MAY 20, 1990 UNIVERSAL WASTE & TRANSIT

review of package I sent them on Feb 12, 1990. I noted 7 items requiring further info.

Item 1 filter press - OK

Item 2a sand filter/activated carbon unit - OK

Item 2b containment trench - OK

Item 2c Activation emergency shower / fire system - OK

Item 3 Soil sampling - OK

Item 4a Closure of trailers
4b. Non-compatibles in trailers } - OK
4c. max trailer capacity

Item 5. Emergency Equipment - OK

Item 6. Operations Manager - OK

Item 7. Unknow wastes - OK

FACILITY Universal Waste
I.D. NUMBER FLD 981 932 494
PATS NUMBER HO29-17163
TYPE OF APPLICATION operating/containers
DATE Nov 6, 1989
REVIEWER L. McLaughlin

REVISION HO29-

SUBMITTALS	REF. NO	DATE	REVIEWER
Attach A-E	1	Nov 6, 1989	L. McLaughlin
	2		
	3		

REF. NO	PAGE	17-30.401(2) Part I §270.13	COMP.	INCOMP.	COMMENTS
		A. GENERAL INFORMATION			
1	1	A-1 TYPE OF FACILITY §270.13(a)	✓		storage/hot in containers; solidification
1	1	A-2 TYPE OF APPLICATION	✓		operating
1	2	A-3 DATE OPERATION BEGAN §270.13(g)	✓		has not begun, was just constructed
1	1	A-4 FACILITY NAME §270.13(b)	✓		Universal Waste & Transit, Inc
1	3	A-5 EPA/DER I.D. NUMBER	✓		FLD 981 932 494
1	2	A-6 FACILITY LOCATION §270.13(b) which address		*	2002 N Orient Road / 2501 N Orient Rd Tampa * temporary
1	2	A-7 FACILITY MAILING ADDRESS §270.13(b)	✓		same
2	2/7	A-8 FACILITY CONTACT which is it, Pam or Sharon NAME PHONE TITLE ADDRESS		*	IN APPL. 2 Sharon Roemm 813-623-5302 Facility Mgr 2002 N Orient Road ON FORM 2 Pam Davis Gen. Mgr U.P. Gen. Mgr.
1	7	A-9 OPERATOR'S NAME §270.13(d)	✓		Universal Waste
1	7	A-10 OPERATOR'S ADDRESS §270.13(d)	✓		same

PERM 30-1-88

FACILITY _____ FEDERAL I.D. NO. _____ PATS NO. _____ PAGE 2 of 3

REF. NO	PAGE	17-30.401(2) Part I	COMP.	INCOMP.	COMMENTS
1	2	A-11 FACILITY OWNER'S NAME §270.13(e)	✓		M.C. Carolan, President Michigan
1		A-12 FACILITY OWNER'S ADDRESS §270.13(e)		*	unknown (related)
1	3	A-13 LEGAL STRUCTURE A-14 COUNTY-STATE REGISTRATION	✓ ✓		company / corp Delaware
1	3	A-15 STATE OF INCORPORATION	✓		Delaware and Florida
1		A-16 PARTNERSHIP OWNERS NAMES ADDRESS	✓		N/A
1		A-17 SITE OWNERSHIP STATUS LAND OWNER'S LAND OWNER'S ADDRESS	✓	*	M.C. Carolan
1	3	A-18 ENGINEER NAME REGISTRATION NUMBER ADDRESS ASSOCIATION	✓	*	James Winters Seminole Engineering, Inc 14483 62nd St N → does this business have a name? Clearwater, FL Seminole Engineering #18313 who is Paul Bellbarn? same person must sign & seal
1	3	A-19 INDIAN LAND §270.13(f)	✓		NO
1		A-20 EXISTING ENVIRONMENTAL PERMITS §270.13(k)	✓		will accept const. permit
1	4	B. SITE INFORMATION B-1 FACILITY LOCATION COUNTY §270.13(b) NEAREST COMMUNITY LATITUDE LONGITUDE	✓		Orient Road Hillsb. Tampa 27° 57' 49" N 83° 22' 23" W

FACILITY _____ FEDERAL I.D. NO. _____ PATS NO. _____ PAGE 3 OF 3

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1	5	B-2 AREA OF FACILITY SITE	✓		1.4 ACRES
1		B-3 SCALE DRAWING AND PHOTOGRAPHS §270.13(h)		*	no photos
1		B-4 TOPOGRAPHIC MAP §270.13(1) MAP SCALE AND DATE 100- YEAR FLOODPLAIN AREA ORIENTATION OF THE MAP SURFACE WATER BODIES WITHIN 1/4 MILE OF THE FACILITY PROPERTY BOUNDARY SURROUNDING LAND USES LEGAL BOUNDARIES OF THE FACILITY INJECTION WELLS DRINKING WATER WELLS INTAKE AND DISCHARGE STRUCTURES			refer to Part II-A-1
1	7	B-5 FLOOD PLAIN	✓		NO
1	5	C. LAND USE INFORMATION C-1 ZONING	✓		heavy industrial
1		C-2 ZONING CHANGES			n/a
1	6	C-3 PRESENT LAND	✓		heavy industry on all adj lots
1		D OPERATING INFORMATION D-1 WASTE GENERATED ON SITE §270.13(c)	✓		yes ✓
1	11	D-2 DESCRIPTION OF OPERATION §§270.13(i) and (m)	✓		
1		D-3 PROCESS CODE §270.13(j) DESIGN CAPACITY AND UNITS EPA HAZARDOUS WASTE NUMBER ANNUAL QUANTITY AND UNITS which ones?	✓		SIC Codes: 9511, 8911, 4953 and 7391 pg 9 of appl. 9511 and 8734 on pg 10 of Notebook

It is not the intent of the government of this State to authorize the construction of a hazardous waste facility in Polk county at the expense of the citizens and the environment in order to facilitate federal requirements.

Universal Waste
HC permit modification

Spec. Cond. 1 must be changed - cannot operate w/o an HO.

* aside { Spec. Cond 3 has not been complied w
11 " " " "
12 " " " "
13 " " " "

Spec. Cond. 6 must be met - establish financial assur. for closure
8 must be [illegible] - get EPA ID # & HW transporter license

(OK) * Attach 15 vol 5 contamination of soils present, a copy is requested in which all analyses can be seen

Quest on blue prints:
Floor plan: which walls are the 4 hour resist. ones? And what is 1,2 and 3
Plumbing riser - check hot water heater
These drawings are preliminary not as built - [illegible] refers to facility as proposed / need C of C, FC
Cannot understand how type C outfall structure will work

1.5 hr 21 late

and bot o/w separator even contacts sw

compare attach 10 w/ materials listed on 1st page of blue print which is most correct? Use attach 10

Provide a cross section of the sumps

consist.

→ Can we be authorized in this HO to store unknowns during an emergency situations if we request it IN writing & do a narrative

10/20 2:20
10/21 8:50

Bob
623-5302

find out from Bill
request mod to application submitted
- request in writing mod to HO APPL file No H029-17163 to receive & store UNKNOWNS
- explain why this is necessary
- provide narrative describing policy from start to finish ie what finger printing done, manifesting, labeling where stored (show on drwgs)?

check to see if closure of [illegible] is covered

FACILITY Universal Waste
I.D. NUMBER FLD 981 932 494
PATS NUMBER H029-171163
TYPE OF APPLICATION Operating/Containers
DATE Nov
REVIEWER L. Milanian

SUBMITTALS	REF. NO	DATE	REVIEWER
Attach A-F	1	Nov	L. Milanian
Loose leaf pages	2 noted as OK'd	Dec 7, 1989	LRM
	3		

REF. NO	PAGE	17-30.401(2) Part II (B) - CONTAINERS §270.15	COMP.	INCOMP.	COMMENTS
1 Vol 1	76-86	1 (a) Containers Without Free Liquids Test for Free Liquids §264.175(c) 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. Container Storage Area Drainage §264.175(c) The storage area must be sloped or otherwise designed to drain and remove liquid resulting from precipitation — N/A, under roof - Design drawing showing location of hazardous waste storage area → check Attach. F - Description of stacking practices → unknown - Base slope- 1/8" per foot to sump - Drainage design and removal system including calculations - containers protection from liquid		(OK) * ok (*)	C of C of A seems to be missing (ask this on blue print sheet) put in vol 1 tab 1 N/A, design is for free liq. is installed will drums be on pallets? NO is not installed yet right?
1 Vol 1		1 (b) Containers With Free Liquids §264.175(b) Secondary Containment System Design and Operation		* provide inspection check-off sheet	where exactly will the filter press be located and what type of 2ndary containment will be provided? How often will filter (material) require changing, how will it be disposed(?) Exactly which IPA wastes will the press treat? where will the resulting solid be stored (2000 lbs/day) & filtrate? DOFS (on back)

PERM 30-3-88

will only treat same wastes authorized to store except flammables & corrosives ← make a table ←

OK con't → {the 33,600 gal capacity given for max drum storage include the filtrate? what % is filtrate. what % is the pressed solid?

FACILITY _____ FEDERAL I.D. NO. _____ PATS NO. _____ PAGE 2 OF 11

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1	76- 86	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 1/8" per ft - Description of curbs, dikes, berms, ditches, and trenches		OK OK	Sump = 3' x 4.5' x 8 = 108 ft³ x 7.5 gal/ft³ ≈ 810 gal Pg 77 sump vol is 4050 gal max storage is 33,600 gal (# of 55 drums) supporting calculations missing diagram detailing what is going in each of 3 areas and spacing & stacking of drums (& # of drums is necessary (52 some notes on aisle space) 5 sumps
1 Vol 1	76	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 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	✓	OK (*)	Pg 76 - You say 3 containment bays in the general storage area and 1 in the flammable, however there are 5 noted! 1 coat of sealant (+) 2 coats of epoxy urethane
1 Vol 1	76	- Containment System Drainage §264.175(b)(2) The base must be sloped or the containment system must be otherwise	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1	78	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 practice - Grading of base - Drainage design and removal system so that standing liquid does not remain on base after a leakage or precipitation event.		ok(*) *	statment that says only non-contact storm water to pond. how will the sand filter & activ. carbon filtration sys be inte the ww trt sys & why are these 2 devices necessary. How will spent filters be checked &/or backwashed? (pg 77) if fire sprinkler sys is activated and large quantities of ww are generated ie 74050 gal what will happen and is this possible. Rotary or air powered diaphragm pumps
1 Vol 1	77	- Containment System Capacity §264.175(b)(3) The containment system must have sufficient capacity 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 supporting containment not given
1 Vol 1	77	- Control of Run-on §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 applicant should discuss structure used to control run-on such as:	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		- 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		
i VOL I	78	- <u>Removal of Liquids from Containment System</u> §264.175(b)(5) 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 (sump pump design, piping specifications, location, discharge point and capacity) - Management of accumulated liquid including prevention of overflow.	✓ 1	*	(pg 42) and (pg 78) loading area, has containment trench, what is the trench's dimensions and capacity? How long can a spilled waste remain in the trench, while a "quick" analysis is being conducted? where will overflow proceed.
1 VOL 1	79	2 - <u>Ignitable or Reactive Wastes in Containers</u> §264.176 Sketches, drawing, or data demonstrating that containers of ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line.		(OK)	* which area will be the designated ignitable, reactive or incomp. waste area
1 VOL 1	78	<u>Incompatible Wastes in Containers</u> §264.177	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1	80- 81	- The procedures used to ensure that incompatible wastes and material 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.	✓		
1 Vol 1	79- 81	3 General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste 264.177(a)&(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.	✓		
1 Vol 1	82- 84	4 Description of Containers §§264.171 & 264.172 A description of the facility's primary containment devices that includes basic design parameters, dimension, material of construction, and compatibility of waste with containers. Information submitted should include:			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1	82-84	- 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.		(Skip) X	please state what DOT Type of drums will be on-site for "Emergency" purposes
1 Vol 1	82	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 - 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.			Some of these items are noted else where & required clarification
1 Vol 1	85	5 Inspection Schedule §§264.15 & 264.174 General Inspection Requirements A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment: - Monitoring equipment - Emergency and safety equipment	✓		Attach. 14

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		- Security devices - Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.		(OK) ✓	did not identify inspection of the loading dock trench on the inspec. sheet of Attach. 14 (was to be on pg 6)
1 Vol 1	55	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.).	✓		Attach 14
		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 undected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected at least weekly to verify proper operation. All system alarms must also be tested daily.	✓		
1 Vol 1	55	Specific Process Inspection Requirements Container Inspection §264.174 A description of the weekly inspection of containers and container storage areas for	✓		Attach. 14

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1	85	leaks in containers or deterioration of the containment system.	✓		Check it
		Remedial Action §264.15(c) Procedures for taking remedial actions when inspections reveal problems. (These may alternately be described in the contingency plan.)	✓		
		Inspection Log §264.15(d) A description of the inspection log or summary including the following: - Dates and times of inspection - Name(s) of inspector(s) - Observations made - Date and nature of repairs or remedial actions.	✓	(OK) *	pg 88 filtrate possibly sent to city sewers? 1. you are to be on a septic system, so how can a reinstatement to city sewer be possible 2. do you have an approval letter from the city sewer?
1 Vol 1	2-4 1-35	6 Closure §§264.178 & 264.112 * Closure Plans A copy of the written closure plan consistent with the following items: Closure Performance Standard §264.111 A description of how closure - Minimizes the need for post-closure maintenance - Minimizes releases of hazardous wastes, leachate, and contaminated rainfall to the		(OK) *	pg 90 where will filtrate be disposed?

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		air, groundwater, surface water, and surrounding land.			
		Partial Closure and Final Closure Activities §264.112 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.			N/A
1 vol tab 24	3-4	6 Maximum Waste Inventory §264.112(b)(3) A calculation of the maximum inventory of wastes that could be in storage and treatment at any time.	✓	(SKIP) ✗	what will be done of the filter press And how will the additional storage trailers be closed?
		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.		(SKIP) ✗	provide a list of all decontamination & clean-up equip. to be used to assist closure activities by 19 3rd party

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1 Tab 24	18	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, 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 - Container decontamination and disposal - Site decontamination and disposal including linings, soil, and washes - Verification of decontamination - Maximum inventory .		(OK)*	Since you plan to consolidate wastes (1,9) by placing them on trailers, what will become of the empty drums? * pg 18 please provide map detailing the location of 4 soil samples and the depth to be sampled to in a narrative, also show on diagram location of 3 wells, provide NARRATIVE on samples to be analyzed for from the soils & the GW EXPLAIN how locations selected and parameters noted will be representive.
1 Vol 1 Tab 24	11 and 20	Schedule for Closure §264.112(b)(6) 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.	✓	*	
	12 - 16	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	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		of waste - All closure activities will be completed within 180 days from receipt of final volume of waste.			
		Extensions for Closure Time §§264.113(a) and 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 - 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.			N/A

start discussion on pg 6

revealing HC39-141782

FACILITY Universal Waste
I.D. NUMBER FLD 981 932 494
PATS NUMBER HO29-171163
TYPE OF APPLICATION Operating/Post Closure
DATE Nov 7, 1989
REVIEWER L. M. Lamson

SUBMITTALS	REF. NO	DATE	REVIEWER
Attach A-F	1	Nov 7, 1989	L. M. Lamson
Loose Leaf pages 1	2 noted as OK's	Dec 7, 1989	LRM
	3		

REF. NO	PAGE	17-30.401(2) Part II - A - GENERAL §270.14	COMP.	INCOMP.	COMMENTS
1 Vol 5	6 25	1 A. TOPAGRAPHIC MAP 1" TO 200' §270.14(b)(19) MAP SCALE AND DATE 100 - YEAR FLOODPLAIN AREA ORIENTATION OF THE MAP ACCESS CONTROL — missing INJECTION AND WITHDRAWAL WELLS BUILDING AND OTHER STRUCTURES — missing CONTOURS LOADING AND UNLOADING AREAS — missing DRAINAGE OR FLOOD CONTROL — missing RUNOFF CONTROL SYSTEM — missing LOCATION OF TSD AREAS PAST, PRESENT, FUTURE — n/a LOCATION OF SOLID WASTE MANAGEMENT UNITS		(skip) *	topo map in Vol 5 attach 4 scale is 1:24000 Not 1:200 wells in Vol 5 attach. 5 (ok) * provide cross section of sumps — see if these items are located elsewhere } in as builts maybe
1 Vol 5	6	B. WIND POSE WIND SPEED DIRECTION LEGEND DATE	✓		Vol 5 Attach 8
1 Vol 1	23	C. TRAFFIC PATTERNS §270.14(b)(10) VOLUME PATTERN CONTROL ACCESS ROADS LOAD - BEARING CAPACITY ROAD SURFACES	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1	26	2 FINANCIAL RESPONSIBILITY INFORMATION CALL TALLAHASSEE TO GET INFORMATION ON COMPLETENESS OF FINANCIAL.			is provided (unknown if is complete)
1 Vol 1 and 5	29	3 FLOOD MAP §270.14(b)(11) DOCUMENTATION OF WHETHER OR NOT THE FACILITY IS LOCATED WITH 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 ° OTHER SPECIAL FLOODING FACTORS (E.G., WAVE ACTION) THAT MUST BE CONSIDERED TO PREVENT WASHOUT. <u>DEMONSTRATION OF COMPLIANCE</u> FOR FACILITIES LOCATED WITHIN THE 100-YR FLOOD-PLAIN, A DESCRIPTION OF HOW 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: <u>FLOOD PROOFING AND FLOOD PROTECTION</u> A STRUCTURAL OR OTHER ENGINEERING STUDY SHOWING HOW DESIGN OF HAZARDOUS WASTE UNITS AND THE FLOOD PROOFING AND PROTECTION DEVICES AT THE FACILITY WILL PREVENT WASHOUT INCLUDING:	✓		map is in Vol 5 attach 9 else attach 6 certified not in flood plane

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		° ENGINEERING ANALYSIS OF HYDRODYNAMIC AND HYDROSTATIC FORCES ° STRUCTURAL OR OTHER ENGINEERING STUDIES OF HAZARDOUS WASTE UNITS AND FLOOD PROTECTION DEVICES. FLOOD PLAIN DESCRIPTION OF THE PROCEDURES TO BE FOLLOWED TO REMOVE HAZARDOUS WASTE TO SAFETY BEFORE THE FACILITY IS FLOODED. THE PLAN MUST ADDRESS THE FOLLOWING: ° TIMING RELATED TO FLOOD LEVELS ° ESTIMATED TIME TO MOVE THE WASTE ° DESCRIPTION OF THE LOCATION TO WHICH THE WASTE WILL BE MOVED MOVED AND PROOF OF THE RECEIVING FACILITY'S ELIGIBILITY TO RECEIVE HAZARDOUS WASTE ° PROCEDURES, EQUIPMENT, AND PERSONNEL TO BE USED AND THE MEANS TO ENSURE THAT THESE RESOURCES WILL BE AVAILABLE ° POTENTIAL FOR ACCIDENTAL DISCHARGE OF THE WASTE.			N/A
1 VOL I	30	4 FACILITY SECURITY INFORMATION a) DESCRIPTION OF SECURITY §§264.14 and 270.14(b)(4) SECURITY PROCEDURES AND EQUIPMENT UNLESS A WAIVER IS GRANTED, THE FACILITY MUST DEMONSTRATE THE FOLLOWING: 24-HOUR SURVEILLANCE SYSTEM §264.14(b)(1) A 24-HOUR SURVEILLANCE SYSTEM THAT CONTINUOUSLY MONITORS AND CONTROLS ENTRY ONTO THE ACTIVE PORTION OF THE FACILITY (e.g., TELEVISION MONITORING OR SURVEILLANCE BY	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		GUARDS OR FACILITY PERSONNEL); OR BARRIER AND MEANS TO CONTROL ENTRY BARRIER §264.14(b)(2)(i) AN ARTIFICIAL OR NATURAL BARRIER THAT COMPLETELY SURROUNDS THE ACTIVE PORTION OF THE FACILITY; HEIGHT OF FENCE MATERIAL OF CONSTRUCTION AND 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.)	✓		7' HIGH FENCE around active portion of site working hours are from 7a.m. to 6P.M.
1 Vol 1	30	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 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	✓		SIGN IS IN ENGLISH & SPANISH

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 vol 1	30	PORTION AND THAT ENTRY ONTO THE WAIVER ACTIVE PORTION CAN BE DANGEROUS.			
1 Vol 1	30	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 UNKNOWNING 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 UNAUTHKORIZED ENTRY OF PERSONS OR LIVESTOCK ONTO THE ACTIVE PORTION OF A FACILITY WILL NOT CAUSE A VIOLATION OF THE REQUIRMENTS OF §264.			N/A N/A, WAIVER is not requested
1 Vol 1	31	b) CONTINGENCY PLAN §§264 SUBPART D AND 270.14(b)(7) A COPY OF THE CONTINGENCY PLAN OR SPILL PREVENTION CONTROL AND COUNTER MEASURES (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	✓		and vol 2 entire document

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		CONSTITUENTS TO AIR, SOIL, SURFACE WATER, OR GROUND WATER AT THE FACILITY.	✓		
1 vol 2	1-3	GENERAL INFORMATION §§264.52 AND .53 FACILITY NAME AND LOCATION OWNER OR OPERATOR NAME → missing SITE PLAN DESCRIPTION OF FACILITY OPERATIONS → missing			Vol. 2 pg 1-3
1 Vol 2	6 (8-11)	EMERGENCY COORDINATORS §§264.52(d) AND .55 NAMES, ADDRESSES, OFFICE AND HOME PHONE NUMBERS, AND DUTIES OF PRIMARY AND ALTERNATE COORDINATES Start ↗ A STATEMENT AUTHORIZING DESIGNATED → signed statement not COORDINATORS TO COMMIT THE NECESARY RESOURCES TO IMPLEMENT THE CONTINGENCY PLAN	✓		provided (OK)
1 Vol 2	10-11	IMPLEMENTATION §§264.52(a) & 264.56(d) CRITERIA FOR IMPLEMENTATION OF CONTINGENCY PLAN FOR ANY POTENTIAL EMERGENCY.	✓		
1 Vol 2		EMERGENCY RESPONSE PROCEDURES §§264.56(a)&(d) NOTIFICATION METHODOLOGY FOR IMMEDIATE NOTIFICATION OF FACILITY → Pg 16 & 17 PERSONNEL AND NECESSARY STATE OR LOCAL AGENCIES.	✓		→ Pg 7-9
		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	✓		→ pg 15 procedures identification, available data Appd II, tabs N, O, P, Q and pg 27

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 2		CHEMICAL PROPERTIES OF THE WASTE EXACT SOURCE AMOUNT AREAL EXTENT OF RELEASE	✓		cont thru pg 15-25
1 Vol 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.	✓		pg 15-25
1 Vol 2		CONTROL PROCEDURES §264.52(a) 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.	✓	(OK) *	all detailed except for a releasement outside the building
1 Vol 2		PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES § 264.56(e) 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 WASTE AT THE FACILITY. STEPS SHOULD INCLUDE: SHUT-DOWN OF PROCESSES AND	✓		pg 15-16 and 22-23

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 2		CONTINUED MONITORING OF THEM COLLECTING, CONTAINING AND TREATING RELEASED WASTED 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)	✓		pg 19-21 pg 37-39 pg 22-23
1 Vol 2		STORAGE AND TREATMENT OF RELEASED MATERIAL §264.56(g) PROVISION 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	✓	*	pg 21 pg 30-32 (location of equip. unknown) - OK and waste areas not labeled - pg 18) - OK pg 24 Also, where is the storage trailer to be located? - OK some emergency equip will be stored in the trailer! pg 35 - check w/ Beth pg 25 and Appd 3 * { expand NARRATIVE how much there, will it affect the closure provide proof of transporter status - OK
1 Vol 2		INCOMPATIBLE WASTE §264.56(h)(1) PROVISIONS FOR PREVENTION OF INCOMPATIBLE WASTE FROM BEING TREATED, STORED, OR LOCATED THE AFFECTED AREAS UNTIL CLEANUP PROCEDURES ARE COMPLETED.	✓	*	pg 19 (more on pg 13 of checksheet on trailers) on pg 39 waste movement, what precautions will be observed to ensure that non-compatible HW are not stored together on the trailers? And exactly how much storage space (ie extra) will be available due to trailer usage?

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 2		POST-EMERGENCY EQUIPMENT MAINTENANCE §§264.56(h)(2) and (i) PROCEDURES FOR ENSURING THAT ALL EMERGENCY EQUIPMENT LISTED IN THE CONTINGENCY PLAN IS CLEANED AND FIT FOR ITS INTENDED USE BEFORE OPERATIONS ARE RESUMED.	✓	*	pg 25 did not say would test equip. to ensure its effectiveness.
		SURFACE IMPOUNDMENTS SPILLS AND LEAKAGE N/A			
1 Vol 2		EMERGENCY EQUIPMENT §264.52(e) LOCATION, DESCRIPTION, AND CAPABILITIES OF EMERGENCY EQUIPMENT. THIS SHOULD INCLUDE: SPILL CONTROL EQUIPMENT FIRE CONTROL EQUIPMENT PERSONNEL PROTECTIVE ITEMS SUCH AS RESPIRATORS AND PROTECTIVE CLOTHING FIRST AID AND MEDICAL SUPPLIES EMERGENCY DECONTAMINATION EQUIPMENT EMERGENCY COMMUNICATION AND ALARM SYSTEMS	✓	(OK)	pg 30-33 *Appendix 3 (Section J) mentions 5 materials to assist in decontamination activities which do not appear on your list of emergency equip. on pg 30. (again, location of equip. unknown) pg 33
1 Vol 2		COORDINATION AGREEMENTS §§264.37 & .52(c) 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. A STATEMENT INDICATING THAT A COPY OF THE CONTINGENCY PLAN HAS BEEN	✓		Section R

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		SUBMITTED TO THESE ORGANIZATIONS IF APPLICABLE, DOCUMENTATION OF REFUSAL TO ENTER INTO A COORDINATION AGREEMENT	✓		
1 Vol 2		EVACUATION PLAN §264.52(f) THIS PLAN MUST INCLUDE: CRITERIA FOR EVACUTION A DESCRIPTION OF SIGNAL (S) TO BE USED TO BEGIN EVACUATION WITH PRIMARY AND ALTERNATE EVACUATION ROUTES, RALLY POINTS	✓		pg 15 Notification to evacuate pg 16 item 10 route is in part K
1 Vol 2		REQUIRED REPORTS §264.56(u) PROVISIONS FOR SUBMISSION OF REPORTS OF EMERGENCY INCIDENTS WITHIN 15 DAYS OF OCCURANCE NOTATION OF SUCH INCIDENTS IN THE OPERATING RECORD IDENTIFYING THE TIME, DATE, AND DETAILS OF THESE EMERGENCY INCIDENTS	✓		pg 9
1 Vol 1	32	C) DESCRIPTION OF PROCEDURES, STRUCTURES, OR EQUIPMENT §270.14(b)(8) A DESCRIPTION OF PROCEDURES, STRUCTURES OR EQUIPMENT USED AT THE FACILITY FOR THE FOLLOWING: PREVENTION OF HAZARDS IN UNLOADING OPERATIONS (e.g. USE OF RAMPS OR SPECIAL FORKLIFTS) 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) PREVENTION OF CONTAMINATION OF	✓ ✓ ✓	*	pg 42 Any contaminated liq in trench must be disposed of-site. If you run it thru the sand filter & the act carbon unit & then release to pond - you are disposing HW via land. (Statement must be removed) OK The trench should be operated with a 2 way valve that will be always open except during waste transfer at the loading dock; this way stormwater will not collect in the limited capacity of the trench. Provide narrative of decontamination to the trench should a spill occur. 34-36 41-42 41-42 39-40 * how will collected stormwaters be examined to determine if contamination is present and where will collected waters be disposed (ie from the truck wells)

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1		WATER SUPPLIES MITIGATION OF EFFECTS OF EQUIPMENT FAILURE AND POWER OUTAGES PREVENTION OF UNDUE EXPOSURE OF PERSONNEL TO HAZARDOUS WASTE (e.g., PROTECTIVE CLOTHING)	✓ ✓		PG 32 PG 37-38
1 Vol 1	43- 46	PRECAUTIONS TO PREVENT OR IGNITION OR REACTION OF IGNITABLE FOR REACTIVE WASTE §264.17(a) A DESCRIPTION OF THE PRECAUTIONS TAKEN BY A FACILITY THAT HANDLES IGNITABLE, REACTIVE WASTE TO PREVENT ACTUAL IGNITION, INCLUDING SEPARATION FROM SOURCES OF IGNITION SUCH AS OPEN FLAMES SMOKING, 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 LOCATIONS. "NO SMOKING" SIGNS MUST BE CONSPICUOUSLY PLACED WHEREVER A HAZARD EXISTS FROM IGNITABLE OR REACTIVE WASTE.		ok (*)	Indicate where fluids used to flush pumps, hoses & piping will report once utilized. (PG 45)
1 Vol 1	43- 46	GENERAL PRECAUTIONS FOR HANDLING IGNITABLE OR REACTIVE WASTE AND MIXING OF INCOMPATIBLE WASTE §264.17(b) A DESCRIPTION OF THE PRECAUTIONS TAKEN BY A FACILITY THAT TREATS, STORES, OR DISPOSES OF IGNITABLE OR REACTIVE WASTE AND OTHER MATERIALS,	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1	45-46	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.	✓		
1 Vol 1	47-54	D) PREPAREDNESS AND PREVENTION PROCEDURES EQUIPMENT REQUIREMENTS §§264.32 & 270.14(b)(6) DEMONSTRATE THAT NONE OF THE HAZARDS POSED BY WASTE HANDLED AT THE FACILITY COULD REQUIRE A PARTICULAR KIND OF EQUIPMENT SPECIFIED BELOW. OR THE FACILITY MUST HAVE THE FOLLOWING EQUIPMENT:	✓		pg 47 and attach. 17 in vol 5
1 Vol 1		INTERNAL COMMUNICATIONS §264.32(a) AN INTERNAL COMMUNICATION OR ALARM SYSTEM CAPABLE OF PROVIDING IMMEDIATE EMERGENCY INSTRUCTION TO FACILITY PERSONNEL.	✓		pg 48 ✓
1 Vol 1		EXTERNAL COMMUNICATIONS §264.32(b)	✓		pg 48 ✓

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1	48	A DEVICE SUCH AS A TELEPHONE OR A HANDHELD TWO-WAY RADIO, FOR SUMMONING EMERGENCY ASSISTANCE FROM LOCAL POLICE DEPARTMENT OR STATE OR LOCAL EMERGENCY RESPONSE TEAMS.	✓		
1 Vol 1	49	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	✓		also refers to 115 in Vol 2 Contingency Plan
1 Vol 1	49	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	✓		6" water lines. Plans many extras
1 Vol 1	52-53	AISLE SPACE REQUIREMENT §264.35 ADEQUATE AISLE SPACE AVAILABLE 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.	✓	*	what type of policy will be followed for storage of wastes in trailers (ignitable/compatibles) & which wastes maybe stored in the trailers & for how long ~ please prepare a narrative on this possible storage activity.
1 Vol 1 and 4	55-59	E) PERSONNEL TRAINING §§264.16 & 270.14(b)(12) AN OUTLINE OF BOTH THE INTRODUCTORY AND CONTINUING TRAINING PROGRAMS BY OWNERS	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1&4		AND OPERATORS TO PREPARE THE PERSONNEL TO OPERATE AND MAINTAIN THE FACILITY IN A SAFE MANNER. INCLUDE A BRIEF DECRIPTION OF HOW TRAINING WILL BE DESIGNED TO MEET ACTUAL JOB TASKS. (NOTE: ON-THE-JOB TRAINING MAY BE USED TO COMPLY WITH THESE REQUIREMENTS.)	✓		pg 3 vol 4
1 Vol- 1&4		JOB TITLES AND DUTIES §§264.16(d)(1) & (2) FOR EACH EMPLOYEE WHOSE POSITION AT THE FACILITY IS RELATED TO HAZARDOUS WASTE MANAGEMENT INCLUDE: NAME JOB TITLE JOB DUTIES JOB DESCRIPTION		*	names, title & description - but no specific duties!
1 Vol 1&4	59	TRAINING CONTENT, FREQUENCY, AND TECHNIQUES §§264.16(d)(3) & (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	✓		provided duty description for all but "Operations Manager" perhaps will be identical to "Facility manager"
1 vol 1&4	56	TRAINING DIRECTOR §264.16(a)(2) DEMONSTRATION THAT THE PROGRAM IS DIRECTED BY A PERSON TRAINED IN HAZARDOUS WASTE MANAGEMENT. CREDENTIALS OF TRAINING DIRECTOR		*	is it feasible that your trainer live in Michigan?
1 Vol 1&4	56-59	RELEVANCE OF TRAINING TO JOB POSITION §264.16(a)(2) A BRIEF DESCRIPTION OF HOW INSTRUCTION OF FACILITY PERSONNEL IN HAZARDOUS WASTE MANAGEMENT PROCEDURES (INCLUDING	✓		

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 4	Chp 5 1-14	CONTINGENCY PLAN IMPLETATION) IS RELEVANT TO THEIR POSITIONS.	✓		
1 Vol 4	Chp 5	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, AND EMERGENCY EQUIPMENT, AND EMERGENCY SYSTEMS, INCLUDE WHERE APPLICABLE:			Chp 3 and 4 (vol 4) clothing & respiratory equip.
		PROCEDURES FOR USING, INSPECTING, REPAIRING, AND REPLACING FACILITY EMERGENCY AND MONITORING EQUIPMENT	→	X	missing from training manual / portion facility manager resp. for this vol 5 tab 14 pg 1
		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 - 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, will be small batch operations
				X	where will wwl report that have collected in the emergency shower station
1 vol 4	7	COMMUMICATIONS OR ALARM SYSTEM	✓		
1 vol 4	9	RESPONSE TO FIRES	✓		
2 Vol 3	tab C	RESPONSE TO GROUNDWATER CONTAMINATION INCIDENTS pg 21		(OK) X	concerning an outside release, no mention

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		SHUTDOWN OF OPERATIONS			N/A, batch type process
1 Vol 4	1-6	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 AT FACILTIY, 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	✓		
1 Vol 1	60-61	5 CHEMICAL AND PHYSICAL ANALYSIS §§264.13(a)& 270.14(b)(3) FOR EACH HAZARDOUS WASTE TREATED, STORED OR DISPOSED AT THE FACILITY, THE FOLLOWING INFORMATION SHOULD BE PROVIDED: - GENERAL SOURCE AND DESCRIPTION OF THE WASTE - HAZARDOUS CHARACTERISTICS - BASIS FOR HAZARD DESIGNATION - LABORATORY DATA ON ANALYSES RESULTS - 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.	✓		See Vol 3

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 1 Vol 3	62-64 1	6 WASTE ANALYSIS PLAN §§270.14(b)(2) & 264.13 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.	✓		
1 Vol 3	6-7	- PARAMETERS AND RATIONALE §264.13 A LIST OF PARAMETERS CHOSEN FOR ANALYSIS AND AN EXPLANATION OF THE RATIONALE FOR THEIR SELECTION.	✓		
1 Vol 3	7	- TEST METHODS §264.13 A DESCRIPTION OF THE TEST METHODS USED TO TEST FOR PARAMETERS CHOSEN (EPA OR EQUIVALENT METHOD).	✓		and also in QA/QC Plans
1 Vol 3	7	- SAMPLING METHODS §264.13 & 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).	✓		table 4 (also table 1-3 for reference)
1 Vol 3	2	- 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.	✓		
1 vol 3	3	- ADDITIONAL REQUIREMENTS FOR WASTES GENERATED OFF-SITE §§264.13(b)(5) & 264.13(c) A DESCRIPTION OF THE PROCEDURES USE TO	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
1 Vol 3	3	INSPECT AND/OR ANALYZE WASTES GENERATED OFFSITE THAT INCLUDES PROCEDURES TO DETERMINE THEIR IDENTITY AND SAMPLING METHODS USED. ALSO INFORMATION SUPPLIED BY THE GENERATOR.	✓		
1 Vol 3	5	- ADDITIONAL REQUIREMENTS FOR FACILITIES HANDLING IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES §§264.13(b)(6) & 264.17 IF THE FACILITY STORES OR TREATS IGNITIBLE, OR INCOMPATIBLE WASTE, A DESCRIPTION OF METHODS WHICH WILL BE USED TO MEET THE ADDITIONAL WASTE ANALYSIS REQUIREMENTS NECESSARY FOR COMPLYING WITH THE REGULATORY REQUIREMENTS FOR THESE TYPES OF HAZARDOUS WASTE.	✓		
1 Vol 1	65-68 69-75	7 MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING §264.12; 264.71; §264.72; 264.73; - REQUIRED NOTICES §264.74; 264.75; - MANIFEST SYSTEM §264.76; 264.77; - OPERATING RECORDS - RECORDS RETENTION - ANNUAL REPORTS - UNMANIFESTED WASTE REPORTS - WASTE MINIMIZATION - ADDITIONAL REPORTS	✓		