

HAZARDOUS WASTE SITE INSPECTION
EXIT INTERVIEW SUMMARY

FACILITY: Safety - Kleen
I.D. NUMBER: FLS 980847214 DATE: 10/12/90 TIME: 5:10 PM
INTERVIEW PARTICIPANTS: Pamella Fellabaum, Paul Johnson
Andy Gough

This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-30, which adopts Federal Regulation 40 CFR Parts 260-266 by reference. It is possible that the list of violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the investigator will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

- ☐ 1. Hazardous Waste Determination (262.11).
- ☐ 2. Hazardous Waste Notification (262.12 or 263.11 or 264/265.11)
- ☐ 3. Manifest Deficiencies or Recordkeeping and Reporting (262 Subpart B and D or 263 Subpart B or 264/263 Subpart E).
- ☐ 4. Personnel Training [265.16 (262.34(d) for SQG) or 264.16].
- ☐ 5. Contingency Plan [265 Subpart D (262.34(d) for SQG) or 254 Subpart D].
- ☐ 6. Preparedness and Prevention (265 Subpart C or 264 Subpart C).
- ☐ 7. Container Requirements (262.34 or 264/265 Subpart I).
- ☐ 8. Tank Requirements (262.34 or 264/265 Subpart J).
- ☐ 9. Operating a treatment, storage or disposal facility without a permit (403.722 F.S., F.A.C. 17-30, Section IV).
- ☐ 10. Security Requirements (264/265.14).
- ☐ 11. Groundwater Monitoring (264/265 Subpart F).
- ☐ 12. Closure/Post-closure (264/265 Subpart G).
- ☐ 13. Failure to comply with the provisions of a Department Issued Permit or with the provisions of the Consent Order.
- ☐ 14. Other _____

COMMENTS: _____

DER INSPECTOR SIGNATURE: Pamella Fellabaum

FACILITY PARTICIPANT SIGNATURE: Paul Johnson

NOTE: BY SIGNING THIS FORM THE FACILITY PARTICIPANT IS ONLY INDICATING THAT THIS FORM HAS BEEN RECEIVED. THIS IS NOT AN ADMISSION THAT THE CITED PROVISIONS HAVE BEEN VIOLATED.

Specific Conditions

| | <u>Yes</u> | <u>No</u> |
|--|------------|-----------|
| 19. Are only those wastes stated in the waste analysis plan being stored at the facility? | | |
| - immersion cleaner (F002/F004) | <u>X</u> | — |
| - mineral spirits sludge (D001 and possibly D006 and/or D008) | — | — |
| - perchloroethylene (F002) | — | — |
| <i>F003/F005 only in Transfer Facility Area</i> | | |
| 20. Has the facility followed the procedures in the waste analysis plan? | | |
| - customers' process reviewed? | <u>X</u> | — |
| - contents of drums verified when serviced? | <u>X</u> | — |
| - drums kept closed until they reach the recycle center? | <u>X</u> | — |
| (recycle centers conduct waste analyses) | | |
| 21. Does the facility comply with the security provisions in 264.14(b)(2) and (c)? | | |
| - fence and gates? | <u>X</u> | — |
| - signs with the legend "Danger Unauthorized Personnel - Keep Out"? | <u>X</u> | — |
| 22. a. Are fire extinguishers inspected weekly by the permittee and annually by a fire service supplier? | <u>X</u> | — |
| b. Are the eye wash stand, first aid kit, spill control and personnel protective equipment inspected weekly? | <u>X</u> | — |
| 23. a. Are personnel trained within six months of employment? | <u>X</u> | — |
| b. Has training been documented? | <u>X</u> | — |
| c. Is training reviewed annually? | <u>X</u> | — |
| <i>last annual training 11/89</i> | | |
| 24. a. Are "No Smoking" signs conspicuously placed wherever there is a hazard from ignitable waste? | <u>X</u> | — |

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

EXHIBIT I.E.2-10
EMERGENCY RESPONSE EQUIPMENT

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

| | | Yes | No |
|-----|--|------------|----------|
| 25. | b. Is it tested and maintained to assure its proper operation? | <u>✓</u> | — |
| | How often? <u>as needed, weekly</u> | | |
| | c. Is access maintained to communication or alarm system? | <u>X</u> | — |
| | d. Is aisle space maintained? | <u>X</u> | — |
| | e. Has facility made arrangements with local authorities? | <u>X</u> | — |
| 26. | a. Has the contingency plan ever been implemented? | — | <u>X</u> |
| | If so, was it reported? | <u>not</u> | — |
| | b. Has the plan been provided to the local authorities? | <u>X</u> | — |
| | c. Has the plan ever been amended? | — | <u>X</u> |
| | If so, were amendments provided to the local authorities? | <u>NA</u> | — |
| | d. Who is the emergency coordinator? | | |
| | <u>Paul Johnson</u> | | |
| | Is he familiar with <u>all</u> aspects of the facility? | <u>X</u> | — |
| 27. | Does the permittee comply with the manifest requirements? | <u>X</u> | — |
| 28. | Does the facility's operating record include the following: | | |
| | - the description and quantity of each hazardous waste received? | <u>X</u> | — |
| | - the location of each hazardous waste within the facility, and the quantity at each location? | <u>X</u> | — |
| | - the results of the waste analysis? | <u>X</u> | — |
| | - a summary report and details of incidents that require implementation of the contingency plan? | <u>NA</u> | — |
| | - manifest numbers? | <u>X</u> | — |
| | - notices to generators as specified in 40 CFR 264.12? | <u>X</u> | — |

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

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

Yes No

39. Does the tank system meet the requirements for secondary containment found in 40 CFR 264.193?

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a. If no, has it been determined that the tank system is not leaking or unfit for use by obtaining and keeping on file at the facility, a written assessment reviewed and certified by an independent registered professional engineer that attests to the tank's integrity by January 12, 1988, and biannually thereafter?

NA

b. Does the assessment consider:

(1) design standards, if applicable, to which the tank and ancillary equipment were constructed?

(2) hazardous characteristics of the waste which has been handled and will be handled?

(3) existing corrosion protection?

(4) documentation of the tank age, if it exists?

(5) results of leak tests, internal inspection or other tank integrity examinations?

c. If the assessments conducted above, indicate the tank system is leaking or unfit for use, were the requirements of Specific Condition 44 met?

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40. For new tank components which may be required by the repair options of Specific Condition 44, will a written assessment reviewed and certified by an independent professional engineer, which attests to the components' structural integrity, be submitted to the Department?

NA

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41. In order to prevent the release of hazardous waste or hazardous constituents to the environment, have or will the following requirements pertaining to secondary containment be complied with?

a. Will all new components have secondary containment pursuant to part (c) of this condition prior to being put into service?

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

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

- | | | Yes | No |
|-----|--|------------------------|----------|
| 45. | b. developed a contingent post-closure plan for complying with 40 CFR 264.197(b)? | <u>NA</u> X | — |
| | c. calculated closure cost estimates for complying with the closure/post-closure contingent plans called for in (a) and (b) of this condition? | <u>3</u> X | — |
| | d. based on financial assurance on the cost estimates of the closure plan or the closure/post-closure contingent plan? (whichever is greater) | — | — |
| | e. considered for the purposes of the contingent closure and post-closure plans, the tank system to be a landfill? | — | — |
| | Was the information submitted to the Department within 60 days of the issuance of this permit? | — | — |
| 46. | Has permittee met the conditions of 40 CFR 264.198(a) before placing ignitable or reactive wastes in tank systems? | <u>✓</u> | — |
| | If so, how? _____ | | |
| 47. | Has the permittee complied with the protective distance requirements for tank placement as set forth in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? [40 CFR 264.198(b)] | <u>✓</u> | — |
| 48. | Has the permittee introduced hazardous waste into an unwashed tank system which previously held incompatible waste or material? | — | <u>✓</u> |