

Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

January 12, 2001

Mr. Mohamed Rizk
Van Waters & Rogers, Inc.
6100 Carillon Point
Kirkland, Washington 98033

Re: Final Agency Action (Short Form Consent Order)
Van Waters & Roger, Inc.
OGC File # 00-2287

Dear Mr. Rizk:

Enclosed is a copy of the executed Short Form Consent Order for the referenced case. The Department has received your check for \$8,000.00 as stipulated by the Order. This enforcement action is now closed.

If you have any questions please call me at (813) 744-6100, extension 493.

Sincerely,


Raymond L. Wingo
Environmental Specialist I
Division of Waste Management

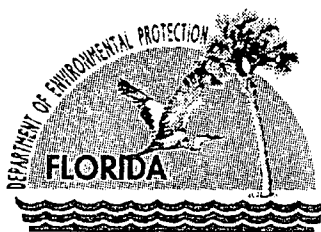
RLW/rlw

Enclosure

cc: Kathy Carter, OGC
Larry Morgan, OGC
Steve Ray, HWR Section
Jeff Pallas, US EPA Region IV
Compliance File

"More Protection, Less Process"

Printed on recycled paper.



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

December 19, 2000

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Mohamed Rizk
Van Waters & Rogers, Inc.
6100 Carillon Point
Kirkland, Washington 98033

SUBJECT: Proposed Settlement of Van Waters & Rogers, Inc
OGC File No.: 00-2287

Dear Mr. Rizk:

The purpose of this letter is to complete the resolution of the matter previously identified by the Department in the Warning Letter dated September 17, 2000, a copy of which is attached. The corrective actions required to bring your facility into compliance have been performed. In order to resolve the matters identified in the attached Warning Letter, you are assessed civil penalties in the amount of \$7900.00, along with \$100.00 to reimburse the Department costs, for a total of \$8,000.00. This payment must be made payable to the Department of Environmental Protection by cashier's check or money order and shall include the OGC File Number assigned above and the notation "Ecosystems Management and Restoration Trust Fund." Payment shall be sent to the Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida 33619 within 10 days of your signing this letter.

Your signing this letter constitutes your acceptance of the Department's offer to resolve this matter on these terms. If you elect to sign this letter, please return it to the Department at the address indicated above. The Department will then countersign the letter and file it with the Clerk of the Department. When the signed letter is filed with the Clerk, the letter shall constitute final agency action of the Department which shall be enforceable pursuant to Section 120.69 and 403.121, Florida Statutes.

RECEIVED

DEC 28 2000

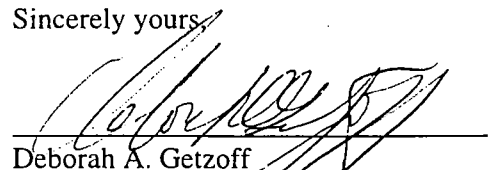
REGULATORY AFFAIRS

"More Protection, Less Process"

Printed on recycled paper.

If you do not sign and return this letter to the Department at the District address by December 27, 2000, the Department will assume that you are not interested in settling this matter on the above described terms, and will proceed accordingly. None of your rights or substantial interests are determined by this letter unless you sign it and it is filed with the Department Clerk.

Sincerely yours,


Deborah A. Getzoff
Director of District Management
Southwest District

I, _____ on behalf of, _____

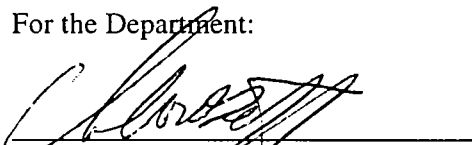
HEREBY ACCEPT THE TERMS OF THE SETTLEMENT OFFER IDENTIFIED ABOVE.

For Van Waters & Rogers, Inc.:

By: _____

Mohamed Rizk
Manager, Regulatory Affairs
Van Waters & Rogers, Inc.

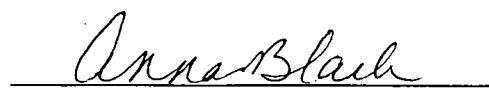
For the Department:


Deborah A. Getzoff
Director of District Management
State of Florida Department of
Environmental Protection

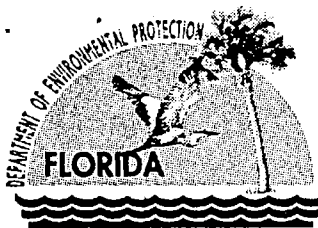
Entered into this 8th day of January, 2000 in Tampa, Florida.

DAG/rlw

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

1-12-01
Date



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

September 11, 2000

Mr. Andre Carnegie
Van Waters & Rogers, Inc
6049 Old Hwy 41A
Tampa, Florida 33619

Re: Van Waters & Roger, Inc.
FLD 020 985 727 and GAD 980 845 077
Warning Letter #240655
Hillsborough County

Dear Mr. Carnegie:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on August 7, 2000, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

You are requested to contact Raymond Wingo at (813)744-6100, extension 493, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. If after further investigation the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy of 1990, the penalties which would be assessed in this case are \$20,950.00. Costs and expenses in this case will be a minimum of \$100. If this matter cannot be resolved within 90 days, under the Department's

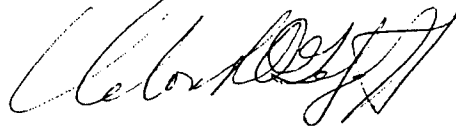
"More Protection, Less Process"

Printed on recycled paper.

Van Waters & Rogers, Inc.
FLD 020 985 727 and GAD 980 845 077
Warning Letter #240655
Page 2

agreement with the EPA, a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,



Deborah A. Getzoff
Director of District Management
Southwest District

DAG/rlw

Attachment

cc: Kelley Boatwright, Hillsborough County EPC
Jeff Pallas, US EPA Region IV
Morgan Leibrandt, HWR Section
Compliance File



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-Arranged

FACILITY NAME Van Waters & Rogers Inc.

EPA ID #'s FLD 020 985 727 and GAD 980 845 077

STREET ADDRESS 6049 Old HWY 41A, Tampa, FL 33619

MAILING ADDRESS Same

COUNTY Hillsborough PHONE 813/677/8414 DATE 8/7/2000 TIME 0830 A.M.

NOTIFIED AS: ☐ N/A

CURRENT STATUS:

- ☐ Non Handler
☐ CESQG (<100 kg/mo.)
☒ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)
☒ Transporter
☒ Transfer Facility
☐ Interim Status TSD Facility
☐ TSD Facility
Unit Type(s):
☐ Exempt Treatment Facility
☐ Used Oil:

- ☐ Non Handler
☐ CESQG (<100 kg/mo.)
☒ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)
☒ Transporter
☒ Transfer Facility
☐ Interim Status TSD Facility
☐ TSD Facility
Unit Type(s):
☐ Exempt Treatment Facility
☒ Used Oil: Transporter

2. APPLICABLE REGULATIONS:

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input checked="" type="checkbox"/> 40 CFR 273 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-737, FAC | <input type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL(s):

Andre Carnegie, Operations Manager

4. INSPECTION PARTICIPANTS:

Andre Carnegie

Ray Wingo, Gilbert T. Dembeck, FDEP

5. LATITUDE/LONGITUDE 27°52'04" 82°23'26"

6. SIC Code: 5169

7. TYPE OF OWNERSHIP: Private Federal State County Municipal

8. PERMIT #: N/A ISSUE DATE: EXP. DATE:

"More Protection, Less Process"

Printed on recycled paper.

9. PROCESS DESCRIPTION:

Van Waters & Rogers, Inc (VW&R) is a warehouse and distribution operation for commercial chemicals and is a break-bulk facility for solvents and corrosive chemicals. It also operates as a hazardous waste transfer facility for hazardous waste transported under EPA ID# GAD 980 845 077. VW&R employs 18 people.

On the south side of the facility the chlorine transfer and repackaging facility, formerly operated by VW&R, is now leased to and operated by DPC Enterprises. Since this facility is no longer associated with VW&R it is being reported as a separate inspection.

On the west side of the facility is a rail siding where bulk shipments of chemicals are brought in for unloading into dedicated storage tanks. The unloading site is over a badly deteriorated concrete pad that extends across the tracks with curbing all the way around the edge. The curbing is displaced at the tracks to allow the train cars through. The concrete pad was sloped towards the drain next to the secondary containment wall for the tank farm. There was standing water in this containment system. There was also standing water between the tracks outside the containment system. The water outside the containment system had a strong odor of chlorine, although no chlorine is unloaded in this area. A spill of caustic occurred May 5, 2000 with neutralization and cleanup performed by VW&R and a commercial clean up contractor. Documentation was on hand confirming completion of the cleanup.

On the west side of the railway spur is a storm water retention pond. The drum storage area drains into this pond. The water in the pond was an uncharacteristic opaque chocolate brown with a neutral pH. Mr. Carnegie advised the pond had been dredged recently (No time frame).

On the north side of the facility are the offices and the chemical warehouse. In the southwest corner of the warehouse building is a drumming operation. Dedicated lines carry the product to the drumming area, and dedicated hoses are used to connect these lines to the drum-filling machine. All lines are capped and the hoses are drained and sealed with caps between usage. Material drained from the hoses is placed in the product drums and no waste is generated from the operation.

On the south side of the warehouse is the designated hazardous waste storage area for both transfer facility waste and waste generated by VW&R. A large number of hazardous waste drums were stored in the designated area stacked up to three drums high, while others were stored blocking the aisle way. Since the drums that were stacked three high were stacked next to each other without aisle space examination of the drums was only possible after the forklift operator removed each drum from the stack in preparation for outbound shipment. Lack of aisle space to allow for unobstructed movement of personnel and equipment in an emergency is in violation of **40 CFR 265.35** and lack of adequate aisle space between containers of hazardous waste to allow for inspection of the condition and labels of the individual containers in violation of **62-730.160(7), F.A.C.** The hazardous waste drum storage area was not inspected weekly in violation of **40 CFR 265.174**. An unmarked over-packed drum of unknown sludge was observed in this area. Geny Fabbri advised us it was of a non-hazardous nature, and was being profiled for disposal. An open 40-pound bag of class 5.1 oxidizer, Ammonium Nitrate, was observed sitting on a steel drum against the north wall of the hazardous waste storage area. Mr. Carnegie advised that the bag was set in that area after being damaged by a forklift. The damaged bag is to be repackaged. Along the west wall near the hazardous waste storage area, 3 drums containing virgin products (1 with a Hazardous Material, 1 with Mineral Oil) were observed lying on their side with forklift holes in them.

Also in the hazardous waste storage area were 4 drums from RP Scherer Corp. (Manifest # 00804) containing "Waste, Corrosive Liquids, Flammable, N.O.S. (Acetone/Toluene)" which were not labeled with subsidiary flammable hazard class labels as required by Federal Department of Transportation (DOT) regulation, 49 CFR 172.402. A cubic yard fiber container from RP Scherer Corp. (Manifest # 20230) containing "Hazardous Waste, Solid, N.O.S. (Selenium)" was not labeled with a hazard Class 9 label as required by 49 CFR 172.402. 2 drums from Sun Hydraulics Corp. (Manifest # 89787) containing "Waste Flammable Liquids, N.O.S. (Hydrocarbons)" were not marked with the manifest document numbers as required by 49 CFR 172.304. While it is the generators responsibility for the proper labeling and marking of the containers of hazardous waste prior to offering for transport, VW&R is also in violation of DOT regulations, 49 CFR 172.402 and 49 CFR 172.304, because the transporter is responsible that the containers being transported are properly labeled and marked.

Also in the hazardous waste storage area were numerous containers of used oil that had been transported by VW&R along with the hazardous waste. Records confirmed that used oil has regularly been transported and stored at the facility. VW&R has not register as a used oil transporter or transfer facility in violation of **62-710.500(1), F.A.C.** 4 drums from Sun Hydraulics Corp. (Manifest #89787) containing "Non-Hazardous Waste (Oil Sludge)" were not marked "Used Oil" in violation of **40 CFR 279.45(g)(1)**. VW&R failed to provide secondary containment for containers of used oil stored at transfer facility in violation of **40 CFR 279.45(d)(1)**.

The eastern side of the warehouse was used for sales and distribution of pesticide products. Inside the north east corner, several cartons of damaged aerosol cans and several broken bags of pesticides were observed. Karen Watson advised us the aerosols are returned to the venders for credit and the broken bags of pesticides were given to customers at reduced or no cost.

Above the office in the southeast corner of the warehouse was a large accumulation of spent fluorescent lamps, most of which were not in containers. Russell Electric maintains the lighting systems with disposal of the spent lamps being the responsibility of VW&R. Failure to properly label these lamps or the containers in which they are stored is a violation of **62-737.400(5)(b)1., F.A.C.** In addition federal universal waste regulations require that spent mercury containing lamps be stored in closed containers.

South of the warehouse on the west half of the facility is a tank farm for corrosive and solvent products. All these tanks are provided with secondary containment. Spillage and rainwater from these containment areas is pumped to the onsite wastewater neutralization system.

South of the tank farm area is the empty drum and tote storage area. Plastic deposit drums are stored here awaiting returned to Georgia for reconditioning as are empty steel drums. 3 rusting steel drums containing liquids and marked as anhydrous alcohol 99% were observed at the very back of the north west corner of the concrete storage pad. 2 other rusting steel drums containing liquids and marked as isopropanol alcohol 90%, with the percentage marked through and changed to 70%, were observed on a pallet stacked on other drums in this same area. Mr. Carnegie advised this was virgin alcohol that was off spec and could not be sold, and that it had been written off the inventory records and given to the adjoining chlorine transfer facility to test cylinder valves. Subsequent conversations on Aug 8, 2000 with Oscar Mullins, DPC Enterprises, revealed that alcohol had not been used for cylinder valve testing for over 2 years. From the rusted condition of the drums and the fact that it remained on VW&R's property, it appears that this material has been abandoned and thus is a solid waste subject to a waste determination in accordance with **40 CFR 262.11** and proper disposal. 3 full plastic drums of "Liquichlor, 12.5%" were observed near the west retaining wall in the drum storage area. Mr. Carnegie advised this material was beyond expiration date and was going to be disposed of in the neutralization tank. 1 55-gallon drum with a top that appeared to have been pushed outward was observed to be full with unknown liquid contents. A steel "Tote" ¾'s

full of unidentified liquid had an open bung and was covered with a piece of plywood. These unknowns are also subject to waste determination in accordance with **40 CFR 262.11**.

Between the drum storage area and the chlorine facility is an in-ground concrete neutralization tank. All the drains from the tank farm secondary containment, the rail siding offload site and any spillage, leakage or contaminated rainwater is pumped into the neutralizer tank for pH adjustment prior to trucking to Tampa's POTW for disposal. According to Mr. Carnegie, neutralization is necessary because the wastewater in this tank reaches a pH as high as 13 prior to treatment.

VW&R's contingency plan was deficient in that it did not list the location, description, and capabilities of the emergency equipment as required by **40 CFR 265.52(e)**.

Transfer facility records are maintain on a computer system and appear to adequately fulfill the requirements.

10. SUMMARY OF ALLEGED VIOLATIONS:

40 CFR 262.11	Failure to determine if the containers of alcohol and unknown liquids waste meet the definition of hazardous waste.
40 CFR 265.35	Failure to maintain aisle space to allow unobstructed movement of personnel and equipment in an emergency.
40 CFR 265.52(e)	Failure to list in the facility contingency plan all emergency equipment, its location, description, and capabilities.
40 CFR 265.174	Failure to inspect areas where hazardous waste containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.
40 CFR 279.45(d)(1)	Failure to provide secondary containment for containers of used oil stored at a transfer facility.
40 CFR 279.45(g)(1)	Failure to label or mark containers used to store used oil with the words "Used Oil."
62-730.160(7), F.A.C.	Failure to maintain adequate aisle space between containers of hazardous waste to allow for inspection of the condition and labels of the individual containers.
62-710.500(1), F.A.C.	Failure to register used oil-handling activities with the Department.

62-737.400(5), F.A.C.

Failure to store universal waste lamps in closed containers marked with the words "Spent Mercury-Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps."

Report prepared by: Raymond L. Wingo Date 30 Aug 2000
Raymond L. Wingo
Environmental Specialist I

Approved by: Elizabeth Knauss Date 9/5/00
Elizabeth Knauss
Environmental Manager

PENALTY COMPUTATION WORKSHEET

Violator's Name: Van Waters & Rogers, Inc.

Identify Violator's Facility: FLD 020 985 727 and GAD 980 845 077

Name of Department Staff Responsible for the Penalty Computations: Raymond L. Wingo

Date: August 18, 2000

PART I - Class A Penalty Determinations

	Violation Type	Potential for Harm	Extent of Deviation	Matrix Amount	Multi Day	Adjustments	Total
1.	262.11	MODERATE	MODERATE	6,500			6,500
2.	265.35	MODERATE	MAJOR	9,500			9,500
3.	Combined with 62-730.160(7), F.A.C.						
4.	265.52(e)	MINOR	MINOR	300			300
5.	265.174	MINOR	MAJOR	2,250			2,250
6.	279.45(d)(1)	MINOR	MAJOR	900			900
7	279.45(g)(1)	MINOR	MAJOR	900			900
8	62-710.500	Statutory Fine		300			300
9	62-737.400(5)	MINOR	MINOR	300			300

Total Penalties for all Violations: \$ 20,950

**RANKING SYSTEM FOR POTENTIAL FOR HARM
WORKSHEET**

FACILITY NAME: Van Waters & Rogers.

VIOLATIONS: 262.11, 265.35

NATURE OF WASTE: 4

CATEGORY A = 8

CATEGORY B = 4

WASTE VOLUME: 5

MORE THAN 25 DRUMS = 8

6-25 DRUMS = 5

LESS THAN 6 DRUMS = 2

RECEPTORS: 4 + 2 = 6

DISCHARGE = 4

>1000 PEOPLE = 4

POTENTIAL DISCHARGE = 4

100-1000 PEOPLE = 3

NO DISCHARGE = 1

10-100 PEOPLE = 2

<10 PEOPLE = 1

TOTAL SCORE: 15

MAJOR POTENTIAL FOR HARM: 19-24

MODERATE POTENTIAL FOR HARM: 13-18

MINOR POTENTIAL FOR HARM: 8-12

Assigned by : Raymond L. Wingo

Date: August 18, 2000

HAZARDOUS WASTE INSPECTION EXIT INTERVIEW

FACILITY: Van Waters & Rogers

I.D. NUMBER: FLD 020 985727 DATE: 8/7/00 TIME: _____

INTERVIEW PARTICIPANTS: Andre Carnegie,

This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 62-710, 62-730, 62-737 and which adopts Federal Regulations 40 CFR Parts 260-266, 268, 270, 273, and 279 by reference. It is possible that the violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the inspector will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

- ☒ 1. Hazardous waste determination [262.11]. *2 drs, 1 tote, dr water, & Dr. IPA?*
- ☐ 2. Hazardous waste notification [262.12, 263.11 or 264/265.11].
- ☐ 3. Manifest deficiencies or recordkeeping and reporting [262/263 Subpart B or 264/265 Subpart E].
- ☐ 4. Personnel training [264/265.16 (262.34(d) for SQG)].
- ☒ 5. Contingency plan [264/265 Subpart D (262.34(d) for SQG)]. *Description of Equipment capabilities*
- ☒ 6. Preparedness and prevention [264/265 Subpart C]. *Clz Contingency at Rail Side*
- ☒ 7. Container requirements [262.34 or 264/265 Subpart I]. *Inadequate Aisle space*
- ☐ 8. Tank requirements [262.34 or 264/265 Subpart J].
- ☐ 9. Operating a treatment, storage or disposal facility without a permit [403.722 F.S., F.A.C. 62-730, Section IV].
- ☐ 10. Security requirements [264/265.14].
- ☐ 11. Groundwater monitoring [264/265 Subpart F].
- ☐ 12. Closure/Post-closure [264/265 Subpart G].
- ☐ 13. Failure to comply with the provisions of a Department issued permit or with the provisions of the Consent Order [403.727 F.S.].
- ☒ 14. Used oil and used oil filters [279 & F.A.C. 62-710]. *Not registered as transporter on manifest facility*
- ☒ 15. Mercury containing lamps and devices [F.A.C. 62-737]. *Unpackaged & Unlabeled*
- ☐ 16. Universal Waste [273].
- ☐ 17. Other Update Closure Plan

COMMENTS: Send Copy of Contingency Plan to DEP.
Transporting HW without proper placarding DOT Manifest 00804 Secondary Haz
Manifest 20232 Selenium Waste No DOT Label
Manifest 89787 No manifest # on Drum
Class

DEP INSPECTOR SIGNATURE: [Signature]

FACILITY PARTICIPANT SIGNATURE: [Signature]

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

SMALL QUANTITY GENERATOR CHECKLIST

Facility Name: Van Waters & Rogers, Inc.

Date: 7 August 2000

Facility Representative: Andre Carnegie

Facility ID # FLD 020 985 727

SIC Codes: 5169

Inspector: Raymond Wingo

40 CFR 262 Subpart A -- General Standards

1. Describe the facility's hazardous waste streams:

WASTE DESCRIPTION	EPA Waste Codes	Generation Rate	Disposal Facility and EPA ID	Correct ID?	Testing or Process Knowledge
Oil Spec Products	D001, D002 various U-codes	Var.		Yes	Product Knowledge

(describe discrepancies in waste identification in narrative)

2. Has the facility obtained an EPA ID number? [40 CFR 262.12]

Y ✓ N

3. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste?

Y ✓ N

4. Are any hazardous wastes treated or disposed of on site?
Describe in narrative.

Y ✓ N

5. Is the facility exempt from hazardous waste permit requirements?
Describe in narrative.

Y ✓ N

40 CFR 262 Subpart B -- The Manifest

1. Does the facility use the manifest for all its hazardous wastes? [262.20] Y ☒ N ☐
2. Is the facility using the correct form (EPA 8700-22; OMB #2050-0039)? Y ☒ N ☐
If no, does the generator qualify for the contractual agreement exclusion? Y ☐ N ☒ [262.20(e)]
3. Does the facility ship by water or rail? [If so, check 262.23(c)&(d)] Y ☐ N ☒
4. Is the manifest filled out properly? Y ☒ N ☐

Item No.:

- | | | | |
|--------|---|---------------------------------------|----------------------------|
| 1. | -Generator EPA ID # | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |
| | -5 digit manifest document # | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | -Generator name and mailing address | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | -Generator phone # | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5-8. | -Transporter names and ID #s | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| D-F. | -Transporter phone # (state requirement) | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 9. | -TSD name and mailing address | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 10. | -TSD # EPA ID # | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| H. | -TSD Phone # (state requirement) | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 11. | -DOT description of the waste, including hazard class, ID # and packaging group | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 12. | -Container # and type | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 13-14. | -Quantity of waste and units | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| I. | -EPA waste code (state requirement) | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| K. | -Handling codes (state requirement) | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 16. | -Name, handwritten signature of generator and date | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 17-18. | -Name, handwritten signature of transporter and date | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 19. | -Are any manifest discrepancies noted? | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 20. | -Name, handwritten signature of TSD and date | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |

Number of manifests examined Number of errors 0

Note manifest document numbers and dates of manifests with errors below:

Manifest #	Date	Destination	Error(s)

5. Have any exception reports been filed? [262.42(b)] Y ☐ N ☒
If so, did exception reports include legible copy of manifest and cover letter? Y ☐ N ☒
6. Are manifests retained for 3 years? [262.40(a)] Y ☒ N ☐

40 CFR 262 Subpart C -- Pre Transport Requirements

1. Does the facility accumulate the waste on-site prior to treatment or disposal Y ☒ N ☐?

Circle applicable accumulation units. Facilities accumulating waste in containment buildings or on drip pads are subject to LQG standards

Containers

Tanks

2. Are containers used to ship the waste off-site? Y ☒ N ☐
3. Are any containers on-site prepared for shipment? Y ☒ N ☐
- a. If so, are the containers appropriate for the waste? [262.30] Y ☒ N ☐
- b. Are the correct diamond-shaped DOT hazard class container labels used? [262.31] Y ☒ N ☐
- c. Are containers of 110 g or less marked with the correct DOT shipping name and number? Y ☒ N ☐
- Is a label with the language required under 262.32(b) used? Y ☒ N ☐
- Is the generator's name, address and manifest document number on the label? Y ☒ N ☐
- d. Are placards available to be provided to the transporter? [262.33] Y ☒ N ☐
- e. Are bulk packagings used (over 400 kg solid or 118 g liquid)? Y ☐ N ☒
- f. Are they marked and placarded properly? Y ☐ N ☒ A

40 CFR 262 Subpart C -- Accumulation Requirements

1. Does the facility comply with the 180-day accumulation time limit? Y ☒ N ☐
2. Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? [262.34(d)(1)] Y ☒ N ☐
3. If not, has the facility been issued an extension by the Department? [262.34(f)] Y ☐ N ☒ A
4. Is each container marked with the beginning date of accumulation? [262.34(a)(2)] Y ☒ N ☐
5. Is each container and tank marked with the words "Hazardous Waste"? [262.34(a)(3)] Y ☒ N ☐
6. Are satellite accumulation points used? Describe in narrative. Y ☐ N ☒
7. Are satellite containers closed [262.34(c)] and marked with the words "hazardous waste" or other words that describe the contents? Y ☐ N ☒ A
8. Do satellite accumulation points hold 55 gallons of waste or less? Y ☐ N ☒ A
9. If not, is the excess marked with the date the excess waste began accumulating? (The date must be within 3 days of the date of inspection [262.34(c)(2)]) Y ☐ N ☒ A

40 CFR 262 Subpart C -- Personnel Training -- [262.34(d)(5)(iii)]

1. Do facility personnel thoroughly familiar with proper waste handling and emergency procedures? Y ☒ N ☐
Comments, describe documentation:
2. Is the trainer adequately trained in hazardous waste management procedures? Y ☒ N ☐
3. Does the training cover safety? Y ☒ N ☐
4. Does the training cover emergency response procedures, including equipment handling and inspection? Y ☒ N ☐
5. Does the training cover hazardous waste identification and handling procedures? Y ☒ N ☐

265 Subpart C -- Preparedness and Prevention

1. Is there evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? [265.31] Y ☐ N ☒
2. Does the facility have an internal communication or alarm system? [265.32(a)] Y ☒ N ☐
3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? [265.32(b)] Y ☒ N ☐
4. Describe fire control equipment. Is it adequate? [265.32(c)] Y ☒ N ☐
5. Is spill control and decontamination equipment present? [265.32(c)] Y ☒ N ☐
6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? [265.32(d)] Y ☒ N ☐
7. Is the emergency equipment inspected and tested periodically? Frequency? annually Y ☒ N ☐
8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? [265.35] Y ☐ N ☒
9. Has the facility made emergency response arrangements with the following: [265.37]

Fire Department: _____	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
Police: _____	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
Hospital: _____	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
Emergency Response Contractor: _____	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
10. If not, has the facility attempted to do so and is the refusal documented? Y ☐ N ☒ A

Modified Contingency Plans and Emergency Response --[262.34(d)(5)]

1. Is there an emergency coordinator on site or within short driving distance of the plant at all times? Y ☒ N ☐
2. Who is the emergency coordinator? Andre Carnegie
3. Is the following information posted near the telephone:
 - a. Name and telephone number of emergency coordinator? Y ☒ N ☐
 - b. Location of fire extinguishers, spill control material and, if present, fire alarm? Y ☒ N ☐
 - c. Telephone number of fire department, if no direct alarm? Y ☒ N ☐
4. Are all employees thoroughly familiar with proper waste handling and emergency procedures as relevant to their responsibilities during normal facility operations and emergencies? Y ☒ N ☐
5. Does the emergency coordinator or his designee know what is the required response in the event of a fire, a spill which can be contained, or a fire, explosion or other release which could threaten human health outside the facility or reach surface water? Y ☒ N ☐
6. Is the emergency coordinator authorized to commit funds for incident response? Y ☒ N ☐

40 CFR 262 Subpart D -- Record keeping and Reporting

1. Is the generator keeping the following records:

Exception reports [262.42(b)] N/A ☒ Y ☐ N ☐

Test Results: N/A ☒ Y ☐ N ☐
2. Where are records kept? Facility
3. Who is in charge of keeping records? Name Andre Carnegie
4. Any additional reporting? [262.43] N/A ☒ Y ☐ N ☐
5. Are records kept for a minimum of 3 years? Y ☒ N ☐

40 CFR 262 Subpart E -- Exports N/A ☒

1. Has the facility exported any hazardous waste? Y ☐ N ☐
2. Has the exporter notified EPA 60 days prior to the initial shipment? Y ☐ N ☐
3. Has the receiving country consented to receive the waste? Y ☐ N ☐
4. Has a copy of the EPA Acknowledgment of Consent accompanied the shipment? Y ☐ N ☐
5. Did the shipment conform, and was the manifest completed as required by 40 CFR 262.54? Y ☐ N ☐
6. Has the exporter received confirmation of delivered shipment? Y ☐ N ☐
7. Are all records kept a minimum of three years? [262.57] Y ☐ N ☐

N/A

SMALL QUANTITY GENERATORS CONTAINERS STORAGE CHECKLIST**40 CFR Part 265 Subpart I - Use and Management of Containers**

(Except 265.176)

1. Are the containers in good condition? [265.171]
(Check for leaks, corrosion, bulges, etc.) Y ☒ N ☐
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Y ☒ N ☐
3. Is the waste compatible with the containers and/or its liner? [265.172] Y ☒ N ☐
4. Are the containers kept closed except when adding or removing wastes? [265.173(a)] Y ☒ N ☐
5. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? [265.173(b)] If Yes, explain using narrative. Y ☐ N ☒
- X 6. Are each of the containers inspected at least weekly? [265.174] Y ☐ N ☒
- Are records kept including: [62-730.160 (6), F.A.C.]
- | | | |
|---|---------------------------------------|----------------------------|
| Date of inspection? | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |
| Time of inspection? | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |
| Legibly printed name of the inspector? | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |
| Number of Containers? | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |
| Condition of containers? | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |
| Notes of observations made? | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |
| Date and nature of any repairs or corrective actions? | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/> |
7. Are incompatible wastes stored in the same containers? Y ☐ N ☒
8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? [265.35] Y ☐ N ☒
- X 9. Is there sufficient aisle space to allow full inspection of the containers and labels? [62-730.160(7), F.A.C.] Y ☐ N ☒

USED OIL TRANSPORTER CHECKLIST

Facility Name: Van Waters & Rogers, Inc.

Date: 7 August 2000

Facility Representative: Andre Carnegie

Facility ID # FLD 020 985 727

SIC Codes: 5769

Inspector: Raymond Wingo

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? [279.40(a)]

Y____ N ☒

On site transport?

Generator transporting < 55 g /time to a collection center?

Transporter of < 55 g /time from generator to aggregation point owned by same generator?

2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous)

Y____ N ☒

3. Does the transporter process used oil incidental to transport? [279.41]

Y ☒ N ☒

Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock?

N/A ☒ Y____ N____

If not, has the transporter conducted a hazardous waste determination? [279.10(e)]

N/A ☒ Y____ N____

4. Has the facility notified of used oil activities? Check EPA form 8700-12.

Y____ N ☒

5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? [279.43(a)]

Y ☒ N____

6. Does the transporter comply with DOT requirements? [279.43(b)]

Y ☒ N____

7. If any oil is discharged during transport, does the transporter: [279.43(c)]

Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?

Y ☒ N____

Report to DOT in writing per 49 CFR 171.16?

Y ☒ N____

Clean up any discharges until the discharge poses no threat?

Y ☒ N____

8. Does the facility also transport used oil filters?

Y____ N ☒

If so, are the filters stored in above ground containers which are: [62-710.850(6)]

In good condition?

Y____ N ☒

Closed or otherwise protected from weather?

Y____ N ☒

Labeled "Used Oil Filters"?

Y____ N ☒

Stored on an oil impervious surface?

Y____ N ☒

Transporter Recordkeeping -- 279.46

1. Do used oil acceptance records include: [279.46(a)]

Name & Address of facility providing the oil for transport?

Y ✓ N

EPA ID # of oil provider (if applicable)?

Y ✓ N

Quantity of oil accepted?

Y ✓ N

Date of shipment?

Y ✓ N

Signature of oil provider, dated upon receipt?

Y ✓ N

2. Do used oil delivery records include: [279.46(b)]

Name & Address of receiving facility or transporter?

Y ✓ N

EPA ID # of receiving facility or transporter?

Y ✓ N

Quantity of oil delivered?

Y ✓ N

Date of delivery?

Y ✓ N

Signature of oil receiver, dated upon receipt?

Y ✓ N

3. Do the above records also include state required information on the type of oil and destination or end use? [62-710.510(1)(c & e)]

Y ✓ N

~~X~~ 4. Does the facility keep records on DEP Form 62-701.900(13) or equivalent? [62-710.510(1)]

Y N ✓

~~X~~ 5. Does the facility submit an annual report on DEP Form 62-701.900(14) by March 1 summarizing the on site records for the previous calendar year? [62-710.510(5)]

Y N ✓

If not, is the facility a generator who transport only their own used oil generated at their own non-contiguous operations to their own central collection facility for storage prior to having their used oil picked up by a certified used oil transporter? [62-710.510(3)]

Y N ✓

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? [62-710.510(4)]

Y ✓ N

8. Does the transporter sell to burners or claim that any oil meets the specification? If so, complete the USED OIL MARKETER checklist.

Y N ✓

Transporter Certification -- 62-710 F.A.C.

~~X~~ 1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) [62-710.600]

Y N ✓

~~X~~ 2. Does the facility maintain training records? [62-710.600(2)(c)]

Y N ✓

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? [62-710.600(2)(d)]

Y ✓ N

~~X~~ 4. Is the facility registration form and ID number displayed? [62-710.500(4)]

Y N ✓

Transfer Facility Standards -- 279.45

- ~~X~~ 1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F

N/A Y ✓ N

Is the transfer facility registered per 62-710.500(1)(a) F. A. C.?

Y N ✓

- ~~X~~ 2 Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm?

Y N ✓

Is this done by testing?

Y N

Is this done by process knowledge? Describe basis in narrative.

Y N

Are test records or copies of records providing basis for determination kept for 3 years? [279.44(d)]

Y N

3. Have any analyses showed exceedances of the 1,000 ppm level?

Y N

If so, was the oil managed as hazardous waste?

Y N

If not, was the oil exempt? Describe in narrative.

N/A Y N

4. Is used oil stored only in tanks or containers? (Circle applicable units)

Y ✓ N

5. If the facility has tanks, do they comply with 62-761 F. A. C. rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

Y N NA

Is secondary containment provided and adequate?

Y N NA

6. Are containers, and tank trailers in good condition and not leaking?

Y ✓ N

- ~~X~~ 7. Are containers provided with secondary containment consisting of walls and floor at a minimum?

Y N ✓

Is the containment system impervious to oil so as to prevent migration?

Y N ✓

8. Are ASTs, UST tank fill lines and containers labeled "used oil?"

Y N NA

9. Are used oil filters stored more than 10 days?

If so, is the facility a registered used oil filter transfer facility? [62-710.850] N/A Y N NA

10. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?

Y ✓ N

TRANSPORTERS CHECKLIST

1. Site Name:

Van WATERS & ROGERS**Transporter Requirements (40 CFR 263)**

1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500)
2. Does transporter have an EPA identification number? (263.11(a))
3. Does the transporter use manifest system as required by 263.20?

Y ☒ N ☐Y ☒ N ☐Y ☒ N ☐

Do the manifests contain at least:

- a. Name, address, phone number, and EPA ID No. of generator?

Y ☒ N ☐

- b. Name, phone number, and EPA ID of transporter?

Y ☒ N ☐

- c. Name, address, EPA ID No. of designated permitted facility?

Y ☒ N ☐

- d. Corresponding manifest document number?

Y ☒ N ☐

- e. Description and quantity of each hazardous waste?

Y ☒ N ☐

- f. Signature of subsequent transporters?

Y ☒ N ☐

- g. Signatures signifying proper delivery or reasons why delivery could not be certified?

Y ☒ N ☐

- h. EPA waste codes?

Y ☒ N ☐

4. International shipments: (263.20(g))

NA ☒

- a. Record of date waste left U.S.?

Y ☐ N ☒

- b. Presence of one signed copy in records?

Y ☐ N ☒

- c. Signed copy of manifest returned to the generator?

Y ☐ N ☒

- d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States?

Y ☐ N ☒

5. For SQG waste:

- a. Is waste transported according to reclamation agreement?

Y ☐ N ☒

- b. Is following information recorded on a shipping paper:

Name, address, and EPA ID of waste generator

Y ☒ N ☐

- Quantity of waste accepted Y ✓ N
- DOT - required shipping info Y ✓ N
- Date waste is accepted Y ✓ N
- c. Does transporter carry this shipping paper during transport? Y ✓ N
- d. Are records maintained for three years after termination or expiration of reclamation agreement? Y ✓ N
6. Are copies of the manifest retained for 3 years? (263.22) Y ✓ N
7. Is there evidence of discharge of hazardous waste? (263.30) Y N ✓
8. Has transporter demonstrated the financial responsibility required under 62-730.170(2) Y ✓ N
9. Does the transporter verify financial responsibility with the Department annually (62-730.170(3))? Y ✓ N

Transfer Facility Requirements (62-730.171)

1. Does transporter comply with 10 day storage limit for transfer facilities? (263.12) Y ✓ N
- a.. Is the hazardous waste packaged according to 262.30? (263.12) Y ✓ N
2. General Facility Standards (265 Subpart B)
- a. Security (265.14)
- (1) Is the facility security system adequate to minimize unauthorized entry? Y ✓ N
- (2) Are signs posted and legible for 25 feet? Y ✓ N
- b. Inspection Requirement (265.15)
- (1) Does the facility have a copy of the Inspection Plan? Y ✓ N
- X (2) Does the facility have completed inspection logs? Y ✓ N
- (3) Were the deficiencies corrected in a timely manner? Y ✓ N
- (4) Are the inspection logs maintained at the facility for 3 years? Y ✓ N
- c. Personnel Training (265.16)
- (1) Do management personnel complete hazardous waste training? Y ✓ N
- Is training on the job? Y ✓ N
- Is training in the classroom? Y ✓ N

(2) Do laborers who handle hazardous waste complete training?

Y ✓ N

Is training on the job?

Y ✓ N

Is training in the classroom?

Y ✓ N

(3) Does training include:

Emergency response procedures?

Y ✓ N

Inspection procedures?

Y ✓ N

Operation of hazardous waste handling equipment?

Y ✓ N

(4) How often is training reviewed?

annually

(5) Does the facility have personnel training records including:

Job title and description of position?

Y ✓ N

Description of employee's training

Y ✓ N (6) Is training successfully completed within 6 months of hiring/
transfer to HW position?Y ✓ N

(7) Are records maintained for three years at the facility?

Y ✓ N

d. Ignitable, Reactive, or Incompatible Waste (265.17)

(1) Is the waste separated and confined from sources of ignition or
reaction, sparks, spontaneous ignition, and radiant heat?Y ✓ N

(2) Are "No Smoking" signs posted in the area?

Y ✓ N 3. Preparedness and Prevention (265 Subpart C)a. Is there evidence of fire, explosion or contamination of the
environment? (265.31 Maintenance and Operation of Facility)Y N ✓

If yes, use narrative explanation.

b. Is the facility equipped with (265.32 - required equipment):

(1) Internal communications or alarm system?

Y ✓ N

Is it easily accessible in case of emergency?

Y ✓ N (2) Telephone or two-way radio to call emergency response
personnel?Y ✓ N (3) Portable fire extinguishers, fire control equipment, spill control
equipment and decontamination equipment?Y ✓ N

Is this equipment tested to assure its proper operation?

Y ✓ N

How frequently?

annually(4) Water of adequate volume for hoses, sprinklers or water spray
system?Y ✓ N

(a) Describe source of water.

county water supply

(b) Indicate flow rate and/or pressure and storage capacity, _____
if applicable. _____

*

c. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between drums to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space)

Y _____ N ☒ _____

d. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with Local Authorities)

Y ☒ _____ N _____ NA _____

If NA, explain _____

e. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities)

Y ☒ _____ N _____ NA _____

If yes, indicate primary authority. Hillsborough County
Is the fire department a city or volunteer fire department? no

f. Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities)

Y ☒ _____ N _____

Are they readily available to the emergency coordinator?

Y ☒ _____ N _____

g. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities)

Y ☒ _____ N _____

If no, has the owner/operator attempted to do this?

Y ☒ _____ N _____

h. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37 - Arrangements with Local Authorities)

Y _____ N ☒ _____

4. Contingency Plan and Emergency Procedures (265 Subpart D)

a. Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)

Y ☒ _____ N _____

b. Is it maintained at the facility? (265.53 - Copies of Contingency Plan)

Y ☒ _____ N _____

c. Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan)

Y _____ N ☒ _____

(1) Does the plan include:

(a) Action personnel will take?

Y ☒ _____ N _____

Date: August 7, 2000

(b) Evacuation routes?

Y ☒ N ☐

(c) Emergency Equipment?

Y ☐ N ☒

(d) Is the emergency equipment properly inspected and maintained?

Y ☒ N ☐

d. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator)

Y ☒ N ☐

e. Who is the emergency coordinator?

Andre Carnegie

f. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53(b) - Content of Contingency Plan)

Y ☒ N ☐

g. Has the facility supplied DEP with a copy of the Contingency Plan? (62-730.171(2)(a))

Y ☒ N ☐

5. Container Storage Checklist (Subpart I - Use and Management of Containers 265.170)

a. Are the containers in good condition (265.171)?
(check for leaks, corrosion, bulges, etc.)

Y ☒ N ☐

b. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?

Y ☒ N ☐

c. Is the waste compatible with the containers and/or its liner? (265.172)

Y ☒ N ☐

d. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173)

Y ☐ N ☒

If yes, explain using narrative.

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

Y ☒ N ☐

If no, explain using narrative concerning the frequency of inspection.

Last Documented 7/17/2000

f. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176)

Y ☐ N ☒

If yes, explain using narrative.

g. Are incompatible wastes stored in the same containers?

Y ☐ N ☒

If yes, explain using narrative.

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

Y ☒ N ☐

If no, explain using narrative.

6. Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of

40 CFR 265.111, 265.112(c), 265.114, 265.115? (62-730.171(2)(b))

Y ☒ N ☐

Has the facility supplied DEP with a copy of the plan?

Y ☒ N ☐

7. Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground? (62-730.171(2)(d))

Y ☒ N ☐

8. Is a written log maintained for all waste entering or leaving the transfer facility? (62-730.171(2)(e))

Y ☒ N ☐

Does the log contain:

Generators' names?

Y ☒ N ☐

Manifest numbers?

Y ☒ N ☐

Dates when waste enters and leaves facility?

Y ☒ N ☐

9. Has the facility notified the Department on DEP Form 62-730.900(6) (Transfer Facility Notification Form)? (62-730.171(3))

Y ☒ N ☐

10. Does the transfer facility have an EPA/DEP identification number?

Y ☒ N ☐

Unregulated Wastes
(Household/Conditionally Exempt/Small Quantity Generator Wastes)

NA ☒

1. Does the transporter have documentation that this waste was generated by an unregulated source?

Y ☐ N ☒

2. If no, is the transporter assuming responsibility as the generator of this waste?

Y ☐ N ☒

a. If yes, complete the applicable Generator or Small Quantity Generator checklist.

b. If no, the inspector should inform the transporter that he will be held responsible as the generator of the waste and will be reinspected to ensure that the applicable requirements are being satisfied. A follow-up inspection should be scheduled as follows:

(1) 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed 1000 kg.

(2) 180 days after initial inspection if the quantity of "unregulated" wastes on site are less than 1000 kg.

3. Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)?

Y ☐ N ☒

If yes, complete the Generator checklist.

Land Disposal Restrictions

1. Does the transporter manage restricted (land ban) wastes?

Y / N

If yes, check appropriate box(es).

"California List"
F--- List Solvents
First Third
Second Third
Third Third
Soil and Debris

 /
 /
 /
 /
 /
 /