. ~~Does the facility handle K061 wastes?~~ *Has the facility submitted a Softhammer certification demonstrating if it handles K061 wastes?*
☐ Yes ☐ No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (>15% Zn) [§268.7(a)] [§268.41(a)]?
☐ Yes ☐ No*

- c. Does the facility handle K101 or K102 wastes?
☐ Yes ☐ No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?
☐ Yes ☐ No*

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?
☐ Yes* ☐ No

-/ A potential violation is indicated

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

- (i) List wastes for which "applied knowledge" was used:
- _____
- _____

b. TCLP ☒ Yes ☐ No

- (i) List wastes for which "TCLP" was used:

using new waste codes

- (ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: _____

c. Total waste analysis ☐ Yes ☐ No

- d. If files were retained, describe content and basis of applied knowledge determination:
- _____
- _____
- _____

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

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

✓ A potential violation is indicated

e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(1) or §265.13(a)(3)(1)]? Yes No*

2. Did the restricted wastes exceed applicable treatment-ability group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: _____

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] Yes* X No

D. Management

1. Onsite management

a. Were restricted wastes managed onsite? X Yes No

If no, go to "2".

b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? X Yes No

If yes, TSDP checklist must be completed.

*Key
are a
TSD*

2. Offsite Management

a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? X Yes No*

(ii) Corresponding treatment standard? Yes No*

(iii) Manifest number? Yes No*

(iv) Waste analysis, if available? Yes No

A potential violation is indicated

Comments

Identify offsite treatment facilities _____

Safety Kleen

Lexington

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- (i) EPA hazardous waste I.D. number? _____ Yes _____ No*
- (ii) Corresponding treatment standard? _____ Yes _____ No*
- (iii) Manifest number _____ Yes _____ No*
- (iii) Certification regarding waste and that it meets treatment standards? _____ Yes _____ No*

Identify land disposal facilities receiving the BDAT certified wastes _____

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? _____ Yes _____ No*
- (ii) Corresponding Treatment Standards? _____ Yes _____ No*
- (iii) All applicable prohibitions? _____ Yes _____ No*
- (iv) The manifest number? _____ Yes _____ No*
- (v) The date the wastes are subject to prohibitions? _____ Yes _____ No*
- (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? _____ Yes _____ No*

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b)]:

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

- d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ☐ Yes ☐ No*

Applicable prohibitions? ☐ Yes ☐ No*

The manifest number? ☐ Yes ☐ No*

Waste analysis data, where available?
☐ Yes ☐ No

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposal in a landfill or surface impoundment [§268.33(f)]? ☐ Yes ☐ No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ☐ Yes ☐ No*

- (iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No*

- (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)]? ☐ Yes ☐ No*

-/ A potential violation is indicated

(v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? Yes No*

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? Yes No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? X Yes X No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? X 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

If yes, TSDF checklist must be completed.

-/ A potential violation is indicated

TRANSPORTER CHECKLIST

I. FACILITY IDENTIFICATION

A. Site Name Safety Klean Corp E. Street (or other identifier) 161 Ind. Loop S
Orange Park FL D. State FL F. Zip Code 32073 G. County Name Clay

G. Description of Operations

FLD 980 847 214

H. EPA ID #

Paul Johnson (904) 264 2607

I. Facility Contact (Name and Phone Number)

II. TRANSPORTER REQUIREMENTS

Comments

A. Does the transporter store restricted wastes for greater than 10 days [268.50(a)(3)]? ☒ Yes ☐ No

1. If yes, does transporter have 264/265 status as storage facility (e.g., has submitted part A7)? ☒ Yes ☐ No*

B. Describe inventory controls to ensure that restricted wastes are not stored for greater than 10 days.

C. Does the transporter mix restricted wastes prior to transport to a TSDF? ☐ Yes ☒ No

1. If yes, list the restricted wastes that have been mixed: _____

List instances where soft hammer wastes have been mixed with restricted wastes: _____

10 days for
for waste
in ~~at~~ transfer
areas

2/ A potential violation is indicated

D. Obtain a list of generators for whom restricted wastes have been transported.

Customers

E. Obtain a list of treatment, storage and disposal facilities which frequently receive restricted wastes.

Paint waste only { *Safety Kleen* *Lexington, SC*
anything else { *Linden NJ*
new castle ky