



Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT XX ROUTINE FOLLOW-UP PERMITTING
FACILITY NAME Safety-Kleen Corporation DEP/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 11/14/94 TIME 9:00 AM

TYPE OF FACILITY:

Generator Status

 Conditionally
 Exempt (<100 kg/mo)
 SQG (100-1000 kg/mo)
XX Generator (>1000 kg/mo)
 Non-Handler

Storage

XX Container
 Tank
 Waste Pile
 Surface
 Impoundment

Treatment

 Tank
 Land Treatment
 Thermal
 Chem/Phys/Bio.
 Incinerator
 Surface
 Impoundment

Transporter

XX Transporter
XX Transfer Facility

Disposal

 Landfill
 Surface Impoundment
 Waste Pile

2. Applicable Regulations:

 40 CFR 261.5 XX 40 CFR 262 XX 40 CFR 263 XX 40 CFR 264

XX 40 CFR 265 40 CFR 266 XX 40 CFR 268

3. Responsible Official: Mr. Roy Stewart, Branch Manager

4. Survey Participants & Principal Inspector: Kevin Hamilton, SK
Karen Cates, FDEP
Pamela Fellabaum, FDEP

5. Facility Long/Lat: 30°10'46"/81°43'08"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: HO 10-209007 Date Issued: 2/17/93 Exp. Date: 2/16/98

8. Prearranged Inspection: Yes XX No

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Safety-Kleen Corporation
Hazardous Waste Inspection of
November 14 & 15, 1994

PROCESS DESCRIPTION:

Safety-Kleen Corporation distributes mineral spirits, immersion cleaner, perchloroethylene and lacquer thinner to its customers. Permitted hazardous waste units include two storage tanks, a container storage area and a waste paint storage area. The facility is also a Transporter/Transfer Facility and a Large Quantity Generator. This inspection was unannounced.

Safety-Kleen distributes and services parts washers. Mineral spirits is used as a parts washer solvent. When the mineral spirits is spent, it is picked up by Safety-Kleen and replaced with new product. The drums of waste mineral spirits are transported from the customer back to Safety-Kleen and deposited into an automatic barrel washer. At the time of inspection, the facility was using only one of the two automatic barrel washers. The solid material from the drums is retained in the hopper of the barrel washer, while the D001 spent mineral spirits is pumped into a 15,000-gallon above ground storage tank. Barrel washer sludge (mineral spirits sludge or dumpster mud) is placed into drums and put in the permitted container storage area. The facility generates approximately eight (8) drums of barrel washer sludge a week from the barrel cleaning operation.

There was one 16-gallon satellite container of oil samples and industrial sample jars located to the left of the barrel washer. The container was closed and labeled as F001/F002/D001 waste. There were two 16-gallon satellite containers located to the right of the barrel washer. One container was closed and labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste contaminated rags. The other container was closed and labeled as F001/F002/F003/F005/D001/D006/D008/D039 barrel washer sludge. Safety Kleen's corporate office periodically updates waste codes for each waste stream that the facility handles by analyzing each waste stream on a national level. The waste codes for each waste stream are then provided to each facility for use until the next evaluation. The current list of waste specific codes for each waste stream was provided by the facility during the inspection and is attached (Attachment 1). The list of waste specific codes provided by the facility indicated that barrel washer sludge is characteristic only and should be coded as D001/D006/D008/D018/D039 waste. Since the waste streams in the satellite containers are from the barrel washer process, the facility must provide documentation to the Department for the addition of F-solvent waste codes and the deletion of D-characteristic codes. A complete hazardous waste determination has not been performed on these waste streams. In addition, a review of facility's manifests revealed that contaminated rags were not being manifested as a separate waste stream, there were no manifests for contaminated rags. The Department requests documentation for the disposal of the waste contaminated rags.

Safety-Kleen also handles spent perchloroethylene filters and sludge from dry cleaners, and spent immersion cleaner from auto repair shops. These wastes are received in drums and are taken directly to the permitted container storage area.

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

1. Barrel Washer Sludge

Three (3) 16-gallon drums of barrel washer sludge labeled as F001/F002/D001 waste. The waste codes D006/D008/D018/D039 were not on the drums as identified in the list of waste specific codes provided by the facility.

Seven (7) 16-gallon drums of barrel washer sludge were labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste. The waste code D018 was not on the drums as identified in the list of waste specific codes provided by the facility.

Five (5) 16-gallon drums of D001/D006/D008/D018/D039 barrel washer sludge.

The facility is not consistent in assigning D-codes for this waste stream. The addition of F001/F002/F003/F005 waste codes on these drums does not coincide with the list of waste specific codes provided by the facility in its permit application. The permit application and waste analysis plan identifies the barrel washer sludge as having D-characteristic codes only. As a result, the facility failed to make a correct hazardous waste determination on the drums of barrel washer sludge. A review of the facility's permit also revealed that the permittee shall not store any hazardous wastes which is not listed in Attachment A of the permit, pursuant to Part II, Specific Condition 2. The facility has not been permitted to store F001 waste. In addition, prior to acceptance of hazardous waste other than those listed in Attachment A of the permit, the permittee shall request a permit modification, pursuant to Part I, Specific Condition 3. The facility has not requested a permit modification to store F001 waste.

A review of the facility's manifests for barrel washer sludge revealed that the waste stream is being manifested with D-characteristic codes only.

2. Immersion Cleaner

Five (5) 16-gallon drums of D006/D008/D018/D021/D027/D035/D039/D040 immersion cleaner.

One (1) 16-gallon drum of immersion cleaner labeled as D006/D007/D008/D018/D021/D027/D039/D040 waste. The waste code D035 not being on the drum and the addition of the D007 waste code do not coincide with the list of waste specific codes provided by the facility.

One (1) 6-gallon container of immersion cleaner labeled as D006/D007/D008/D018/D021/D027/D035/D039/D040 waste. The addition of the D007 waste code does not coincide with the list of waste specific codes provided by the facility.

The facility is not consistent with the D-codes for this waste stream. As a result, the facility failed to make a correct hazardous waste determination for this waste stream.

3. Perchloroethylene Sludge

Six (6) 16-gallon drums of D007/D039/F002 perchloroethylene sludge.

4. Perchloroethylene Filters

One (1) split 30-gallon container of D039/F002 perchloroethylene filters.

One (1) split 30-gallon container of perchloroethylene filters labeled as D007/D039/F002 waste. The addition of the D007 waste code does not coincide with the list of waste specific codes provided by the facility. As a result, the facility failed to make a correct hazardous waste determination on this waste stream.

5. Oil Filters

Seven (7) 30-gallon drums of oil filters.

All of the drums in the permitted container storage area were properly labeled, dated and closed. Adequate aisle space had been provided for the containers of waste.

During the inspection of the container storage area, the inspectors were unable to determine the disposition of the mop water generated from the cleaning of this area. Tim, the warehouseman, indicated that this waste was placed in the contaminated rag satellite drum. Mr. Kevin Hamilton indicated that the mop water is placed in the barrel washer sludge. The Department will require documentation regarding the disposal of this waste stream.

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The facility's tank farm is located outside and adjacent to the main building. The 15,000-gallon 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.

Another 15,000-gallon above ground storage tank is located adjacent to the mineral spirits tank. In the past, the tank was used to store spent ethylene glycol anti-freeze mixtures. Antifreeze is now handled by Safety-Kleen as non-hazardous waste.

A review of the facility's operating record required pursuant to the permit found it to be in order.

TSD inspection logs were examined and found to be in order. The facility is reminded that the oil filters housed in the permitted container storage area contribute to the maximum storage capacity.

Safety-Kleen collects used oil and waste antifreeze from its customers for recycling. According to Mr. Hamilton, the used oil and waste antifreeze are mixed together in one railcar and sent to another Safety-Kleen facility. It was unclear during the inspection where the used oil/antifreeze was mixed and where it was sent for disposal/recycling. The Department requests further information from the facility concerning the handling of these two waste streams.

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. The flammable liquid storage building (paint waste storage building) is a permitted area. The Fluid Recovery System storage building is a waste transfer area only. Both of these buildings are operated as transfer facilities.

Building 1, Fluid Recovery System Storage, contained the following wastes:

1. Four (4) 30-gallon drums of D006/D008 parts washer waste.
2. Two (2) 5-gallon containers of D011 waste fixer solution.
3. One (1) 16-gallon drum of D039/F002 waste perchloroethylene separator water.

All containers were closed, labeled and dated. Adequate aisle space had been provided between all containers of waste, and all had been accumulating for less than ten (10) days.

Building 2, Flammable Liquid Storage, contained the following wastes:

1. Five (5) 5-gallon containers of D001/D008/D018/D035/D039/F003/F005 waste paint.
2. Ten (10) 16-gallon drums of D001/D035/D039/F003/F005 waste paint.

All containers were closed, labeled and dated. Adequate aisle space had been provided between all containers of waste.

According to Mr. Kevin Hamilton, accumulated precipitation from the flammable liquid storage building (waste paint storage) is disposed of with the used oil or absorbed onto pads. A review of the facility's permit revealed that accumulated precipitation must be disposed of in accordance with Attachment II.B.1 of the permit application, per the requirements of 40 CFR 264.175.

The southwestern corner of the main facility is also operated as a transfer facility. There were three (3) 30-gallon drums of D006/D008 parts washer waste. The drums were closed, labeled and dated, and had been accumulating for less than ten (10) days.

A review of the facility's transfer facility operating records revealed that manifests for waste paint in 5-gallon and 16-gallon containers are terminated at Safety-Kleen, Orange Park. The waste paint is then re-manifested with Safety-Kleen, Orange Park as the generator and Safety-Kleen, Lexington, SC as the final TSD. This practice is acceptable because the paint waste storage building is a permitted unit. A review of these manifests found them to be order.

Fluid Recovery Systems (FRS) waste comes into and goes out of the FRS transfer facility on the same manifest. A review of the operating log for FRS waste indicated that several shipments of FRS waste were manifested out of the facility on different manifests than received. Further review of the log and discussion with facility personnel revealed that a computer program error allowing the incorrect manifest number to be carried down in the outbound manifest column caused the log to indicate different outbound manifest numbers. The error was not detected by the facility, and as a result, the transfer facility operating log is not correct.

The review of the transfer facility operating records also found that the flammable liquid storage building (paint waste storage building) and the Fluid Recovery System storage building are not being used as illustrated in the permit application. Diagrams included in the application show the flammable liquid storage building on the east side of the Fluid Recovery System storage

building. At the facility, the flammable liquid storage building is on the west side of the Fluid Recovery System storage building. It should be noted that the flammable liquid storage building is a permitted area. The Fluid Recovery System storage building is a waste transfer area. This facility diagram and other similar diagrams also have the incorrect directional orientation. The Department will require the facility to submit a permit modification to correct the permit application drawings that are affected by these errors.

Safety-Kleen is also a large quantity generator of hazardous waste. Numerous manifests were examined during the generator record review portion of the inspection. The following are violations that were observed on the manifests and Land Disposal Restriction Notification (LDR) forms examined:

1. Manifest Number 21436 - The waste codes D035 and D040 were omitted from Item 11a (waste mineral spirits). The LDR notification form was correct.
2. Manifest Number 09760 - The waste codes D035 and D040 were omitted from Item 11a (waste mineral spirits). The LDR notification form was correct.
3. Manifest Number 68532 - The waste codes D035 and D040 were omitted from Item 11a (waste mineral spirits). The LDR notification form was correct.
4. Manifest Number 92894 - The waste codes D035, D039 and D040 were omitted from Item 11a (waste paint) and Item 11c (waste immersion cleaner). The LDR notification form was correct.
5. Manifest Number 90894 - The waste codes D035, D039 and D040 were omitted from Item 11c (waste immersion cleaner). There was no LDR notification forms for Item 11a (waste paint) and Item 11b (waste paint).
6. Manifest Number 09894 - The manifest was correct. The waste code D039 was not indicated on the LDR notification form for Item 11b (waste tetrachloroethylene).
7. Manifest Number 42916 - The manifest was correct. The waste code D007 for Item 11a (waste tetrachloroethylene) and the waste code D039 for Item 11c (waste tetrachloroethylene) were not indicated on the LDR notification form.
8. Manifest Number 74713 - The manifest was correct. There were no treatment standards marked on the LDR notification forms for Item 11a (waste tetrachloroethylene) and Item 11b (waste tetrachloroethylene).

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9. Manifest Number 38852 - The manifest was correct. There were no treatment standards marked on the LDR notification forms for Item 11a (waste tetrachloroethylene) and Item 11b (waste tetrachloroethylene).
10. Manifest Number 78023 - The manifest was correct. There were no treatment standards marked on the LDR notification forms for Item 11c (waste tetrachloroethylene) and Item 11d (waste tetrachloroethylene).
11. Manifest Number 04993 - The manifest was correct. There were no LDR notification forms for Item 11a (waste paint) and Item 11b (waste paint).
12. Manifest Number 11223 - The manifest was correct. There were no LDR notification forms for Item 11a (waste paint) and Item 11b (waste paint).
13. Manifest Number 11180 - The manifest was correct. There were no LDR notification forms for Item 11a (waste paint) and Item 11b (waste paint).
14. Manifest Number 37023 - The manifest was correct. There were no LDR notification forms for Item 11a (waste paint) and Item 11b (waste paint).
15. Manifest Number 86243 - The manifest was correct. There were no LDR notification forms for Item 11a (waste tetrachloroethylene) and Item 11c (waste tetrachloroethylene).

A review of the facility's generator records found the contingency plan to be updated and in order. A Biennial Report had been filed. Arrangements with local authorities had been documented. Weekly container inspections were being conducted and documented. Personnel training records including job titles and job descriptions were in order.

SUMMARY OF VIOLATIONS

The following are violations of the Florida Administrative Code Sections 62-730.160 and 62-730.183 which adopt and incorporate by reference Title 40 Code of Federal Regulations (CFR) Parts 262 and 268.

40 CFR 262.11 - Hazardous Waste Determination

A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:

- (a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4.
- (b) He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.

NOTE: Even if the waste is listed, the generator still has an opportunity under 40 CFR 260.22 to demonstrate to the Administrator that the waste from his particular facility or operation is not a hazardous waste.

- (c) For purposes of compliance with 40 CFR Part 268, or if the waste is not listed in Subpart D of this part, the generator must then determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - (1) Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 - (2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.
- (d) If the waste is determined to be hazardous, the generator must refer to Parts 264, 265, 268 of this chapter for possible exclusions or restrictions pertaining to management of his specific waste.

VIOLATION: Facility failed to make a complete, correct hazardous waste determination on each of the following waste streams:

- 1. The 16-gallon satellite drum of oil samples and industrial samples jars that had been labeled as F001/F002/D001 waste.

40 CFR 262.11 - Hazardous Waste Determination (continued)

- VIOLATION:
2. The 16-gallon satellite drum of contaminated rags that had been labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste.
 3. The 16-gallon satellite drum of barrel washer sludge that had been labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste.
 4. The three (3) 16-gallon drums of barrel washer sludge labeled as F001/F002/D001 waste.
 5. The seven (7) 16-gallon drums of barrel washer sludge labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste.
 6. The one (1) 16-gallon drum of immersion cleaner that had been labeled as D006/D007/D008/D018/D021/D027/D039/D040 waste.
 7. The one (1) 6-gallon container of immersion cleaner that had been labeled as D006/D007/D008/D018/D021/D027/D035/D039/D040 waste.
 8. The one (1) split 30-gallon container of perchloroethylene filters that had been labeled as D007/D039/F002 waste.
 9. Facility failed to assign the waste codes D035 and D040 to shipments of waste mineral spirits on manifest numbers 21436, 09760 and 68532.
 10. Facility failed to assign the waste codes D035, D039 and D040 to shipments of waste paint and waste immersion cleaner on manifest numbers 92894 and 90894.

40 CFR 268.7(a)(1)(ii) - Waste Analysis

- (a) Except as specified in 40 CFR 268.32 or section 268.43 of the part, the generator must test his waste, or test an extract developed using the test method described in Appendix I of this part, or use knowledge of the waste, to determine if the waste is restricted from land disposal under this part.

- (1) If a generator determines that he is managing a restricted waste under this part and the waste does not meet the applicable treatment standards set forth in Subpart D of this part or exceeds the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA Section 3004(d), with each shipment of waste the generator must notify the treatment or storage facility in writing of the appropriate treatment standards set forth in Subpart D of this part and any applicable prohibition levels set forth in 40 CFR 268.32 or RCRA Section 3004(d). The notice must include the following information.
 - (ii) The corresponding treatment standards for wastes F001-F005, F039, and wastes prohibited pursuant to 40 CFR 268.32 or RCRA Section 3004(d). Treatment standards for all other restricted wastes may be referenced by including on the notification the subcategory of the waste, the treatability group(s) of the waste(s), and the CFR section(s) and paragraphs where the treatment standards appear. Where the applicable treatment standards are expressed as specified technologies in 40 CFR 268.42, the applicable five-letter treatment code found in Table 1 of 40 CFR 268.42 (e.g., INCIN, WETOX) also must be listed on the notification.

VIOLATION: Facility failed to assign the appropriate waste codes on the LDR form for manifest numbers 09894, 42916, 74713, 38852 and 78023.

40 CFR 268.7 (a)(7) - Waste Analysis

- (a) Except as specified in 40 CFR 268.32 or section 268.43 of the part, the generator must test his waste, or test an extract developed using the test method described in Appendix I of this part, or use knowledge of the waste, to determine if the waste is restricted from land disposal under this part.
- (7) Generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested

characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2 - 261.6, or exempted from subtitle C regulation, subsequent to the point of generation.

VIOLATION: Facility failed to maintain on-site copies of Land Disposal Restriction Notifications (LDRs) corresponding to manifest numbers 90894, 04993, 11223, 11180, 37023 and 86243

40 CFR 268.50 (a)(2)(i) - Prohibitions on Storage of Restricted Wastes

- (a) Except as provided in this section, the storage of hazardous wastes restricted from land disposal under Subpart C of this part of RCRA section 3004 is prohibited, unless the following conditions are met:
- (2) An owner/operator of a hazardous waste treatment, storage, or disposal facility stores such wastes in tanks or containers solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal and:
- (i) Each container is clearly marked to identify its contents and the date each period of accumulation begins;

VIOLATION: Facility failed to clearly mark to identify the contents of the following containers in the permitted container storage area:

1. The three (3) 16-gallon drums of barrel washer sludge labeled as F001/F002/D001 waste.
2. The seven (7) 16-gallon drums of barrel washer sludge labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste.
3. The one (1) 16-gallon drum of immersion cleaner that had been labeled as D006/D007/D008/D018/D021/D027/D039/D040 waste.
4. The one (1) 6-gallon container of immersion cleaner that had been labeled as D006/D007/D008/D018/D021/D027/D035/D039/D040 waste.

The following is a violation of Florida Administrative Code (FAC)
Chapter 62-730.

62-730.160 (4) Standards Applicable to Generators of Hazardous Waste

- (4) Generators of hazardous waste shall complete the following sections of the Uniform Hazardous Waste Manifest: Items 1 through 20, D, F, H, I and K on Form 8700-22, and Items 21 through 35, O, Q, R and T on Form 8700-22A.

Copies of this form and instructions may be obtained by contacting the Hazardous Waste Regulation Section, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

VIOLATION: Facility failed to include the appropriate waste codes on manifests numbers 21436, 09760, 68532, 92894 and 90894.

62-730.171(2)(e) Transfer Facilities

- (2) A transfer facility used for storage of hazardous waste for more than 24 hours but ten (10) days or less shall comply with the following requirements as adopted by reference in 62-730.180, F.A.C.:

- (e) Transfer facility shall maintain a written record of when all hazardous waste enters and leaves the facility. This record shall include the generator's name, the generator's EPA/DEP identification number, and the manifest number. For conditionally exempt small quantity generators without an EPA/DEP identification number, the record shall include the name and address of the generator. This recordkeeping requirement applies to all hazardous wastes including hazardous waste generated by conditionally exempt small quantity generators.

VIOLATION: Facility failed to maintain a written record that included the correct manifest numbers for FRS wastes that entered and left the facility.

The following are violations of Department Permit No. HO 10-209007 issued February 17, 1993:

Permit No. HO 10-209007, Part I, Specific Condition 3

Prior to acceptance of hazardous wastes other than those specified in Attachment A of the permit, the permittee shall submit to the Department a request for permit modification. This request shall include a complete waste analysis of the proposed new waste stream. This analysis must be incorporated in the general waste analysis plan and retained on site. The permittee shall not accept a new waste stream until the permit has been modified by the Department. [40 CFR 264.13]

VIOLATION: Facility failed to submit a request for a permit modification to the Department to store the following wastes:

- 1) Three (3) 16-gallon drums of barrel washer sludge that had been labeled as F001/F002/D001 waste
- 2) Seven (7) 16-gallon drums of barrel washer sludge that had been labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste.

Permit No. HO 10-209007, Part I Specific Condition 4

The permittee shall follow the procedures, described in the waste analysis plan, Section II.A.6 of the permit application.

VIOLATION: Facility accepted and stored wastes that were not in accordance with the waste analysis plan:

- 1) Three (3) 16-gallon drums of barrel washer sludge that had been labeled as F001/F002/D001 waste
- 2) Seven (7) 16-gallon drums of barrel washer sludge that had been labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste.

Permit No. HO 10-209007, Part II, Specific Condition 2

The permittee shall not store any hazardous waste(s) which is not listed in Attachment A of the permit, non-hazardous waste(s) or raw materials/products in permitted container storage areas, except as specified in Specific Condition 7.b and e., Part II of the permit.

VIOLATION: Facility is not permitted to store F001 waste:

- 1) Facility stored three (3) 16-gallon drums of barrel washer sludge that was labeled as F001/F002/D001 waste.
- 2) Facility stored seven (7) 16-gallon drums of barrel washer sludge that was labeled as F001/F002/F003/F005/D001/D006/D008/D039 waste.

Permit No. HO 10-209007, Part II, Specific Condition 5

Spilled or leaked waste and accumulated precipitation must be removed from the collection area within 24 hours, then analyzed and disposed of in accordance with Attachment II.B.1 of the application, per the requirements of 40 CFR 264.175.

VIOLATION: Facility failed to dispose of accumulated precipitation in the waste paint storage area in accordance with Attachment II.B.1 of the permit application.

RECOMMENDED CORRECTIVE ACTION:

40 CFR 262.11

- Within thirty (30) days, facility shall provide to the Department documentation for each of the facility's waste streams including waste codes for each waste stream and justifications for code assignment.
- Effective immediately and henceforth, facility shall assign the appropriate waste codes to all shipments of hazardous waste.

40 CFR 268.7 (a)(1)(ii)

- Within thirty (30) days, facility shall provide documentation to the Department that wastes on manifest numbers 09894, 42916, 74713, 38852 and 78023 were treated to the appropriate levels prior to land disposal.

40 CFR 268.7 (a)(7)

- Effective immediately and henceforth, facility shall maintain copies of all Land Disposal Restriction notifications (LDRs) for at least five years. Within thirty (30) days, facility shall provide documentation to the Department that the wastes on manifest numbers 90894, 04993, 11223, 11180, 37023 and 86243 were treated to the appropriate levels prior to land disposal.

40 CFR 268.50 (a)(2)(i)

- Effective immediately and henceforth, facility shall indicate the correct waste codes on all drums/containers of hazardous waste in the permitted container storage area.

62-730.160 (4)

- Effective immediately and henceforth, facility shall assign the appropriate waste codes to all shipments of hazardous waste.

62-730.171(2)(e)

- Within thirty (30) days, facility shall submit to the Department a written plan that outlines a program to correct the transfer facility operating log program to eliminate data entry errors.

Permit No. HO 10-209007,
Part I, Specific Condition 3
Part II, Specific Condition 2

- Effective immediately and henceforth, facility shall not accept or store waste not permitted under Permit No. HO 10-209007 without applying for and receiving a permit from the Department.

Permit No. HO 10-209007,
Part I, Specific Condition 4

- Effective immediately and henceforth, facility shall not accept or store waste that is not in accordance with the facility's waste analysis plan.

Permit No. HO 10-209007,
Part II, Specific Condition 5

- Within thirty (30) days, facility shall submit to the Department a plan to ensure compliance with this specific condition of the facility's permit. Within one (1) day after Department approval of the plan, facility shall implement the plan to manage spilled or leaked waste and accumulated precipitation.

AREAS OF CONCERN:

Facility shall submit to the Department the following information within thirty (30) days:

1. Documentation for the addition of F-solvent waste codes and the deletion of D-characteristic codes on the barrel washer sludge.

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2. Manifests for the disposal of barrel washer sludge contaminated rags.
3. Documentation for the disposal of mop water from the permitted container storage area.
4. Information concerning the used oil/waste antifreeze mixture including where the actual mixing takes place and the final disposal/recycling site.
5. Permit modification to correct the permit application drawings that are effected by the Fluid Recovery System storage building and flammable liquid storage building reversal.

**USDOT SHIPPING DESCRIPTIONS
OIL SERVICES**

**Waste Oil
SKDOT#1073**

Waste Oil
(Not USDOT Regulated)

**Combustible Waste Oil
SKDOT#1061**

Combustible Liquid, N.O.S.
(Petroleum Oil) NA1993 PGIII (ERG#27)

**Fuel Oil
SKDOT#1248**

Fuel Oil (No.)
3 NA1993 PGIII (ERG#27)
(Not USEPA Regulated)

Note: Enter fuel oil No. 1,2,4,5 or 6 in description

**Antifreeze
SKDOT#1176**

Used Antifreeze
(Not USDOT or USEPA Regulated)

**Oil/Water Mix
SKDOT#1082**

Waste Oil and Water Mixture
(Not USDOT Regulated)

**U OT SHIPPING DESCRIPTION
PARTS WASHER SERVICE**

105 Solvents

SKDOT#501

NON-RQ

SKDOT#585 - RQ

SKDOT #528 - RQ

BULK

NOTE: Use RQ for 100lbs./container or more

Waste Combustible Liquid, N.O.S.

(Petroleum Naphtha) NA1993 PGIII

(D001)(D006, D008, D018, D035, D039, D040)

In section I/J put: D001, D006, D008, D018, D035, D039, D040

Virgin Solvents

SKDOT#571

NON-RQ

SKDOT#572-RQ

Note: This is for TCLP or customer cert. only.

Waste Combustible Liquid, N.O.S.

(Petroleum Naphtha) NA1993 PGIII

(D001)(ERG#27)

In section I/J put: D001

140/150 Non-Hazardous

SKDOT#557

Combustible Liquid, N.O.S.

(Petroleum Naphtha) NA1993 PGIII

(Not USEPA Regulated)(ERG#27)

150 - Cyclonic Unit

SKDOT#653

Waste Combustible Liquid, N.O.S.

(Petroleum Naphta) NA1993 PGIII (ERG#27)

(D006, D008, D018, D039, D040)

In section I/J put: D006, D008, D018, D039, D040

Immersion Cleaner 699

SKDOT#566

Waste Compounds, Cleaning Liquid

(Monoethanolamine) 8 NA1760 PGIII

(D006, D008, D018, D021, D027, D035, D039, D040)

In section I/J put: D006, D008, D018, D021, D027, D035, D039, D040

Oil Filters

SKDOT#1476

Drained Oil Filters

(Not USDOT or USEPA Regulated)

Dumpster Mud/Sludge

SKDOT#527

(offsite)

RQ Waste Combustible Liquid, N.O.S.

(Petroleum Naphtha) NA1993 PGIII (D001)

(D006, D008, D018, D039)

In section I/J put: D001, D006, D008, D018, D039

ACTREL

SKDOT#634

Waste Combustible Liquid, N.O.S.

(Aliphatic Hydrocarbons) NA1993 PGIII

(D006, D008, D018, D039, D040)

In section I/J put: (D006, D008, D018, D039, D040)

**USDOT SHIPPING DESCRIPTIONS
SPECIAL MARKETS**

**Paint Thinner-5GAL
SKDOT#523**

Waste Paint Related Material
3 UN1263 PGII (F005, F003, D001, D008, D018, D035, D039, D040)
In section I/J put: F005, F003, D001, D008, D018, D035, D039, D040

**Paint Thinner-16GAL
SKDOT#524**

RQ Waste Paint Related Material
3 UN1263 PGII (F005, F003, D001, D035, D039)
In Section I/J put: F005, F003, D001, D035, D039

**Paint Booth Filters
SKDOT#638**

RQ Hazardous Waste, Solid, N.O.S.
9 NA3077 PGIII (D007) (ERG#31)
In Section I/J put: D007

**Perchloroethylene
SKDOT#506**

RQ Waste Tetrachloroethylene
6.1 UN1897 PGIII (F002, D007, D039)
In section I/J put: F002, D007, D039

**Perc Separator Water
SKDOT#631**

RQ Hazardous Waste, Liquid, N.O.S.
9 NA3082 PGIII (F002, D039)
In section I/J put: F002, D039
Note: Technical name not required.

**Dry Cleaning Naphtha
SKDOT#569**

RQ Waste Combustible Liquid, N.O.S.
(Petroleum Naphtha) NA1993 PGIII
(D001, D039)
In section I/J put: D001, D039

**Perc Filters
SKDOT#906**

Waste Tetrachloroethylene
6.1 UN1897 PGIII (F002, D039)
In Section I/J put: F002, D039

**Photographic Solutions
SKDOT#630**

Used Photographic Developer Solution
(Not USDOT or USEPA Regulated)

Note: Developer or Developer/Fixer Mixture

**Fixer Solution
SKDOT#629**

RQ Hazardous Waste, Liquid, N.O.S.
9 NA3082 PGIII (D011) (ERG#31)
In Section I/J put: D011
Note: Technical name not required

original

SAFETY KLEEN CORPORATION
HO 10-209007

SPECIFIC CONDITIONS

YES NO

1. Has the permittee maintained and operated the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or constituents to air, soil, or surface water which could threaten human health or the environment [40 CFR 264.31]?
2. Has the permittee complied with the following following conditions concerning required notices?
 - a. Notification to the Department in writing at least four weeks in advance of the date the permittee expects to receive hazardous waste from a foreign source in accordance with 40 CFR 264.12(a)?
 - b. When the permittee is to receive hazardous waste from an off-site source, has he informed the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping?
 - c. Has the permittee kept a copy of this written notice as part of the operating record? [40 CFR 264.12(b)]
3. Prior to acceptance of hazardous wastes other than those specified in the permit, did the permittee submit a request for a permit modification?

Did the request include a complete waste analysis of the proposed new waste stream?
4. Has the permittee followed the procedures described in the waste analysis plan?
 - customer's process received?
 - contents of drums verified when serviced?
 - drums kept closed until they reach the recycle center?

X _____

N/A

_____ X *see report*

N/A

_____ X *see report*

X _____
X _____
X _____

SAFETY KLEEN
HO 10-209007

YES NO

5. Does the facility comply with the security provisions in 40 CFR 264.14(b)(2) and (c)?

X

- fence and gates?

X

- signs with the legend "Danger
Unauthorized Personnel"

X

6. Does the permittee inspect the facility operating, emergency and safety equipment at least weekly?

X

Is the safety equipment in the trucks inspected daily?

X

Are discrepancies or deficiencies corrected expeditiously?

X

Were any changes, additions or deletions to the schedule approved by the Department?

N/A

Is the schedule maintained as part of the operating record?

X

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

X

b. Has training been documented?

X

c. Is training reviewed annually?

X

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

X

b. Are containers holding ignitable wastes at least 50' from the property line?

X

c. Do the tanks comply with the requirements for the maintenance of protective distances pursuant to Tables 2-1 through 2-6 of the National Fire Protection Associations "Flammable and Combustible Liquids Code" (1977 or 1981)?

X

YES

NO

9. a. Does the facility maintain the following equipment listed in the contingency plan?

X

SPILL CONTROL AND EMERGENCY RESPONSE EQUIPMENT

| Descriptions | Type/Capacity | Location | Quantity |
|-------------------------------|------------------------|------------------------|------------------------|
| Fire Extinguisher | ABC (10 lb) | Container Storage Area | 3 |
| Fire Extinguisher | ABC | Tank Storage Area | 1 |
| Eyewash | Fountain | Warehouse | 1 |
| Eyewash | Fountain | Tank Farm | 1 |
| First-Aid | | Office | 1 |
| Telephones | Standard | Manager's Office | 1 |
| Telephones | Standard | Secretary's Desk | 1 |
| Telephones | Standard | Warehouse | 2 |
| Gloves | Rubber | Emergency Equip. Area | Min. 1 |
| Protective Clothing | Apron | Emergency Equip. Area | Min. 1 |
| Eye Protection | Goggles/Safety Glasses | Emergency Equip. Area | Min. 1 |
| Sorbent Material | Oil Absorbing | Emergency Equip. Area | Min. 1 bale- 1 Drum |
| Shovel | Standard | Emergency Equip. Area | Min. 1 |
| Mop and Bucket | Standard | Warehouse | Min. 1 |
| Pump | Hand-held, Electric | Warehouse | Min. 1 |
| Empty Containers for Overpack | 30, 55, and 85 gallons | Warehouse | 4 |
| Alarm - High Level | N/A | Tank Storage Area | 1 |
| Alarm | N/A | Container Storage Area | 1 |
| Alarm - Emergency | N/A | Return/Fill Shelter | 1 |

| | YES | NO |
|--|----------|-------|
| b. Is it tested and maintained to assure its proper operation? | <u>X</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> | _____ |
| 10. a. Has the permittee carried out the provisions of the contingency plan whenever there was a fire, explosion, or release of hazardous waste or hazardous waste constituents which threatened or could have threatened human health or the environment? | <u>X</u> | _____ |
| Did the permittee give proper notification when an emergency arose and submit within fifteen (15) days a written report to the Department, including all of the information required in 40 CFR 264.56j? | <u>X</u> | _____ |
| b. Has the plan been provided to the local authorities? | <u>X</u> | _____ |
| c. If any changes were made to the plan, did the permittee revise it within seven (7) days of the amendment. [40 CFR 265.54(a)(b) and (c)] | N/A | _____ |
| Was the amended plan submitted to the Department: | ↓ | _____ |
| d. Who is the emergency coordinator? Is she/he familiar with <u>all</u> aspects of the facility? <i>Roy Stewart</i> | <u>X</u> | _____ |
| 11. Does the permittee comply with the manifest requirements? | <u>X</u> | _____ |
| 12. 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> | _____ |

YES NO

- notices to generators as specified in 40 CFR 264.12? X
- the results of inspections (for 3 years)? X
- annual certification of waste minimization? X
- the closure plan and closure cost estimate? X
- biennial reports? X

Are the records maintained at the facility until completion and certification of closure? [40 CFR 264.73] will be

13. Pursuant to 40 CFR 264.73(b)(9), and Section 3005(h) of RCRA, 42 U.S.C. 6925(h), has the permittee certified, no less often than annually, that:

- a. The permittee has a program in place to reduce the volume and toxicity of hazardous waste to the degree determined by the permittee to be economically practicable? X
- b. The proposed method of treatment, storage or disposal is the most practicable method available to the permittee which minimizes the present and future threat to human health and the environment? X
- c. The permittee also maintains copies of the certifications in the facility operating record as required by 40 CFR 264.73(b)(9)? X

14. Does the Waste Minimization program required under Specific Condition 12.a. and b., Part I at a minimum address the following topics:

- a. Identify each hazardous waste stream with the source of generation? X
- b. Types and amounts of hazardous waste that are generated at the facility? X
- c. Present and proposed method of treatment, storage or disposal that is available to the permittee? X
- d. Description of techniques implemented in the past for hazardous waste reduction of their effectiveness? X
- e. An evaluation of technically and economically feasible hazardous waste reduction techniques? X
- f. A program and schedule for implementing the selected hazardous waste reduction technique? X

- | | YES | NO |
|--|-------|--------------|
| 15. Has the permittee applied for an extension, waiver or variance under 40 CFR 268? | _____ | _____ |
| If so, did the permittee comply with all of the restrictions on land disposal until final approval of the application? | _____ | _____ |
| 16. Were restricted wastes placed in land disposal units without further treatment? | _____ | _____ |
| 17. Did the permittee store restricted hazardous waste without complying with 40 CFR 268(e)? | X | X See report |
| 18. Has the permittee maintained compliance with the financial requirements of 40 CFR 264 Subpart H? | _____ | _____ |

Part II Container Storage Areas

- | | | |
|--|-------|--|
| 1. Is the permittee only storing those wastes listed in Attachment A of the application in the approved storage area? | _____ | X See report |
| Do containers conform to DOT specifications or UN performance criteria and are they managed in accordance with the approved operating plan? | X | _____ |
| Are containers kept closed except when adding or removing waste and handled in a manner that does not allow them to leak or rupture? [40 CFR 264.173] | X | _____ |
| If a container holding hazardous waste is not in good condition, or begins to leak, will the waste be transferred to another container that is in good condition? | X | _____ |
| 2. Has the permittee stored any hazardous waste not listed in Attachment A, non-hazardous wastes or raw materials/products in the permitted container storage areas except as provided in Specific Condition 7.b and e. Part II of the Permit? | _____ | Dumpster Mud FOO1/FOO2/FOO3/FOO5 X |
| 3. Does the permittee only use those containers made of or lined with materials which will not react with or are otherwise compatible with the waste to be stored in them? [40 CFR 264.172] | X | _____ |
| 4. a. Does the permittee conduct daily visual inspections, to detect leakage in the hazardous waste areas or their associated loading/unloading zones, per 40 CFR 264.174? | X | _____ |

YES NO

- b. Do daily inspections of containers consist of the following?
- Physically examine the container storage area to verify that leaks have not occurred since the last inspection.
 - Verify that containers have not been damaged or rusted to the point of near leakage.
 - Replace or adjust damaged, missing, or loose fasteners.
 - Examine and verify that all container identification, dates, loading data, and hazardous waste labels are attached and current.
- c. If, in spite of the daily inspections, a significant deterioration of the concrete pad or joint sealant material (due to occasional spills) is noted, has the need for a protective coating/more resistant seal material been re-evaluated?
5. Is spilled or leaked waste and accumulated precipitation removed from the collection area within 24 hours, then analyzed and disposed of accordingly? [40 CFR 264.175]
6. Does the permittee comply with the waste compatibility requirements of 40 CFR 264.177?
- Is there a 50-foot distance from property line to flammable container storage?
 - Is there a 20-foot distance from property line to flammable tank storage?
 - Is there a 5-foot distance from a flammable tank to a major structure?
7. Has the permittee complied with the following conditions concerning operation of the container storage facilities:
- a. Maintaining and operating
 - b. Storage of a maximum of 2168 gallons of hazardous waste in 5, 16, 30, split 30 or 55 gallon size DOT approved containers in the container storage area?

X _____

X _____

X _____

X _____

N/A _____

_____ Rainwater
_____ paint waste
_____ X Storage
_____ area

X _____

X _____

X _____

X _____

X _____

YES

NO

- Are the only wastes in storage, immersion cleaner, dry cleaning waste, mineral spirits dumpster mud, tank bottoms with waste codes listed in Attachment A, and oil filter containers?
- c. Has the permittee notified the Department when the volume of waste in the container storage area has reached 95% (i.e. 2,060 gallons)?
- d. Has the permittee stored more than 1280 gallons of hazardous waste in 5 or 16 gallon size DOT approved containers in the paint storage building?
- e. Has the permittee stored virgin paint thinners when the total storage capacity of the permit has been exceeded?
- f. Has the permittee notified the Department when the volume of waste in the paint storage area reaches 95% of the permitted capacity (i.e. 1,216 gallons)?
- g. Has the permittee stacked containers more than two high or six feet high in the container storage area or the paint storage shelter?
- h. Has the permittee segregated virgin paint thinners from waste paint thinners for storage?

X *See report*

N/A

X

X

N/A

X

X

Part III - Tanks

1. Is the permittee only storing waste mineral spirits and waste anti-freeze with the waste codes specified in Attachment A and in the designated tanks?
2. Has the permittee stored more than 15,000 gallons of waste in each storage tank?
3. Has the permittee notified the Department when the volume of waste stored in any tank reaches 95% capacity of the tank (14,250 gallons)?
4. Has the permittee placed ignitable or reactive waste in a tank system where the waste is not protected from any material or conditions that may cause it to ignite or react?

X

X

N/A

X

YES NO

5. Has the permittee complied with the protective distance requirements for the tanks' placement as set forth in Tables 2-1 through 2-6 of the National Fire Protection Associations "Flammable and Combustible Liquids Code"? X _____
6. Has the permittee handled incompatible wastes by not introducing it into unwashed tank systems which previously held incompatible waste or material? [40 CFR 264.199] N/A _____
7. For new tank components that may need the repair options of 40 CFR 264.196(f) and Specific Condition 11 Part III, did the permittee submit a written assessment, reviewed and certified by an independent registered professional engineer which attests to the components structural integrity? N/A _____
- Did the assessment include the requirements of 40 CFR 264.192? _____
- Did an independent, qualified inspector or independent professional engineer inspect the installation? _____
8. Does the secondary containment system meet the following requirements: N/A _____
- a. Did all new components have secondary containment as required by parts (b) and (c) of this condition prior to being put into service? _____
- b. Does the secondary containment system meet the following requirements: _____
1. Updated to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters? _____
2. Capable of detecting and collecting releases and run-on until the collected material is removed? _____
3. Lined with materials compatible with the waste to be stored and have sufficient structural strength to sustain the stresses which may be induced by the environment? _____
4. Placed on a foundation or base capable of providing subpart to the secondary containment system? _____

YES

NO

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? N/A
6. Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation? _____
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? _____
- a. Is ancillary equipment provided with secondary containment, except as provided for in 264.193(f)? _____
9. Has the permittee:
- a. Placed hazardous waste or treatment reagents in a tank system if the possibility exist that this would cause the tank system to fail? _____ X
- b. Used appropriate controls and practices to prevent spills and overflows? X _____
- c. Followed the operating procedures described in Attachment II C.2. of the permit application, and X _____
- d. Complied with the requirements of 264.196 if a leak or spill occurs? _____ N/A _____
10. Has the permittee inspected the tank system in accordance with the following:
- a. Developed and followed a schedule and procedure for inspecting overfilling controls? X _____
- b. Inspection at least once each operating day the above-ground portions of the tank system? X _____
- c. Are results of these inspections maintained in the operating record of the facility? X _____

YES NO

11. Will the permittee follow the procedures described below when a tank system or secondary containment produces a leak or spill, or is determined to be unfit for use? (264.196)

- a. Cessation of use; prevent flow or addition of waste?
 - b. Removal of waste from the tank system or secondary containment system?
 - c. Containment of visible releases to the environment?
 - d. Notifications; reports?
 - e. Provision of secondary containment?
 - f. Certification of major repairs?
12. Has the permittee operated the drum washers in the return and fill areas, as part of the tank systems?
13. Has the permittee complied with the following conditions for the operation of the drum washers:
- a. Remove the liquids and the sludge from the sump in the bottom of the drum washers, upon completion of each working day?
 - b. Process drums in the drum washers upon receiving and not accumulate drums in the return and fill area for more than 24 hours?

14. Are both tank systems inspected and certified by a professional engineer, registered in the State of Florida, for structural category, hydraulic testing, internal inspection, wall thickness determination and other requirements of 264.192 by no later than October 31, 1997.

Will this certification be included in the permit application renewal as required by Specific Condition 6, Part V of the permit?

PART IV - CLOSURE

1. Has the permittee complied with the following conditions concerning closure?

YES

NO

- a. Has the permittee closed the facility in accordance with the following: _____
- b. Has the permittee amended the closure plan in accordance with 264.112(b) whenever necessary? _____
- c. In accordance with 264.112(d)(1), will the permittee notify the Department at least 45 days prior to the date he expects to begin closure of any units? _____
- d. Will the permittee notify the Department at least 135 days prior to the date he expects to begin closure and submit a complete closure permit application? _____
- e. Within 90 days after receiving the final volume of hazardous waste, will the permittee treat or remove from the site all of the hazardous waste in accordance with 264.113(a)? _____
- f. Will the permittee decontaminate and/or dispose of all facility equipment as required by 264.114, 264.178, 264.197? _____
- g. Will the permittee certify that the facility has been closed in accordance with 264.115? _____
2. Within 90 days of determining that all contaminated soils cannot be practically removed or decontaminated from the tank system, will the permittee submit a permit application to close the tank system(s) as a landfill and perform post-closure care as required by 264.310? _____

PART V - GENERAL

1. Have all submittals in response to this permit (except Specific Condition 18 Part I) been submitted in quadruplicate to the Hazardous Waste Supervisor in the Jacksonville office? X _____
2. Have all submittals modifying engineering features of the hazardous waste storage areas worded, signed and certified by a qualified, professional engineer registered in the State of Florida in accordance with rule 17-730.220(7) FAC? X _____
3. Has it been determined if hazardous waste applies to this facility? H5WA EPA

YES NO

If so, has the permit been modified to address the requirements of Section 3004(u) of HSWA or has EPA issued a Federal permit? _____

4. Before transferring ownership or operation of this facility during its operating life, will the permittee notify the new owner or operator in writing of the requirements of 40 CFR 264 and 17-730.900(2)?

Will the permittee submit an application for transfer of the permit on DEP Form 17-1.201(1) in accordance with 17-730.300 FAC? X _____

5. Has the Department modified, revoked, reissued or terminated for cause, this permit in accordance with the provisions of 17-730.290 FAC? X _____

Has the permittee submitted any subsequent revisions to the Department for departmental approval? _____ N/A _____

If these revisions constituted a major modification to the permit, did the permittee meet the requirements of 17-730.290 FAC? _____ N/A _____

6. Prior to 135 days before the expiration of this permit, will the permittee submit a complete application for renewal of the permit on forms and in a manner prescribed by the Department, unless the facility is to be closed prior to the expiration date of this permit per the requirements of 17-730.300(1)? X _____

FIGURE II.B.5-1

INSPECTION LOG SHEET FOR
DAILY INSPECTION OF GATES AND LOCKS

Check all gates and locks for security, sticking, corrosion, lack of warning signs, or uncommon activity.

| Name | Date | Time | Status |
|------|------|------|--------|
| | | | |
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FIGURE II.B.5-2

INSPECTION LOG SHEET FOR:

Weekly Inspection of SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES
AND MISCELLANEOUS EQUIPMENT

INSPECTOR'S NAME/TITLE _____

INSPECTOR'S SIGNATURE: _____

(SIGN ON THE DAY INSPECTION IS PERFORMED; PERFORM INSPECTION ON THE SAME DAY EVERY WEEK.)

| MONDAY | TUESDAY | WEDNESDAY | THURSDAY | FRIDAY |
|--------|---------|-----------|----------|--------|
| | | | | |

DATE: (M / D / Y)

TIME

SAFETY AND EMERGENCY EQUIPMENT

Fire Extinguishers:

A N

If 'N', circle appropriate problem: overdue inspection, inadequately charged, inaccessible, other: _____

Eyewash and Shower:

A N

If 'N', circle appropriate problem: disconnected or malfunctioning valves, inadequate pressure, inaccessible, malfunctioning drain, leaking, other: _____

First Aid Kit:

A N

If 'N', circle appropriate problem: inadequate inventory, other: _____

Spill Cleanup Equipment:

A N

If 'N', circle appropriate problem: inadequate supply of sorbent, towels and/or clay, inadequate supply of shovels, mops, empty drums, wet/dry vacuum, other: _____

Personal Protection Equipment:

A N

If 'N', circle appropriate problem: inadequate supply of malfunctioning or inadequate aprons, gloves, glasses, respirators, emergency respirators, emergency respirator is missing components, items requiring security or clean environment are exposed to the environment, other: _____

Communication Devices:

A N

If 'N', circle appropriate problem: inadequate supply of telephones, malfunctioning telephone(s), malfunctioning intercom, emergency alarm does not work, telephones are not located where needed, other: _____

SECURITY DEVICES

Gates and Locks:

A N

If 'N', circle appropriate problem: sticking, corrosion, lack of warning signs, fit, other: _____

Fence:

A N

If 'N', circle appropriate problem: broken ties, corrosion, holes, distortion, other: _____

MISCELLANEOUS EQUIPMENT

Dry Dumpster:

A N

If 'N', circle appropriate problem: rust, corrosion, split seams, distortion, deterioration, excess debris, liquids in unit, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* A = Acceptable

N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

FIGURE II.B.5-3

INSPECTION LOG SHEET FOR:

D. Inspection of **CONTAINER STORAGE A**
(A separate log must be completed for each storage area.)

DESCRIPTION OF AREA (e.g., metal shelter, northeast corner of warehouse, etc.) _____

PERMITTED STORAGE VOLUME _____

INSPECTOR'S NAME/TITLE _____

| INSPECTOR'S SIGNATURE: | | | | |
|------------------------|---------|-----------|----------|--------|
| MONDAY | TUESDAY | WEDNESDAY | THURSDAY | FRIDAY |
| | | | | |

DATE: (M / D / Y)

TIME

| CONTAINERS | MON. | TUES. | WED. | THURS. | FRI. |
|----------------------------------|------|-------|------|--------|------|
| Total Volume* of _____ ** waste: | | | | | |
| Total Volume of _____ ** waste: | | | | | |
| Total Volume of _____ ** waste: | | | | | |
| Total Volume of _____ ** waste: | | | | | |
| Total Volume of _____ : | | | | | |
| TOTAL VOLUME (IN GALLONS): | | | | | |

A***N A N A N A N A N

If 'N', circle appropriate problem: Total volume exceeds the amount for which the facility is permitted,
other: _____

Condition of Containers: A N A N A N A N A N

If 'N', circle appropriate problem: missing or loose lids, missing, incorrect or incomplete labels, rust, leaks, distortion,
other: _____

Stacking/Placement/Aisle Space: A N A N A N A N A N

If 'N', circle appropriate problem: different from Part B Floor Plan, containers not on pallets, unstable stacks, broken or damaged
pallets, other: _____

CONTAINMENT

Curbing, Floor and Sump(s): A N A N A N A N A N

(Any material which spills, leaks or otherwise accumulates in the secondary containment must be completely removed within 24 hours
of it being discovered.)

If 'N', circle appropriate problem: ponding/wet spots, deterioration (cracks, gaps, etc.), displacement, leaks, inadequate sealant,
other: _____

Loading/Unloading Area: A N A N A N A N A N

If 'N', circle appropriate problem: cracks, deterioration, ponding/wet spots, other: _____

OBSERVATIONS, COMMENTS, DATE AND NATURE OF REPAIRS OF ANY ITEMS INDICATED AS "NOT ACCEPTABLE": _____

* When calculating total volumes, assume the containers are full.

** Enter a short description of the waste (e.g., M.S., I.C., paint, etc.) _____

*** A = Acceptable N = Not Acceptable

(IF AN ITEM IS NOT APPLICABLE, ENTER 'N/A' AFTER IT AND DRAW A LINE THROUGH THE 'ACCEPTABLE/NOT ACCEPTABLE' ROW)

Date 11/14 & 15/94
Inspector Cates / Fellabaum
Facility ID# FL0980847214

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: Roy Stewart - Branch Manager
3. Survey Participants: Kevin Hamilton - SK, K. Cates - FOEP, P. Fellabaum, FOEP

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)? Filters ☒ Yes ☐ No
 - a. If yes, list wastes, EPA numbers and quantities. Perc & Sludge - F002
Paint thinner F005/F003
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. point thinner D1/D8/D18/D35/D39/D40
IM Cleaner - D6/D8/D21/D27/D35/D39/D40/D18
Dumpster mud - D1/D4/D8/D18/D39 mineral spirits D1/D6/D8/D18/D35
Dumpster mud - D39/D40
 - b. Does generator determine characteristics by testing, 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.)

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)

X Yes ___ No

a. If no, do not fill out Section C and D.

b. If yes, identify primary off-site facilities.
List facilities in narrative report.

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

X Yes ___ No
X 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.

X Yes ___ No

b. Manifest Document No.

___ Yes ___ No

c. Generator's Name, Mailing Address, Telephone No.

___ Yes ___ No

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

___ Yes ___ No

e. Facility Name, Address, EPA I.D. No., Telephone No.

___ Yes ___ No

f. DOT description of the waste

___ Yes ___ No

g. (1) Containers (number and type)

___ Yes ___ No

(2) Quantity (weight or volume)

X Yes ___ No

h. EPA waste no.

X Yes X No *See Report*

i. Emergency Information (optional)
(Special handling instructions, Phone No.)

X Yes ___ No

j. Is the following certification on each manifest form?

X 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.

~ 50
see report

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

N/A
___ Yes ___ No

If yes, did it contain the following information?
Legible copy of manifest

___ Yes ___ No

AND

Cover letter explaining generators efforts to locate waste.

___ Yes ___ No

- n. Does (will) generator retain copies for 3 years?

☒ Yes ___ No

Section D - Pre-Transport Requirements (262.30-262.34)

___ N/A

1. Does generator package waste for transport?

☒ Yes ___ No

If no, skip to question 8.

If yes, complete the following questions.

2. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT Requirements)? (262.30 - Packaging)

☒ Yes ___ No

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? (262.31 - Labeling) ☒ Yes ___ No
5. Does the generator mark each package in accordance with 49 CFR 172? (262.32 - Marking) ☒ Yes ___ No
6. Is each container of 110 gallons or less marked with the following label? (262.32 - Marking) ☒ Yes ___ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

Manifest Document Number _____

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet. (262.33 - Placarding)
- a. Does the generator have the appropriate placards to offer the initial transporter? ☒ Yes ___ No
- b. If no, who provides placards? _____
8. Accumulation Time (262.34 - Accumulation Time)
- a. Is facility a permitted storage facility?
If yes, skip to question #9. ☒ Yes ___ No
- If no, answer rest of question #8.
- b. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) ___ Yes ___ No
- If no, has the generator been granted a 30-day extension? (262.34(b)) ___ Yes ___ No
- If yes, explain the unforeseen/uncontrollable circumstances in the narrative.

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

☒ Yes ☐ No

If yes, complete Container Storage Checklist for Generators.

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

☒ Yes ☐ No

d. Are tanks used to store wastes? (262.34(a)(1))

☒ Yes ☐ No

If yes, complete Tanks Checklist for Generators.

e. While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3))

☒ Yes ☐ No

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. *See report*

Section E - Recordkeeping and Records (262.40-262.43)

☐ N/A

Explain _____

2. 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).

N/A
☐ 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 *Roy Stewart* Title _____

4. Any additional reporting? (262.43 - Additional Reporting)

N/A
☐ Yes ☐ No

Section F - Special Condition (262.50 - International Shipments)

☐ Yes ☒ No

Explain _____

DATE _____
FACILITY ID _____

1. Has generator received from, or transported to, a foreign source, any hazardous waste? ☐ Yes ☐ No
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No
- b. Is this waste manifested and signed by Foreign consignee? ☐ Yes ☐ No
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No

Appendix A

Section A - Personnel Training (265.16)

1. Do management personnel complete hazardous waste training? ☐ Yes ☐ No
- a. Is training on-the-job? ☐ Yes ☐ No
- b. Is training in the classroom? ☐ Yes ☐ No
2. Do laborers who handle hazardous waste complete training? ☐ Yes ☐ No
- a. Is training on-the-job? ☐ Yes ☐ No
- b. Is training in the classroom? ☐ Yes ☐ No
3. Does training include:
- a. Emergency response procedures? ☐ Yes ☐ No
- b. Inspection procedures? ☐ Yes ☐ No
- c. Operation of hazardous waste handling equipment? ☐ Yes ☐ No
4. How often is training reviewed? _____
5. Does the facility have personnel training records including:
- a. Job title and description of position? ☐ Yes ☐ No
- b. Description of employee's training? ☐ Yes ☐ No
6. Are records maintained for three years? ☐ Yes ☐ No

See permit check list

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 X No
If yes, use narrative explanation.
2. Is the facility equipped with (265.32 - Required equipment)
- a. Internal communications or alarm system? X Yes ____ No
Is it easily accessible in case of emergency? X Yes ____ No
- b. Telephone or two-way radio to call emergency response personnel? X Yes ____ No
- c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? X Yes ____ No
Is this equipment tested to assure its proper operation? X Yes ____ No
How frequently? weekly / as needed
- d. Water of adequate volume for hoses, sprinklers or water spray system? X 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) 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) X N/A ____ Yes ____ No
If yes, indicate primary authority _____
Is the fire department a city or volunteer fire department? _____

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)

N/A
☐ 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?
(2) Evacuation routes?
(3) Emergency equipment?
(4) Is the emergency equipment properly inspected and maintained?

☒ Yes ☐ No

☒ Yes ☐ No

☒ Yes ☐ No

☒ 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?

Roy Stewart

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 11/14/94
Inspector CATES/Fellabaum
Facility ID# FLD980847214

TRANSPORTERS CHECKLIST

I. SITE NAME: Safety KLEEN

II. TRANSPORTER REQUIREMENTS (40 CFR 263)

1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500) ☒ Yes ☐ No
 2. Does transporter have an EPA identification number? (263.11(a)) ☒ Yes ☐ No
 3. Does the transporter use manifest system as required by 263.20? ☒ Yes ☐ No
- Do the manifests contain at least:
- a. Name, address, and EPA ID of transporter? ☒ 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

DATE _____
FACILITY ID _____

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>X</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> </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 ~~263~~ 430.170(2) 62 Tally Yes No
9. Does the transporter verify financial responsibility with the Department annually (~~263~~ 730.170(3))? 62 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? X Yes ___ No
- b. Are signs posted and legible for 25 feet? X Yes ___ No

2. Inspection Requirement (265.15)

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

3. Personnel Training (265.16)

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

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? monthly, as needed

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. _____

DATE _____
FACILITY ID _____

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) ☒ 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? _____

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) ☒ 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?

8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37 - Arrangements with Local Authorities) ☒ N/A ___ 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? Roy Stewart
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 X No

If yes, explain using narrative.

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

X 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)

X Yes No

If yes, explain using narrative.

7. Are incompatible wastes stored in the same containers?

 Yes X No

If yes, explain using narrative.

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

X 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))
62

X 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))~~

X Yes No

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

X Yes No

Does the log contain:

Generators' names?

Manifest numbers?

Dates when waste enters and leaves facility?

X Yes No
X Yes X No
X Yes No *see report*

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?

N/A
_____ 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 _____

Date 11/14/94
Inspector CATES & Fellobaum
Facility ID# FL0980847214

TSD CONTAINERS CHECKLIST (264.170-264.178)

264____ Permit Condition____

1. Are the containers in good condition (264.171)? ☒ Yes ___ No
2. Are the containers managed in accordance with the permit (264.171)? ☒ Yes ___ No
3. Is the number of containers equal to or below the max inventory for the permit? ☒ Yes ___ No
4. Are the containers in the designated bays by waste type? ☒ Yes ___ No
5. Is the waste stored in the specified container? ☒ Yes ___ No
6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak (264.173(b))? ___ Yes ☒ No

Explain.

7. Are each of the containers inspected at least weekly (264.174)? ☒ Yes ___ No
8. Is the secondary containment system functional and are free liquids removed and managed in accordance with the permit? ☒ Yes ___ No
9. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? ☒ Yes ___ No
10. Is there sufficient aisle space to allow unobstructed movement and inspection? ☒ Yes ___ No

11. Specific Condition on Permit:

___ Yes ___ No
___ Yes ___ No
___ Yes ___ No

RCRA INSPECTION REPORT
LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility ID# FLD980847214 Date of Inspection: 11/14/94 & 11/15/94

Facility Name: Safety-Kleen

Facility Address: 161 Industrial Loop Dr. South
Orange Park, FL 32073

Facility Phone #: 904 264-2607 Facility Contact: Roy Stewart

Contact's Title: Branch Manager

Persons present for Inspection: Kerin Hamilton, SK

Karen Cates, FDEP

Pam Fellabaum, FDEP

Date and Time Inspection Began: 11/14/94 9:00 Am

Date and Time Inspection Ended: 11/15/94 5:00 pm

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

D1/D6/D8/D18/D35/D39/D40 → mineral spirits → SK - South Carolina

D6/D8/D18/D21/D27/D35/D39/D40 IC → SK south Carolina

(also
F1/F2/F3
FS) D1/D6/D8/D18/D39 Barrel washer sludge → SK

D1/D8/D18/D35/D39/D40/F3/FS w. paint → SK

F2/D7/D39 Arc Sludge → SK

F2/D39 Arc filters → SK

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]

No - See Report

(c) Is the generator storing restricted waste on site?

yes

Is the generator complying with 268.50?

See report

Is the generator complying with 262.34 as required by 268.50(a)(1)?

yes

Are the wastes identified correctly?

NO - See report

Revision #1
Date 3-12-91

Have LDR wastes been stored over 90 days (generator)?

NO

If the facility is a TSD and has been storing LDR wastes for over a year, can the TSD prove (if challenged) that the reason for such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal?

N/A

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

N/A

II. Waste with Treatment Standards

(a) Do the Notifications required by 268.7 include:

EPA Hazardous Waste #: No - See report

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: See report

Certification Statement if Generator is Claiming to meet Treatment standards: N/A

Revision #1
Date 3-12-91

Date Waste is Subject to Prohibitions if

Subject to a Case-By Case Extension or Variance: N/A

III. Does the generator maintain the above records on-site for five (5) years?

See report

IV. Additional Notes and Comments:

(Check for soft hammer compliance prior to May 8, 1990.)

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Date 3-12-91