Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			A. GENERAL INFORMATION 122.6(a) & (b) 122.4(d) 122.24			
✓	✓		A-1 Type of Facility	Container Storage Facility	INTRODUCTION PAGE 6	
	✓		A-2 Type of Application	Operation		
✓	✓		A-3 Date Operation Began			
✓	✓		A-4 Facility Name	SAFETY KLEEN		
✓	✓		A-5 EPA/DER I.D. Number	FLD 980 847 214		
✓	✓		A-6 Facility Location			
✓	✓		A-7 Facility Mailing Address			
✓ ✓ ✓ ✓	✓ ✓ ✓ ✓		A-8 Facility Contact - Name - Phone - Title - Address	Stan Walczynski		
✓	✓		A-9 Operator's Name			
✓	✓		A-10 Operator's Address			
✓	✓		A-11 Facility Owner's Name			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		A-12 Facility Owner's Address		INTRO. PAGE 6	
✓	✓		A-13 Legal Structure			
		✓	A-14 County-State Registration	N/A		
✓	✓		A-15 State of Incorporation			
		✓	A-16 Partnership Owners - Names - Addresses	NOT APP.		
✓	✓		A-17 Site Ownership Status - Land owner's name - Land owner's address	LAND PRESENTLY LEASED — provide EXPIRATION date		8-11 86
		✓	A-18 Engineer - Name - Registration number - Address - Association	PROVIDE ENGINEERS NAME		8-11 86
✓	✓		A-19 Indian Land			
✓	✓		A-20 Existing Environmental Permits			

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			B. SITE INFORMATION		INTRO.	
✓	✓		B.1 Facility Location 122.24(a)		PAGE 6	
✓	✓		- County	Clay County		
✓	✓		- Nearest community			
✓	✓		- Latitude			
✓	✓		- Longitude			
✓	✓		B-2 Area of Facility Site 122.4(d)(7)	1 acre		
			B-3 Maps 122.25(a)(19); 122.4(d)(7)		PART I	
✓			Map or Aerial Photo (1:2,000)		Attachment I.B.3.	8-11-86
		✓	- Map scale & date			
		✓	- 100 year floodplain area			
		✓	- Orientation of map	Not completed		
		✓	- Surface waters (1/4 mile) (intermittant stream & springs)			
		✓	- Surrounding land uses			
		✓	- Legal boundaries of facility			
		✓	- Injection wells used by facility (1 mile)			
		✓	- Drinking water wells (1/4 mile)			
		✓	- Intake and discharge structures (1 mile)			
✓			Wind rose	→ PROVIDE clear copy		
✓			Topographic Map (1:200)	NOT complete		
			- Map scale & date			
			- 100 year floodplain area			
			- Orientation of map			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-3 - Access control - Injection and withdrawal wells - Buildings and other structures (roads, sewers, fire control) - Contours sufficient to show surface water flow (where applicable) - Loading and unloading areas - Drainage or flood control barriers - Hazardous waste units including cleanup areas - Run off control systems.	Not Submitted	Part I Attachment I.B.3	8-1 86
			B-4 Flood Plain 122.25(a)(11)(iii); 264.18(b) Documentation of whether or not the facility is located within a 100-yr floodplain including the source of data (Federal Insurance Administration Map or other maps and calculations.) If map other than FIA map is used demonstration of equivalent mapping technique should be provided. If located in 100-yr floodplain include: - 100-yr floodplain level (MSL) - Other special flooding factors (e.g. wave action that must be considered to prevent washout)	PROVIDE MAPS According to U.S.G.S. Flood Prone map facility may be in 100 year Flood area.	Attachment I.B.4	8-1 86
			122.25(a)(11)(iv); 264.18(b) For facilities located within the 100-yr floodplain, a description of how			

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			B-4 the facility is designed, constructed, operated, and maintained to prevent washout of any hazardous waste during a flood. Either of the following may be used: (a) Flood Proofing and Flood Protection 122.25(a)(11)(iv)(A) & (b) A structural or other engineering study showing how design of the hazardous waste units and the flood proofing and protection devices at the facility will prevent washout. - Engineering analysis of hydrodynamic and hydrostatic forces - Structural or other engineering studies of hazardous waste units and flood protection devices - Calculations included.	(FACILITY) Will provide maps to show it is not in 100 yr flood plain		B-11 Bk
			OR (b) Flood Plan 122.25(a)(11)(iv)(C) Description of the procedures to be followed to remove hazardous waste to safety before the facility is flooded, including: - Timing related to flood levels - Estimated time to move the waste			

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			B-4 - The location to which the waste will be moved - Procedures, equipment and personnel to be used and the means to ensure that these resources will be available - Potential for accidental discharge during movement of the waste - Demonstration that those facilities will be eligible and capable to receive hazardous waste. - Include a copy of agreement.			
✓	✓		C. LAND USE INFORMATION C-1 Zoning		INTRO. PAGE 7	
		✓	C-2 Zoning Changes	N/A ?		
✓	✓		C-3 Present Land Use			
✓	✓		D. OPERATING INFORMATION D-1 Waste Generated on Site 122.4(d)(3) - SIC code(s)		PAGE 7	
✓ ✓ ✓	✓ ✓ ✓		D-2 Description of Operation 122.24(f)&(g) - EPA hazardous waste numbers - Estimated annual quantity - Unit of measure	D001, D008, F002, F003, F004, F005 PART A Application	PART I Attachment I.A.2c	

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		D-2 - Process code - Process description - Process design capacities with units of measurement - Calculations		Attachment I.A.20 I.D.2 Part I	
			* D-3 Chemical and Physical Analysis 122.25(a)(2) 264.13(a) For each hazardous waste treated, stored or disposed at the facility, the following information should be provided: 122.27(b)(2)(ii)(A)		Attachment I.D.2	
✓	✓		- General source and description of the waste			
✓	✓		- Hazardous characteristics			
✓	✓		- Basis for hazard designation			8-11 86
✓			- Laboratory data on analyses results	NOT completed; provide analysis of mineral spirits sludge Pb — Cr		
✓	✓		- Existing published or documented data on hazardous waste or hazardous waste from a similar process			
			At a minimum, the analyses should include all the information which must be known to treat, store or dispose of the waste in accordance with the regulatory requirements.			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
X	X		* D-4 Waste Analysis Plan Waste Analysis Plan 122.25(a)(3) 264.13(b) & (c) The Waste Analysis Plan should describe the procedures used to obtain chemical and physical information and data on the wastes to insure proper storage, treatment and disposal.		Attachment I. D. 4	
X	X		* - Parameters and Rationale 264.13(b)(1) 264.341 A list of parameters chosen for analysis and an explanation of the rationale for their selection.	PROVIDE specific VOC parameters to be analyzed for; and test method		8-11 86
X			* - Test Methods 264.13(b)(2) A description of the test methods used to test for parameters chosen (EPA or equivalent method).			
X			* - Sampling Methods 264.13(b)(3) 261, Appendix I A list of the sampling methods used to obtain a representative sample of each waste to be analyzed (EPA or equivalent method).	Not Complete Provide procedures		

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		D-4 * - Frequency of Analysis 264.13(b)(4) A description of the frequency at which the analyses will be repeated. For an on-site facility this will be whenever there is a process change or as often as required to verify consistency of the waste load.		Attachment I-D-4	
			* - Additional Requirements for Wastes Generated Offsite 264.13(b)(5) 264.13(c) A description of the procedures used to inspect and/or analyze wastes generated offsite that includes procedures to determine their identity and sampling methods used. Also information supplied by the generator.	N/A		
			* - Additional Requirements for Facilities Handling Ignitable, Reactive, or Incompatible Wastes 264.13(b)(6) 264.17 If the facility stores or treats ignitible, reactive, or incompatible waste, a description of methods which will be used to meet the additional waste analysis requirements necessary for complying with the regulatory	N/A		

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			D-4 requirements for these types of hazardous waste.			
✓	✓	✓	D-5 Location of TDS Areas 122.24(d) 122.25(a)(10) - Past, present, future areas - Traffic patterns - Estimated volume - Traffic pattern - Traffic control - Access Roads - Load-bearing capacity and road surfacing	NOT SUBmitted	Attachment I.D.5	8-86
✓			* D-6 Manifest System, Record Keeping, and Reporting 264.12; 264.71; 264.72; 264.73; 264.74; 264.75; 264.76; 264.77; - Required notices - Manifest system - Operating records - Records retention - Annual reports - Unmanifested waste reports - Additional reports	NOT completed describe in detail the manifest system all other items should be responded to	Attachment I.D.6	8-86

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.		Comments	Location in Application	Due Date
			E. FACILITY SECURITY INFORMATION * E-1 Security			Attachment I.E. 1	
L			* Security Procedures and Equipment 264.14 122.25(a)(4) Unless a waiver is granted, the facility must demonstrate the following: - 24-Hour Surveillance System 264.14(b)(1) A 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) that continuously monitors and controls entry onto the active portion of the facility; OR * - Barrier and Means to Control Entry 264.14(b)(2)(1) Barrier An artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff) that completely surrounds the active portion of the facility; - Height - Material of construction AND		Not completed No security available for tanks area; facility is completed enclosed		

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓			E-1 * - Means to Control Entry 264.14(b)(2)(ii) A means to control entry, at all times, through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility.)	Not completed	I.E-1a	
✓	✓		* - Warning Signs 264.14(c) The facility must have a sign with the legend "Danger - Unauthorized Personnel Keep Out", which must be posted at each entrance to the active portion of the facility and at other locations, in sufficient numbers to be seen from any approach to this active portion. The legend must be written in English and in any other language predominant in the area surrounding the facility and must be legible from a distance of at least 25 ft. Existing signs with a legend other than "Danger - Unauthorized Personnel Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			E-1 and that entry onto the active portion can be dangerous.			
			* Waiver 264.14(c) If a waiver of these requirements is requested, the owner or operator must demonstrate the following: - Injury to Intruder 264.14(a)(1) Physical contact with the waste, structure, or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock that may enter the active portion of a facility; AND - Violation Caused by Intruder 264.14(a)(2) Disturbance of the waste or equipment by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility will not cause a violation of the requirements of 40 CFR Part 264.		

* This standard is substantially identical to the corresponding 40 CFR Part 265 standard.

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓			* 122.25(a)(7) E-2 Contingency Plan 264.50 through 264.56 A copy of the Contingency Plan or Spill Prevention Control and Countermeasures (SPCC) Plan amended for hazardous waste management to describe the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, surface water, or ground water at the facility.		Attachment I.E.2	
✓			* - General Information 122.25(a)(7) 264.52 264.53 - Facility name and location and owner or operator name			8-11-86
✓		✓	- Site plan	submit site plan		
✓			- Description of facility operations			
✓	✓		* - Emergency Coordinators 264.52(d) 264.55 - Names, addresses, office and home phone numbers, and duties of primary and alternate coordinates	Primary Coordinator has temporary address. Holiday Inn		
✓	✓		- A statement authorizing designated coordinators to commit the necessary resources to implement the contingency plan			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		E-2 * - Implementation 264.52(a) 264.56(d) Criteria for implementation of contingency plan for any potential emergency.		I.E.2.c.	
✓	✓		* - Emergency Response Procedures 264.56(a) Notification 264.56(d)(1) 264.56(d)(2) Methodology for immediate notification of facility personnel and necessary state or local agencies.	Facility personnel through verbal communication	I.E.2.c. paragraph 1	
✓	✓		* Identification of Hazardous Materials 264.56(b) Available data and/or procedures for identification of hazardous materials involved in the emergency and quantity and areal extent of release. Include information on: - Biological, physical, and chemical properties of the waste - Exact source - Amount - Areal extent of release		I.E.2.c paragraph 2	

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			E-2			
✓	✓		* Hazard Assessment 264.56(c) & (d) - Procedure for assessment of possible hazards to the environment and human health - Procedure for determining the need for evacuation and notification of authorities.	uncontrollable by plant personnel I.E.2.d. Potential spill sources; did not include 15,000 Vertical tanks.	I.E.2.c. paragraphs a.-f. paragraph 4	
✓	✓		* Control Procedures 264.52(a) 122.27(b)(2)(ii)(G) - Specific responses and control procedures to be taken in the event of a fire, explosion, or release of hazardous waste to air, land, or water, including procedures for rapidly stopping waste feed.	SPILL CONTROL PROCEDURES ——> I.E.2.e FIRE CONTROL PROCEDURES ——> I.E.2.f		
		✓	* Prevention of Recurrence or Spread of Fires, Explosions, or Releases 264.56(e) (f) During an emergency situation, a description of the necessary steps to be taken to ensure that fires, explosions, or releases do not occur, recur, or spread to other hazardous	Safety Kleen should include a statement which will describe how they will prevent recurrence.		

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
	✓	✓	E-2 * waste at the facility. Steps should include: - Shut-down of processes and continued monitoring of them - Collecting, containing, and treating released wastes - Removing and isolating containers and - Proper use of fire control structures (e.g., fire doors), systems (e.g., sprinkler systems), and equipment (e.g., extinguishers)		Not Submitted	
		✓	* Storage and Treatment of Released Material 264.56(g) - Provisions for treatment, storage, or disposal of any hazardous waste resulting from a release, fire, or explosion at the facility - Equipment available and location - Procedures for deployment of these resources - Methods to contain, treat, and clean up a hazardous release and decontaminate the affected area			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			E-2			
✓	✓		* Incompatible Waste 264.56(h)(1) Provisions for prevention of incompatible waste from being treated, stored, or located in the affected areas until cleanup procedures are completed.		I.E.2.c. paragraph 8.	
✓	✓		* Post-Emergency Equipment Maintenance 264.56(h)(2) Procedures for ensuring that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.		I.E.2.c. paragraph 8	
✓	✓		* Container Spills and Leakage 264.171 Procedures for responding to container spills or leakage including removal of spilled waste and repair or replacement of containers.		I.E.2.e	
		✓	* Tank Spills and Leakage 264.194(c) Procedures for responding to tank spills or leakage including removal of spilled waste and repair of tank.	Not Submitted		

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			E-2 * Waste Pile Spills and Leakage 264.255 264.258 Upon indication of failure: - Inspection of containment system - Evaluation and repair plan techniques and schedule of actions for repair - Procedures to remove waste pile from service - Conditions to be met to return waste pile to service including containment system repair and certification by a qualified engineer - Closure of waste pile if not repaired	N/A		
			Surface Impoundments Spills and Leakage (Reserved)	N/A		
✓			* - Emergency Equipment 264.52(e) (Include on site plan) Location, description, and capabilities of emergency equipment. This should include: - Spill control equipment - Fire control equipment	Figure I.D.5-2 shows locations of Fire extinguishers, First Aid and telephone. It also indicates the location of the emergency equipment storage, they should provide a list of the emergency equipment located in storage. Provide a list of all emergency equipment and location in contingency plan. Exhibit I.E.4-2 should be included		
		✓				
✓						

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments Comments	Location in Application	Due Date
✓			E-2	PROVIDE EXHIBIT I.E.4-2.		
✓		✓	* - Personnel protective items such as respirators and protective clothing - First aid and medical supplies - Emergency decontamination equipment - Emergency communication and alarm systems	→ decontamination equipment + procedures	I.E.2.d paragraph 2.	
✓	✓					
✓	✓		* - Coordination Agreements 264.52(c) 264.37 - A description of coordination agreements with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of emergency	INCLude DEP	I.E.2.h.	
✓	✓		- A statement indicating that a copy of the contingency plan has been submitted to these organizations	ORANGE PARK FIRE DEPT., HUMANA HOSPITAL, Orange Park Police Dept.		
		✓	- If applicable, documentation of refusal to enter into a coordination agreement			
			* - Evacuation Plan 264.52(f) This plan must include:			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		E-2 * - Criteria for evacuation - A description of signal(s) to be used to begin evacuation, with primary and alternate evacuation routes, rally points	see I.E.2.c - paragraph 4 - a ← verbal communication	→ I.E.2.i	
			* - Required Reports 264.56(j)			
✓	✓		- Provisions for submission of reports of emergency incidents within 15 days of occurance		I.E.2.e paragraph 5	
✓	✓		- Notation of such incidents in the operating record identifying the time, date, and details of these emergency incidents			
			122.25(a)(8) E-3 Prevention Procedures, Structures, and Equipment		I.E.3.b.	
			A description of procedures, structures or equipment used at the facility for the following:			
✓	✓		122.25(a)(8)(i) - Prevention of hazards in unloading operations (e.g., use of ramps or special forklifts)	handle 15, 16 and 30 gallon drums by using dolleys, jib crane, pallet jack	paragraph 4	
✓	✓		122.25(a)(8)(ii) - Prevention of runoff from hazardous waste handling areas to other areas of the facility or environment, or prevention of flooding (e.g., berms, dikes, trenches)	Spill containment area, all wastes are compatible.	paragraph 3	

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
		✓	E-3 - Prevention of contamination of water supplies 122.25(a)(8)(iii)	PROVIDE STATEMENTS: ↑ NOT SUBMITTED ↓		
		✓	- Mitigation of effects of equipment failure and power outages 122.25(a)(8)(iv)			
		✓	- Prevention of undue exposure of personnel to hazardous waste (e.g., protective clothing) 122.25(a)(8)(v)			
			* Precautions to Prevent or Ignition or Reaction of Ignitable for Reactive Waste 122.25(a)(9) 264.17(a) A description of the precautions taken by a facility that handles ignitable or reactive waste to prevent actual ignition, including separation from sources of ignition such as open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical or mechanical), spontaneous ignition (e.g., heat producing chemical reactions), and radiant heat. Demonstration that when ignitable or reactive waste is being handled, the owner or operator confines smoking and open flames to specially designated locations. "No Smoking" signs must be conspicuously placed wherever a hazard exists from ignitable or reactive waste.	→ ?		

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		E-3 122.25(a)(9) * General Precautions for Handling 264.17(b) Ignitable or Reactive Waste and Mixing of Incompatible Waste A description of the precautions taken by a facility that treats, stores, or disposes of ignitable or reactive waste or incompatible waste and other materials, to prevent reactions which: (1) generate extreme heat or pressure, fire or explosions or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; or (5) by similar means threaten human health or the environment.	→ ? ok No incompatible wastes located at facility		
			E-4 Preparedness and Prevention Procedures Equipment Requirements 264.32 Demonstrate that none of the hazards posed by waste handled at the facility could require a particular kind of			

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			E-4 * equipment specified below.			
			OR* the facility must have the following equipment:			
✓	✓		* - Internal Communications 264.32(a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel.	Verbal		
✓	✓		* - External Communications 264.32(b) A device such as a telephone (immediately available at the scene of operations) or a handheld two-way radio, for summoning emergency assistance from local police departments, or state or local emergency response teams.	Telephone		
✓	✓		* - Emergency Equipment 264.32(c) - Fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals and portable fire extinguishers			
✓	✓		- Spill control equipment			
	✓		- Decontamination equipment	→ Describe decon equipment		

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✓	✓		E-4 * - Water for Fire Control 264.32(d) - Water at adequate volume and pressue to supply water hose streams, or - Foam-producing equipment; or - Automatic sprinklers or water spray systems	→ Provide a statement that water at adequate volume and pressure will be provided to local fire agencies.		
		✓	* Aisle Space Requirement 264.35 - Adequate aisle space available	Do they have adequate aisle space? What is it? NFPA		
			OR * - Demonstration that aisle space is not needed to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of facility operation in an emergency.	⇒ may demonstrate		
✓	✓		* E-5 Personnel Training 122.25(a)(12) 264.16 An outline of both the introductory and continuing training programs by owners or operators to prepare the personnel to operate and maintain the facility in a safe manner. Include a brief description of how training will be designed to meet actual job tasks. (Note: on-the-job training may be used to comply with these requirements.)			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓ ✓ ✓ ✓	✓ ✓ ✓	✓	E-5 * Job Titles and Duties 264.16(d)(1) 264.16(d)(2) For each employee whose position at the facility is related to hazardous waste management include: - Name - Job title - Job duties - Job description	No Names given	I.E.5.b.	
✓ ✓ ✓	✓ ✓ ✓		* Training Content, Frequency, and Techniques 264.16(d)(3) 264.16(c) In both introductory and continuing training (including an annual review of the initial training) for each employee describe: - Training content - Frequency of training - Technique(s) used in training		I.E.5.c	
✓ ✓	✓ ✓		* Training Director 264.16(a)(2) Demonstration that the program is directed by a person trained in hazardous waste management. - Credentials of training director		I.E.5.d	

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		E-5 264.16(a)(2) * Relevance of Training to Job Position A brief description of how instructions of facility personnel in hazardous waste management procedures (including contingency plan implementation) is relevant to their positions.		I.E.5.e	
✓	✓		* Training for Emergency Response 264.16(a)(3) Documentation that the training program trains facility personnel to respond effectively to emergencies and trains them to be familiar with emergency procedures, emergency equipment, and emergency systems, include where applicable: Procedures for Using, Inspecting, Repairing, and Replacing Facility Emergency and Monitoring Equipment Key Parameters for Automatic Waste Feed Cutoff Systems Some key parameters include: - Type of valve (e.g., diaphragm, solenoid, or fusible element) and how it basically operates		I.E.5.f	

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			E-5 * - Whether the valve fails in an open or closed position - Whether the valve is pneumatically, hydraulically, electrically, or in the case of fusible element, heat activated - Whether or not there is a manual override in case of valve failure and how to manually operate the valve - Conditions which activate waste feed cut-off	N/A		
✓	✓		* Communications or Alarm System		I.E.5.f	
✓	✓		* Response to Fires		"	
✓	✓		* Response to Ground Water Contamination Incidents		"	
✓	✓		* Shutdown of Operations		"	
✓	✓		* Implementation of Training Program 264.16(d)(4) 264.16(b) - Indication that training has been and will be successfully completed by facility personnel within six months of their employment or assignment to a facility, or transfer to a new position at a facility,		I.E.5.h	

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			E-5 * whichever is later. (Note: employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements.) - Records documenting that the required training has been given to and completed by facility personnel must be maintained	Did not provide records that existing personnel have completed the necessary training requirements	I.E.5.L	
✓			F. FINANCIAL RESPONSIBILITY INFORMATION F-1 Closure Cost Estimate 122.25(a)(15) 264.142 * A copy of the most recent closure cost estimate, calculated to cover the cost of closure when the cost would be the greatest. - Cost estimate - Fully loaded - No salvage credits - Current year costs - Cost adjusted annually	264.142 (b)(1) & (2)	I.F.1.e	
			Financial Assurance Mechanism for Closure 122.25(a)(15) A copy of the established financial assurance mechanism for facility			

* This standard is substantially identical to the corresponding 40 CFR Part 265 standard.

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			F-1 closure. The mechanism must be one of the following and include due dates and use standard wording.			
			- Closure Trust Fund 264.143(a) 264.143(a)(1) 264.143(a)(1) A copy of the closure trust fund agreement with the wording required in 264.151(a)(1) and a formal certification of acknowledgment. - Bank or approved institution - Mechanics - Pay-in period: life of permit - Annual payment; unfunded liability divided by years left in pay-in period - Release of trust assets in excess of total cost estimate - Reimbursement for authorized closure expenditures			
			- Surety Bond 264.143(b) 264.151(b) A surety bond from a federally acceptable surety company meeting one of the following requirements: - Surety bond guaranteeing payment into a closure fund. A copy of			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			F-1 the surety bond with the wording required in 264.151(b), a copy of the standby trust fund, and a written guarantee that the owner or operator will fund the standby fund at least 60 days before final closure begins and will provide alternate financial assurance if the bond is cancelled - Surety bond guaranteeing performance of closure. A copy of the 264.143(c) surety bond with the wording required in 264.151(c), guaranteeing that the owner or operator will perform closure according to the closure plan and the requirements of Subpart H (for new facilities only).	N/A		
			- Closure Letter of Credit 264.143(d) 264.151(d) A copy of a closure letter of credit with the wording required in 264.151(d). - Irrevocable letter of credit - At least one year period, automatic renewal - Standby trust fund - Amount reflects current cost estimate	N/A	Exhibit I F.1-1	

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			F-1 - Closure Insurance 264.143(e) To demonstrate that the owner or operator has closure insurance, he or she must submit to the Department 60 days before hazardous waste is received a certificate of insurance worded as specified in 264.151(e). - Noncancellable policy, automatic renewal - Insurer licensed or eligible surplus lines carrier - Certificate of insurance - Funds available whenever final closure occurs	N/A		
✓	✓		- Financial Test and Corporate Guarantee for Closure 264.143(f) 264.151(f) 264.151(h) To demonstrate that this test is met, an owner or operator must submit a letter signed by the company's chief financial officer that is worded as specified in 264.151(f) and meets the following criteria: - Tangible net worth $10 million	N/A	Exhibit I.F.1-1	
✓	✓					

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		F-1 - Tangible net worth 6 x all closure and post-closure costs - U.S. assets at least 90% of total assets or at least six times all closure and post-closure costs - Bond rating requirement or alternative application must include: - Copy of a report on the company's latest financial statements drafted by an independent certified public accountant (CPA) - Copy of a report from the owner's or operator's independent CPA to the owner or operator stating that he or she has examined the data in the letter from the chief financial officer and has found no reason to change any of the data - In lieu of the above items, the owner or operator may submit a corporate guarantee worded as required by 264.151(h). This guarantee provides that the guarantor, which must be the parent company of the owner or			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			F-1 operator, will perform final closure in accordance with the closure plan if the owner or operator fails to do so or will establish a closure trust fund for the owner or operator. A copy of these items should be submitted with the application for review by the permit writer.			
			- <u>Combinations</u> <u>Use of Multiple Financial Mechanisms</u> 264.143(g) A copy of a combination of trust fund agreements, surety bond guaranteeing payment into a closure trust fund or letters of credit, insurance, and state assumption of responsibility, which provide financial assurance for the amount of closure. Combined financial assurance must equal or exceed current cost estimate.			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			F-1 Use of Financial Mechanism for Multiple Facilities 264.143(h) A copy of a financial assurance mechanism for more than one facility, the EPA ID number, name, address, and amount of funds for closure assured by the mechanism. Total funding must exceed sum required for each facility considered separately. Financial test applies to sum of closure and post-closure costs for all facilities.			
			F-2 Post-Closure Cost Estimate (Reserved)			
			F-3 Liability 122.25(a)(17) 264.147 (a - d) Sudden Insurance 264.151 (g, i, and j) Hazardous waste treatment, storage, or disposal facilities must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences.			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			F-3 - Amount of at least $1 million per occurrence - An annual total of at least $2 million - A signed duplicate original of the Hazardous Waste Facility Liability Endorsement worded as specified in 264.151(i), or - A Certificate of Liability Insurance worded as specified in 264.151(j) - Insurance company licensed to operate in Florida			
			Nonsudden Insurance This applies to high risk storage facilities, surface impoundments, land disposal and land treatment. - At least $3 million per occurrence - An annual total of at least $6 million is required			
			Financial Test for Liability Insurance Owners or operators may meet liability insurance requirements by passing a financial test and submitting a certified document. - Letter from CFO [264.151(g)] - Auditor's report			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			F-3 - Auditor's opinion - Other information requested by the Department.			
			<u>Variance Procedures</u> Evaluation of degree and duration of risk sufficient to allow the Department to make a judgement on reduction of required liability. The financial responsibility levels specified above for liability insurance for sudden accidental occurrences may be adjusted downward if the owner or operator can prove to the Department that these levels are not consistent with the degree and duration of risk at the owner's or operator's facility. Conversely, the Department may adjust the levels of financial responsibility up or down, based on the Department's assessment of the degree and duration of risk associated with the facility.			
			<u>Certification</u>			

Check List for Review of Hazardous Waste Permit Application

Specific Process Section

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			PART II - CONTAINERS A. 40 CFR PART 265			
			B. 40 CFR PART 264			
		✓	B-1 (a) Containers Without Free Liquids Test for Free Liquids 122.25(b)(1)(ii)(A) For areas that store containers of wastes that do not contain free liquids, the test procedures and results or other documentation or information showing that the wastes do not contain free liquids.	Not Applicable		
✓	✓	✓ ✓	Container Storage Area Drainage 122.25(b)(1)(ii)(B) 264.175(c) The storage area must be sloped or otherwise designed to drain and remove liquid resulting from precipitation - Design drawing showing location of hazardous waste storage area - Description of stacking practices - Base slope - Drainage design and removal system including calclations	→	Part II II.B.1	B-11 86

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-1 (b) Containers With Free Liquids Secondary Containment System Design and Operation 122.25(b)(1) 264.175(b) A description of the design and operation of the container storage area containment systems, including calculations, showing: - Design drawing of containment system - Capacity of system to hold spills, leaks, precipitation - Dimensions - Location of storage areas - Liquid collection system and location of sump - Description of base grade and slope - Description of curbs, dikes, berms, ditches, and trenches			8-11-86
			Requirement for the Base to Contain Liquids 264.175(b)(1) The base under the containers must be free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-1(b) material is detected and removed. The applicant should address: - Construction and characteristics of base materials - Engineering evaluation of base structural integrity - Compatibility of base or liner with types of wastes stored	N/A		
		✓	- <u>Containment System Drainage</u> 122.25(b)(1)(i)(B) 264.175(b)(2) The base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids. For this requirement the applicant should address where applicable: - Describe handling and stacking practices - Grading of base - Drainage design and removal system so that standing liquid does not remain on base			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-1(b) after a leakage or precipitation event.			
✓			- Containment System Capacity 122.25(b)(1)(i)(C) 264.175(b)(3) The containment system must have sufficient capcity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Information (with calculations) that should be included to satisfy this requirement is: - Volume of largest container - Total volume of containers - Containment structure capacity - Capacity of run-off collection system - Geographic storm intensity/ frequency data	CALCULATIONS of CONTAINMENT SYSTEM	PART II II.B.1	8-11-86
			- Control of Run-on 122.25(b)(1)(i)(D) 264.175(b)(4) Run-on into the containment system must be prevented, unless the collection system has sufficient excess capacity in addition to that required in the above paragraph to contain any run-on that might enter the system. The			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-1(b) applicant should discuss structure used to control run-on such as: - Containment system auxiliary structures (curbs, dikes, etc.) - Engineering grading design - Collection and removal system design capacity with calculation - Potential run-on - Demonstration that system has adequate capacity to handle run-on from precipitation event in addition to 10% of the volume of containers or the largest container, whichever is greater.	N/A Building		
✓	✓		- Removal of Liquids from Containment System 122.25(b)(1)(i)(E) Spilled or leaked waste and accumulated precipitation must be removed from the sump of collection area in a timely manner to prevent overflow of the containment system. Information that should be included when describing removal of accumulated liquids is: - How liquids will be analyzed - Removal equipment and methods	Liquids → Pumps	Part II II-B.1	

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-1(b) (sump pump design, piping specifications, location, discharge point and capacity) - Management of accumulated liquid including prevention of overflow			
✓			* B-2 Ignitable or Reactive Wastes in Containers — 122.25(b)(1)(iii) 264.176 Sketches, drawings, or data demonstrating that containers of ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line.	Not completed Provide statement and clearly show on drawing		8-11 86
			* Incompatible Wastes in Containers — 122.25(b)(1)(iii) 264.177 - The procedures used to ensure that incompatible wastes and materials are not placed in the same container (unless 264.17(b) is complied with) or in an unwashed container that previously held incompatible waste. - Dikes, berms, walls, or other devices used to separate incompatible wastes in containers.	N/A		

* This standard is substantially identical to the corresponding 40 CFR Part 265 standard.

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			* 122.25(a)(9) B-3 General Precautions for Handling 264.17(b) Ignitable or Reactive Waste and Mixing of Incompatible Wastes A description of the precautions taken by a facility that treats, stores, or disposes of ignitable or reactive waste, or accidentally mixes incompatible waste or incompatible wastes and other materials, to prevent reactions which: (1) generate extreme heat or pressure, fire or explosions or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; (5) by similar means threaten human health or the environment.			
			* 122.25(b) B-4 Description of Containers (1)(i)(A) 264.171 & 264.172 A description of the facility's primary containment devices that includes basic design parameters,			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		B-4 * dimensions, material of construction, and compatibility of waste with containers. Information submitted should include: - Type of container(s) and construction material - Dimensions and usable volume - Liner specifications - Condition of containers - Manufacturer specifications - Determination of compatibility of wastes and containers with description of how compatibility is determined such as trial mixing of waste in containers.		I.E.3.(c) and II.B.1	
✓	✓	✓	* Container Management Practices 264.173 A description of container management practices: - Waste containers are always kept closed during storage, except when adding or removing waste. - Containers must not be stored in a manner that may cause them to rupture or leak. - Adequately separated for inspection - Aisle space		II.B.1	

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		B-4 * - Maximum number, height, volume, and types of containers in storage area - Locations of ignitable, reactive, or incompatible wastes - Machinery, equipment and procedures used to move containers.		I.E.3 II.B.1	
			* 122.25(a)(5) B-5 Inspection Schedule 264.15 264.15(a)&(b) General Inspection Requirements 264.33 A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment: - Monitoring equipment - Emergency and safety equipment - Security devices - Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.	high level alarm on tank	I.E.4.a	
✓	✓		* Types of Problems 264.15(b)(3) The schedule must identify the types of problems to look for during the inspection (e.g., leaks, deterioration, readings out		I.E.4.g	

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-5 of specified range, missing items or materials, inoperative equipment, etc.).			
✓			* Frequency of Inspection 264.15(b)(4) 264.347(3) A description of the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. All emergency waste feed cut-off valves must be inspected at least weekly to verify proper operation. All system alarms must also be tested daily.	Include; emergency comm. equip. storage area base portable pump pallets	I.E.4 Exhibit I.E.4.1	

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-5			
✓	✓		* Specific Process Inspection Requirements 122.25(a)(5) Container Inspection A description of the weekly inspection of containers and container storage areas for leaks in containers or deterioration of the containment system.	Exhibit E, Item 4		
✓	✓		* Remedial Action 264.15(c) 264.194(c) 264.255 Procedures for taking remedial actions when inspections reveal problems. (These may alternately be described in the contingency plan.)			
✓ ✓ ✓ ✓	✓ ✓ ✓ ✓		* Inspection Log 264.73(b)(5) 264.15(d) A description of the inspection log or summary including the following: - Dates and times of inspections - Name(s) of inspector(s) - Observations made - Date and nature of repairs or remedial actions.			

* This standard is substantially identical to the corresponding 40 CFR Part 265 standard.

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-6 Closure			
			* Closure Plans 122.25(a)(13) 264.112 A copy of the written closure plan consistent with the following items:	I.F.-19	Part I.F.1	
			Closure Performance Standard 264.111 A description of how closure			8-11 86
✓			- Minimizes the need for post-closure maintenance	→ N/A		
✓			- Minimizes releases of hazardous wastes, leachate, and contaminated rainfall to the air, groundwater, surface water, and surrounding land.			
			* Partial Closure and Final Closure Activities 264.112(a)(1)			
✓			If partial closure is anticipated, a description of how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure. Also, a description of how and when the facility will be finally closed.	Section I.F.1.a →		
✓	✓					

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-6			
✓	✓		* Maximum Waste Inventory 264.112(a)(2) A calculation of the maximum inventory of wastes that could be in storage and treatment at any time.		I.F.1.b #2	
			* Inventory Disposal, Removal or Decontamination of Equipment 264.114 A description of how all facility equipment and structures will be decontaminated or disposed of when closure is completed.			
✓	✓		- Decontamination procedures		I.F.1.c	
✓	✓		- Criteria for determining contamination			
✓	✓		- List equipment			
✓			- Disposal of contaminated soil	→ N/A		
✓	✓		- Decontamination of cleanup materials and residues	→		
✓			- Demonstrate decontamination has been effective.	→ more details		8-11-86
			Closure of Containers 264.178 A description of how at closure all hazardous waste residues will be removed from the containment system and how remaining containers,			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-6 bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed. The description should address the following:			
✓	✓		- Hazardous waste removal and disposal	to recycle facility		
✓	✓		- Container decontamination and disposal			
✓	✓		- Site decontamination and disposal including linings, soil, and washes			
	✓		- Verification of decontamination	→ more detail - see last section		
✓	✓		- Maximum inventory.			
			* Schedule for Closure 264.112(a)(4) A schedule for final closure including:	Not submitted		8-11-86
			- Estimated expected year of closure			
			- Closure schedule with total time to close, time for closure activities, and inspection schedule during closure.			

* This standard is substantially identical to the corresponding 40 CFR Part 265 standard.

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-6 * Time Allowed for Closure 264.113(a)&(b) A schedule for closure which shows - All hazardous wastes will be treated, removed off-site, or disposed of on-site within 90 days from receipt of final volume of waste - All closure activities will be completed within 180 days from receipt of final volume of waste.		I-F.1.d	
			* Extensions for Closure Time 264.113(a) 264.113(b) A petition made to the Department for a schedule for closure which exceeds the 90 days for treatment, removal, or disposal of wastes and/or the 180 days for completion of closure activities made to the Department. One of the following must be demonstrated: - Closure activities require longer than 180 days. - Facility has capacity to receive additional wastes		I.F.1.d (3)	

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		B-6 * - A person other than owner or operator will begin operation of the site - Closure would be incompatible with continued operation. Demonstrate that all steps have and will be taken to prevent threats to human health and environment from unclosed but inactive facility.			

* This standard is substantially identical to the corresponding 40 CFR Part 265 standard.

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			PART III - TANKS A. 40 CFR PART 265 A-1 General Operating Requirements for Tanks		PART III	
✓	✓		General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste 265.192(a) 265.17(b) A description of the precautions taken by a facility that treats, stores, or disposes of ignitable or reactive waste, or accidentally mixes incompatible waste or incompatible wastes and other materials, to prevent reactions which: (1) generate extreme heat or pressure, fire or explosions or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; (5) by similar means threaten human health or the environment.		III-A.1	

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			A-1 Tank Management Practices 265.192(b)			
✓	✓		A description of procedures of placing waste in tanks to prevent ruptures, leaks, corrosion, or other failures prior to the end of its intended life.	waste is compatible		
		✓	A description of operation procedures that ensure at least 60 cm (2 ft) of freeboard, unless the open tank is 265.192(c) equipped with a containment structure, a drainage control system, or a diversion structure with a capacity that equals or exceeds the volume of the top 60 cm (2 ft) of the tank.	needs discussion		8-11
			A description of the means to stop 265.192(d) inflow where hazardous waste is continuously fed into a tank.			
			A-2 Waste Analysis and Trial Test 265.193			
			If required in accordance with §265.193 (a)(1) or (2), the applicant should address the following: - A waste analysis and trial treatment or storage tests, OR			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		A-2 - written documented information on similar storage or treatment of similar waste under similar operating conditions.	O.K.		
			B. 40 CFR PART 264			
			B-1 Description of Tanks 122.25(b)(2) 264.191 A review of tank design specifications and engineering calculations to assure that the tanks will not collapse or rupture. The specifications and calculations to be reviewed include shell strength, capacity, pressure controls, foundations, structural support, and seams sufficient to demonstrate that tank will not collapse or rupture. Specifically, the applicant should address such items as:	15,000 gallon tank 23'3" shell thickness - 3/16" test pressure - 5 PSI MAX (AIR)	I-E.3.9	
✓	✓		- Types and number of tanks			
✓	✓		- Tank wall thickness			8-11
✓	✓		- Tank internal pressure and pressure controls			
		✓	- Foundation construction, specifications, and structural supports	more discussion		
✓	✓		- Tank design specifications including dimensions, capacity, design, shell thickness, material and method of construction			

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-1 - Tank design standard code and year? - Specifications on seams - Operating pressure and temperature - Type of waste contained in tanks - Specific gravity of tank liquids - Maximum height of liquid level			
			Tank Corrosion and Erosion 122.25(b)(2)(ii) 264.192(a) A review of the pertinent characteristics of the tank construction material and lining materials to determine corrosion or erosion effects with wastes and other materials (i.e., treatment reagents). The applicant should also address: - Description of lining and coating materials - Corrosion allowance and corrosion and errosion rates. Demonstration of how minimum shell thickness will be maintained - Tank construction compatibility with waste and tests or documentation to substantiate compatibility - Description of treatment reagents.	→ N/A	Exhibit T.E. 3-6	

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-1 122.25(b)(2)(iv) & (v) 264.192(b) Tank Management Practices A description of the tank owner's or operator's operating practices and controls:			
✓	✓		- Description of controls to prevent overfilling and overtopping such as waste feed cut-off system(s), by-pass or standby tank	Provide description	Exhibit I.E.3-7	
		✓	- Demonstration of maintenance of sufficient freeboard to prevent overtopping by wave or wind action or precipitation for uncovered tanks	N/A		
✓	✓		- Tank process flow and piping diagrams and specifications			
		✓	- Description of tank instrumentation such as pressure, temperature, pH level, gauges and monitors			
✓	✓		- Description of safety devices such as rupture discs and safety vents			
		✓	- Description of pollution control devices such as vapor recovery systems.			
			* 122.25(b)(2)(vi) 264.198 Ignitable or Reactive Wastes in Tanks A description of the operational procedures used for storing such wastes in tanks that includes specific information on:			

* This standard is substantially identical to the corresponding 40 CFR Part 265 standard.

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		B-1 * - How the waste is treated, rendered, or mixed before or immediately after placement in the tank so that it is no longer considered ignitable and complies with §264.17(b); or the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite; or the tank is used solely for emergencies. - How facilities that treat or store ignitable or reactive waste in covered tanks comply with the National Fire Protection Association's codes for tanks.	Complies with NFPA		
✓ ✓ ✓	✓ ✓ ✓		B-2 Inspection Schedule 122.25(a)(5) 264.15 * General Inspection Requirements 264.15(a)&(b) 264.33 A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment: - Monitoring equipment - Emergency and safety equipment - Security devices			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		B-2 * - Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.		I.E.4	
✓	✓		* Types of Problems 264.15(b)(3) The schedule must identify the types of problems to look for during the inspection (e.g., leaks, deterioration, readings out of specified range, missing items or materials, inoperative equipment, etc.).			
✓	✓		* Frequency of Inspection 264.15(b)(4) A description of the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. All emergency waste feed cut-off valves must be inspected at least weekly to verify proper			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-2 * operation. All system alarms must also be tested daily.			
			Specific Process Inspection 122.25(a)(5) Requirement 264.194 Tank Inspection - A description of the daily inspection of overfilling control equipment, monitoring equipment and level of waste in uncovered tanks - A description of the weekly inspection of tank construction materials and the area surrounding the tank - A schedule describing the daily monitoring of monitoring equipment (e.g., pressure and temperature gauges, shutoff valves, vents, piping, etc.) where present to ensure that the tank is operated according to design specifications - A schedule showing the level of waste in uncovered tanks is inspected daily - A schedule and procedure for assessing the condition of the tank - A procedure for emptying a tank to allow entry and inspection when necessary.	Not submitted		B-1

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-2 * Remedial Action 264.15(c) 264.194(c) Procedures for taking remedial actions when inspections reveal problems. (These may alternately be described in the contingency plan.)			
			* Inspection Log 264.73(b)(5) 264.15(d) A description of the inspection log or summary including the following: - Dates and times of inspections - Names(s) of inspector(s) - Observations made - Date and nature of repairs or remedial actions.			
			* B-3 Closure Closure Plans 122.25(a)(13) 264.112 A copy of the written closure plan consistent with the following items:			
			* Closure Performance Standard 264.111 A description of how closure			

* This standard is substantially identical to the corresponding 40 CFR Part 265 standard.

Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-3 * - Minimizes the need for post-closure maintenance - Minimizes releases of hazardous wastes, leachate, and contaminated rainfall to the air, groundwater, surface water, and surrounding land.			
			* Partial Closure and Final Closure Activities 264.112(a)(1) If partial closure is anticipated, a description of how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure. Also, a description of how and when the facility will be finally closed.			
			* Maximum Waste Inventory 264.112(a)(2) A calculation of the maximum inventory of wastes that could be in storage and treatment at any time.			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
			B-3 * Inventory Disposal, Removal or Decontamination of Equipment 264.114 A description of how all facility equipment and structures will be decontaminated or disposed of when closure is completed. - Decontamination procedures - Criteria for determining contamination - List equipment - Disposal of contaminated soil - Decontamination of cleanup materials and residues - Demonstrate decontamination has been effective.			
			* Closure of Tanks 264.197 A description of how at closure all hazardous waste residues will be removed from tanks, discharge control equipment, and discharge confinement structure, and the facility will be decontaminated. The description should address the following: - Waste removal from tanks and equipment			

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Submitted	Completed	Not Submitted	Application Reference Subject Requirement & 40 CFR Section Nos.	Comments	Location in Application	Due Date
✓	✓		B-3 * - Decontamination of all components - Verification of decontamination - Disposal of wastes and residues - Maximum inventory			
			* Schedule for Closure 264.112(a)(4) A schedule for final closure including: - Estimated expected year of closure - Closure schedule with total time to close, time for closure activities and inspection schedule during closure.			
			* Time Allowed for Closure 264.113(a)&(b) A schedule for closure which shows - All hazardous wastes will be treated, removed off-site, or disposed of on-site within 90 days from receipt of final volume of waste - All closure activities will be completed within 180 days from receipt of final volume of waste.			

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