Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

October 24, 2016

Mark Larsen, Operations Manager
AERC.Com, Inc.
4317-J Fortune Place
West Melbourne, Florida 32904-1509
mlarsen@aerc.com

Re: AERC.Com
HW Facility ID FLD984262782
Brevard County

Dear Mr. Larsen:

Department personnel conducted an inspection of the above-referenced facility on July 27, 2016. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact John White at 407-897-4305 or via e-mail at John.White@dep.state.fl.us.

Sincerely,

Christine Daniel

Christine Daniel, Manager
Central District
Florida Department of Environmental Protection

Enclosures: Inspection Report

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Aerc Com Inc

On-Site Inspection Start Date: 07/27/2016 **On-Site Inspection End Date:** 07/27/2016

ME ID#: 43329 **EPA ID#:** FLD984262782

Facility Street Address: 4317 Fortune Pl Ste J, West Melbourne, FL 32904-1509

Contact Mailing Address: 4317-J Fortune Place, West Melbourne, FL 32904

County Name: BREVARD **Contact Phone:** (321) 952-1516

NOTIFIED AS:

LQG (>1000 kg/month)

TSD Facility

Transfer Facility

Transporter

INSPECTION TYPE:

Routine Inspection for TSD Facility facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Daniel Hall, Inspector; Michael Eckoff, Inspector; Mark Larsen, Operations Manager

LATITUDE / LONGITUDE: Lat 28° 5' 39.5694" / Long 80° 41' 51.624"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

On July 27, 2016, John White, Daniel Hall, and Michael Eckoff, Florida Department of Environmental Protection (FDEP), accompanied by Mark Larsen, AERC.Com, Inc. (AERC), inspected AERC for compliance with state and federal hazardous waste and universal waste regulations. AERC, located at 4317 Fortune Place, Melbourne, Florida, was inspected as a Large Quantity Generator (LQG), transporter, universal waste generator/handler, a hazardous waste transfer facility and a permitted mercury processing facility.

The facility has operated at this location since November 1993 and employs approximately 10 staff working Monday through Friday from 7:00 AM to 5:30 PM with a second shift temporarily grinding glass 2:00 PM to 10:00 PM. The City of West Melbourne provides potable water and sewer. The facility owns and operates a small fleet of trucks for transportation of universal waste. The initial RCRA mercury recycling permit was issued December 30, 1996. The current permit, 0072959-HO-004, expires December 30, 2016. A permit renewal application was received by the Department on June 30, 2016. NOTE: The permit incorrectly identifies AERC as the property owner. The property is owned by Fortune Cookie Park Inc., 4320 Woodland Park Drive, West Melbourne, Florida 32904.

AERC most recently provided the Department a Florida Notification of Regulated Waste Activity form (8700-12FL) on February 23, 2016. The facility originally notified the Department of its activities as a large quantity generator and hazardous waste treatment facility (TSD) on September 9, 1993, and received EPA identification number FLD984262782.

INSPECTION HISTORY (Past 5 Years):
AERC was last inspected by the FDEP on December 17, 2013, and was not in compliance at that time. Violations cited included; failure to mark all hazardous waste accumulation containers with an accumulation

start date; failure to mark one container of battery acid with the words “Hazardous Waste”; storing hazardous waste on-site for greater than 90 days; failure to properly label a satellite accumulation container of floor sweepings; failure to update the contingency plan with personnel changes; failure to inspect all 90-day accumulation areas weekly; failure to maintain a 12-week running average of mercury concentrations in glass waste as required by the permit; and failure to keep containers of mercury lamps closed. This was an EPA lead case and was closed without formal enforcement.

On January 24, 2013, AERC was inspected by the FDEP and was not in compliance at the time of the inspection. Violations cited included; failure to sign a manifest as the designated facility; failure to submit a biennial report in a timely manner; storage of hazardous waste in a supply area; storage of drums three rows high; storage of mercury lamps and glass in open containers; and failure to use an EPA identification number on a hazardous waste manifest. The formal enforcement case was resolved through issuance of a Consent Order, OGC #13-1248, that included $9,500 in civil penalties.

On April 20, 2011 AERC was inspected by the FDEP and was not in compliance at the time of the inspection. The facility was cited for failing to keep daily logs and failure to keep universal waste containers closed. The facility came into compliance immediately and no formal enforcement action was taken.

Process Description:

AERC has been permitted to operate a mercury containing lamp and device storage and recovery facility. The storage of mercury containing lamps and devices is limited to 223,200 lamps or 968 drums. The total storage of non-hazardous materials located outside in covered containers is a maximum of twenty-two tons. AERC also operates a 10-day transfer facility for hazardous waste destined for the AERC Pennsylvania facility, which is a permitted TSD. AERC is a large quantity generator of hazardous waste, a large quantity handler of universal waste, a universal waste transporter and a hazardous waste transporter.

The facility receives spent mercury containing bulbs and devices for the purpose of recycling. The facility crushes or dismantles and separates the lamps or devices to produce separated individual recyclable components such as glass, scrap metal and mercury containing powder (phosphor powder). A lamp recycler (LSS-1) separates the end caps, glass, shatter shields, and filaments from the phosphor powder. The metal and phosphor powder is sent to AERC Recycling Solutions, Allentown, Pennsylvania for thermal retort. At times when the LSS-1 is not working properly, the glass is put through the machine twice and then sent off to the Brevard County landfill. Samples are taken daily of the glass and end caps; composited, and sent for testing once each week. The facility cannot process lamps or devices containing liquid mercury. Items containing liquid mercury are consolidated and sent to the Pennsylvania facility.

The air filtering unit for the LSS-1 contains three sets of air filters: Pre-filters; HEPA-filters; and carbon filters. The filters are monitored on a regular basis and when the levels of mercury reach a certain level, the filters are changed. The Pre-Filters have been tested and determined to be nonhazardous. The HEPA-filters and carbon filters are disposed of as hazardous waste.

High Intensity Discharge (HID) lamps are dismantled in order to remove mercury containing ampoules from the bases. The consolidated ampoules are sent to the Pennsylvania facility.
All types of batteries are received by the facility, sorted, and consolidated into 55-gallon drums, cardboard Gaylord (cubic yard) boxes, or placed on pallets. The batteries are shipped off-site for reclamation. AERC accepts PCB and non-PCB lighting ballasts for sorting and shipment to other recycling facilities, as well as electronic scrap for demanufacturing or remanufacturing. Most electronics are managed at AERC's other Melbourne facility located at 4301 Woodland Park Drive, Suite 105, West Melbourne, Florida.

INSPECTION
Inspection of the facility began in the Receiving/Shipping area which consists of four bays with loading docks. The four loading docks are used for:

1. Largely dedicated to unloading with 90% of material passing through this bay.
2. Outbound, processed material.
3. Fiber drum storage.
4. Inbound material.

In the bay nearest the processing area, identified as number 4 above, was a trailer containing material that was being off-loaded. The material was contained in boxes on pallets and in drums. Material is generally off-

loaded the same day it arrives. Typically, an unloading operation can be done within one hour. In bay 3 was a trailer storing empty fiber drums. Bay 2, used for outbound materials, contained a yard box of processed HID lamp bases along with several pallets of lead acid batteries.

Along the back wall of the loading dock, in the shipping/receiving staging area, were six cubic yard boxes containing: aluminum end caps; CFL bases; LED lights, dated 5/12/16; scrap aluminum; CFL bases; and lead acid batteries dated 7/8/16. The box of batteries was closed; all other boxes were open. LED lamps are shipped off-site without any processing.

Emergency equipment maintained in the loading bay area included a spill kit, fire alarm pull station, three fire extinguishers (two type C and one D), and a first aid kit. In a flammables cabinet located in the loading dock were various products used within the facility including paint, aerosols, thinners, and fuel.

Loading Bay 1, which is on the east side of the warehouse, is the receiving area. Drums unloaded from trailers are labeled with an order number, storage start date, customer number, net weight, and tare weight before transfer to the storage area. Recently off-loaded was a pallet of incoming material staged on the loading dock awaiting check-in. The material included a 55-gallon drum of lead acid batteries, a 55-gallon drum of lithium ion batteries, a 55-gallon drum of dry alkaline batteries, a 5-gallon container of dry alkaline batteries, a 30-gallon drum of nickel hydride batteries, a box of dry alkaline batteries, a 5-gallon container of universal waste mercury containing devices, and a 55-gallon drum of non-PCB ballasts/capacitors. All containers were properly labeled. Before being placed in the storage area contents of containers are verified. Also located in the area of Bay 1 were eleven boxes of 6-foot lamps, one large box of 6-foot lamps, two boxes of 3-foot lamps, six boxes of 4-foot lamps, twelve boxes of 8-foot lamps, a 15-gallon container of lead acid batteries, one 55-gallon drum of lamp ballast (on the ground), and one 5-gallon of mercury containing devices.

Across from the Bay 1 Receiving Area is the Recyclables and Storage Area (Figure 1). In the area were electronics recyclables and empty containers storage. On the back wall of the area was the fire suppression sprinkler riser, a fire extinguisher, and a fire alarm pull station. The riser was last checked on 4/27/2016 and the extinguisher on 7/8/2016.

Staged in the Recyclables Area were fifteen pallets recently offloaded from the truck in bay 4 and eleven pallets of electronic waste (e-waste) containing:

- 533 pounds of CPUs
- 433 pounds of CRTs, LCDs, hard drives, keyboards and miscellaneous e-waste
- 512 pounds of CPUs, printers, and modems
- A single 113 pound projection TV
- 384 pounds of CRTs, LCDs, and miscellaneous e- waste
- 360 pounds of CRTs, Printers & fax machines, and miscellaneous e-waste
- 364 pounds of CPUs, CRTs, and fax/printers
- 475 pounds of CPUs, DVD players, VCRs, fax/printers, miscellaneous e-waste and a coffee machine
- 332 pounds of CRTs, a vacuum cleaner, CPUs, a keyboard, and miscellaneous e-waste
- 797 pounds of CPUs (server blades), printer/fax, and LCDs
- 525 pounds of CPUs, LCDs, and miscellaneous e-waste

After unloading and check-in, materials are moved to the appropriate location within the warehouse Storage Area. This area includes a battery processing area, a bank of air filters associated with the LSS-1 processing equipment, a 10-day transfer area, a 90-day storage area, a HID lamp processing area, and storage for used mercury lamps awaiting processing.

Located at the southeast corner of the main storage area is the Battery Processing Area (Figure 2). AERC accepts lead-acid, lithium ion, nickel metal hydride, nickel cadmium, and alkaline batteries for recycling. Fluid is removed from leaking batteries and placed in the appropriate acid or base accumulation drum in the satellite accumulation area. In the satellite accumulation area were three 55-gallon poly drums. One drum contained sodium hydroxide, another sulfuric acid, and the last contained non-hazardous mineral oil. All containers were properly labeled with words identifying the contents and closed. A spill kit was located next to the drums. Also in the area was a pallet of lead acid batteries being prepared for shipment off-site. Approximately 70 feet away is a safety shower/eye wash station.

No hazardous waste was stored in the 10-day transfer area at the time of this inspection (Figure 3). In an area adjacent to the 10-day transfer area were drums and containers of mercury containing devices to be shipped to AERC's Allentown facility for processing. In the area were six 55-gallon drums, one 30-gallon drum, one 5-gallon container, one 2.5-gallon container, and one cardboard box of mercury containing devices.

In the 90-day storage area was one cardboard box of hazardous waste containing HID lamps and phosphor powder. The cardboard box was properly labeled "Hazardous Waste" and closed but was not marked with an accumulation start date. Upon further investigation, Mr. Larsen determined the box was improperly located in the 90-day storage area, it should have been located in a satellite accumulation area for sump pump/bilge pump floats processing area where mercury switches are removed. All other containers were properly labeled "Hazardous Waste," marked with accumulation start dates, and were closed. Also in the area were four 55-gallon drums, one yard box, and one 55-gallon drum of non-hazardous waste.

In the HID processing area, mercury ampoules are removed from lamps. HID lamps are processed in a unit with a grate that has a down draft vent in case mercury is released during the process. Lamps are broken over the grate with the glass falling through to a catch pan. The mercury ampoule is then removed from the filament with snips. The ampoule is placed in a 55-gallon drum in a satellite accumulation area. The drum was properly labeled "Hazardous Waste" and was closed. After further discussions, Mr. Larsen stated the drum will be re-labeled "Universal Waste Mercury Containing Devices." The broken glass is disposed in the trash and the metal base/filament is recycled as scrap. The HID processing unit is equipped with a filter. The filter is periodically replaced after testing with a Jerome meter if the meter detects any concentration of mercury. The waste filter is placed in a cubic yard box of filters/floor sweepings that is labeled "Hazardous Waste." When full, the box is sent to the Allentown facility for retort.

There were ten rows of waste and recyclable materials stored in the warehouse storage area. An inventory of the materials is listed below beginning from the south side of the warehouse moving to the north side of the warehouse.

Row 1 held 26 containers with 7,185 lbs. of PCB and non-PCB lamp ballasts. The oldest container date was 5/27/2016.
Row 2 held 62 containers with 2,147 lbs. of PCB and non-PCB lamp ballasts and universal waste batteries. The oldest container date was 6/10/2016.
Row 3 held 28 containers with 2,147 lbs. of universal waste batteries. The oldest container date was 4/8/2016.
Row 4 held 74 containers with 14,541 lbs. of universal waste batteries. The oldest container date was 12/3/2015.
Row 5 held 25 containers with 10,039 lbs. of lead acid batteries. The oldest container date was 2/1/2016.
Row 6 held 76 containers with 30,270 lbs. of universal waste lamps. The oldest container date was 2/19/2016.
Row 7 held 3 containers with 560 lbs. of universal waste lamps. The oldest container date was 3/30/2016.
Row 8 held 5 pallets with 3,414 lbs. of universal waste lamps. The oldest container date was 3/1/2016.
Row 9 held 4 pallets with 1,229 lbs. of universal waste lamps. The oldest container date was 6/28/2016.
Row 10 held three pallets with 1,867 lbs. of universal waste lamps. The oldest container date was 5/24/2016.

Located in Row 8 was one 55-gallon drum of crushed glass with a damaged, unsecured drum ring in apparent violation of 40 CFR 264.171 (Figure 7). The drum ring was secured during the inspection.

Located in Rows 8 and 9 were a total of seven EasyPak boxes of compact fluorescent universal waste lamps. These are prepaid shipping containers received from off-site by common carriers such as Federal Express or UPS. AERC is not yet able to track these containers with the facility's computer based operations log. The containers are tracked via the shipping label that came attached to each container. The facility will have to ensure these containers are managed in accordance with the permit.

The volume of waste stored in each row, which is specified in Item D.4. Storage Area Capacity in the permit application, did not exceed the limits identified in permit number 0072959-HO-004.

Production / Processing Area:
The lamp processing equipment, LSS-1, was not operating at the time of the inspection. The processing equipment operates four or five days per week. The lamp processing equipment has a 55-gallon drum

labeled “Hazardous Waste” accumulating phosphor powder and a 5-gallon container labeled “Hazardous Waste” accumulating glass fines (Figure 8). Both containers are directly connected to the processing equipment. Lamp end caps drop into a cubic yard cardboard box and glass is discharged into a hopper. The air handler is equipped with high-efficiency particulate arrestance (HEPA) carbon filters. The carbon is replaced as necessary which is typically annually. A Jerome mercury vapor analyzer is used to assist in making that determination.

Two 55-gallon drums directly connected to the filter housing were accumulating phosphor powder from the filter blow-down for the vacuum filter (Figure 9). Both drums were properly labeled “Hazardous Waste.” One drum was incorrectly marked with an accumulation start date of 3/5/2015. This drum was also dented at the bottom, was not in good condition, and had visible signs of phosphor powder and glass around its base (Figure 10).

Ductwork leading from the LSS-1 filter system is connected to a bank of filters located in the warehouse storage area. There was a visible gap in the ductwork (Figure 11). It was requested the gap be repaired. There were visible signs of phosphor powder on, and around, the processing equipment and the equipment shows visible signs of repair. There was also phosphor powder around a compressor that is located adjacent to the bay door.

Approximately fourteen pallets of lamps were staged in the processing area (Figure 12). The oldest accumulation date on the material appeared to be 9/23/15. While the material was clearly staged for processing, some of the containers were open. It is requested the facility ensure containers are kept closed until lamps are to be removed to reduce the chance of breakage.

Outside the processing area bay door is the staging area for the roll-off container accumulating processed glass. The container stores glass generated by the lamp processing equipment. Once sampling of the glass has documented the glass does not exhibit a hazardous waste characteristic of toxicity, the glass is disposed of at a Subtitle D, non-hazardous waste landfill. The tarp that is supposed to completely cover the roll-off container was not adequate and did not meet the requirements of permit condition Part II Subpart B, Specific Operating Conditions Number 1 which requires compliance with Rule 62-730.800(9), F.A.C., which requires containers be closed, covered, and sealed. The tarp was just laying over the glass in the roll-off container (Figure 13). At one end of the roll-off is a door that goes top to bottom and side to side, a gap was visible around the door which would allow rain water to drain out (Figure 14).

A second roll-off of crushed glass was noted to the east of the first (Figure 15). The second roll-off was covered with a black tarp but the tarp was stretched and sagging into the roll-off and had multiple holes that will allow water to enter (Figure 16). The tarp was not adequate and did not meet the requirements of permit condition Part II Subpart B, Specific Operating Conditions Number 1 which requires compliance with Rule 62-730.800(9), F.A.C. Storm drains near the loading dock and roll-offs were inspected and no signs of glass were noted entering the stormwater conveyance.

RECORDS:
A review of the facility’s contingency plan found no issues. Weekly inspection logs were reviewed and no issues were noted. Notifications of local authorities, as required by 40 CFR 264.37(a) and 265.37(a), were completed 6/17/2016. Review of the adequacy of financial assurance and closure cost estimates were completed by the Department on 1/15/2016. Training for staff was complete and up to date.

A review of manifests for incoming loads noted the facility signs off on the loads within one to two days. No issues were noted with the manifests. A review of outgoing manifests found mercury containing wastes generated by the facility are shipped to AERC.COM located in Allentown, Pennsylvania, EPA identification number PAD987387216. The hazardous waste transporter used by the facility is Freehold Cartage, EPA identification number NJD054126164.

A review of the weekly and twelve week running average for mercury content in recovered materials (i.e., glass, metal) is required by the facility’s permit 0072959-HO-004, Part II, Item B. 10. During a review of the sampling logs it was noted the facility is correctly sampling materials on a daily basis and collecting composite samples on a weekly basis; however, the samples are only forwarded for laboratory analysis every two weeks. Part II Item B (8) requires the sample be analyzed weekly in order to maintain a correct 12-week running average. The facility is currently using ALS Environmental of 9143 Phillips Highway, Suite 200, Jacksonville, Florida, for laboratory analysis. Based on permit requirements, analysis of the waste materials

should be for total mercury, reported in mg/kg, but the analysis provided by the laboratory is for TCLP mercury, reported in mg/L. Based on the use of the incorrect laboratory method the weekly and 12-week rolling average for glass samples could not be verified. This issue was corrected immediately following the inspection. It was also noted the sample collection log is not consistently being signed as required.

Facility Areas:

Bulb Storage Area:

Universal waste lamps are stored in several rows in the warehouse. Please refer to the appropriate section of the report for further information.

90-Day Storage Area and 10-day Transfer Area:

This area is for wastes that are generated on-site and off-site wastes that are consolidated and sent to the Pennsylvania facility for final disposal. Please refer to the appropriate section of the report for further information.

Battery Storage Area:

At the time of the inspection approximately one third of the warehouse was being used for waste batteries managed as universal waste. Batteries are sorted and consolidated by type. Please refer to the appropriate section of the report for further information.

New Potential Violations and Areas of Concern:

Violations

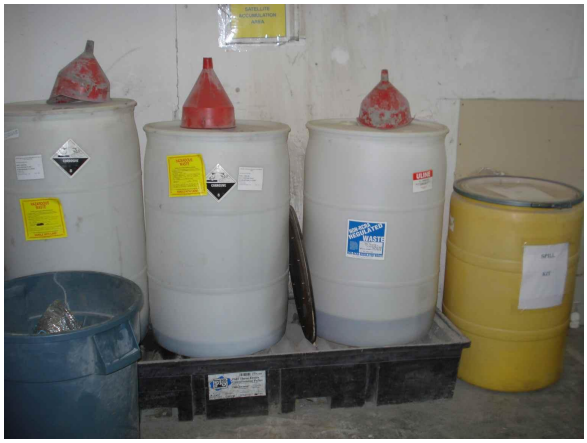
Type:	Violation
Rule:	62-737.800(9)
Explanation:	Separated glass and metal that is stored outdoors shall be stored in covered, watertight containers or in a manner that otherwise prevents contact with water and prevents the release of hazardous materials into the environment. Two 20-cubic yard roll-off containers used to store non-hazardous processed glass had tarps that did not cover the roll-off containers. This would allow rain water to enter the containers resulting in a discharge to the environment.
Corrective Action:	AERC must ensure containers storing separated glass and metal outdoors are provided with watertight covers.

Type:	Violation
Rule:	264.171
Explanation:	If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of this part. Specifically, a container of crushed glass located in the storage area had a damaged lid and drum ring.
Corrective Action:	AERC must ensure containers that are found with damage to the container, lid, or drum ring, are managed appropriately and the container or damaged portion of the container replaced. The lid and drum ring of the damaged crushed glass container were replaced during the inspection.

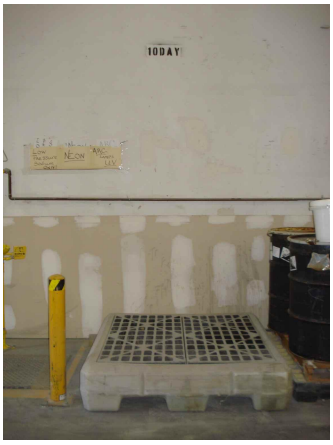
PHOTO ATTACHMENTS:

1. Recyclables and Electronics

2. Battery Processing Waste Containers



3. 10-Day Transfer Area

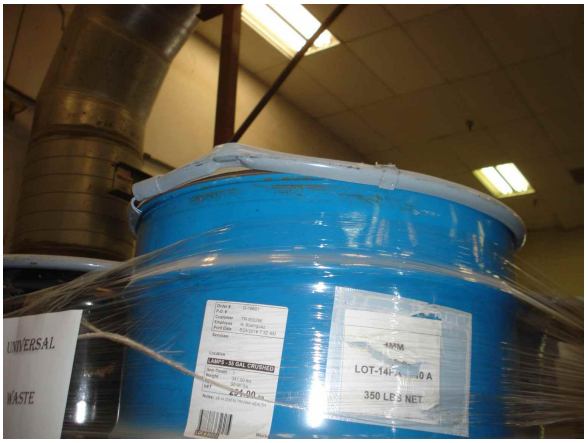


4. 90-Day Storage Area

5. 90-Day Storage Area

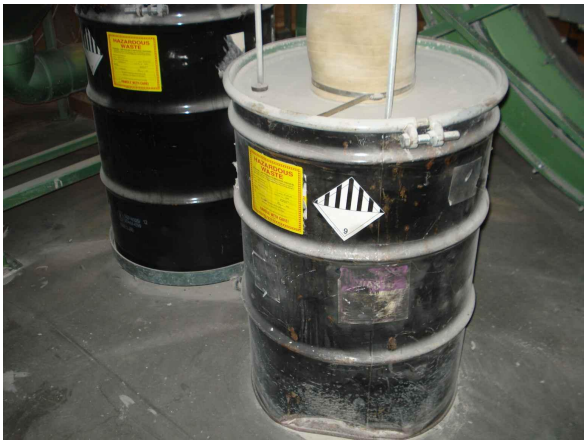
6. 90-Day Storage Area

7. Crushed glass drum with damaged ring

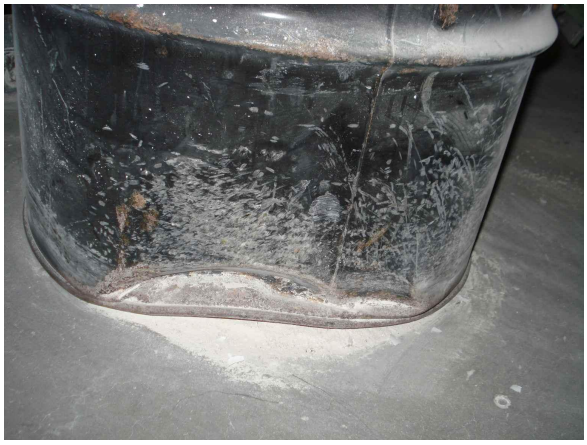


8. Containers collecting waste from processing equipment

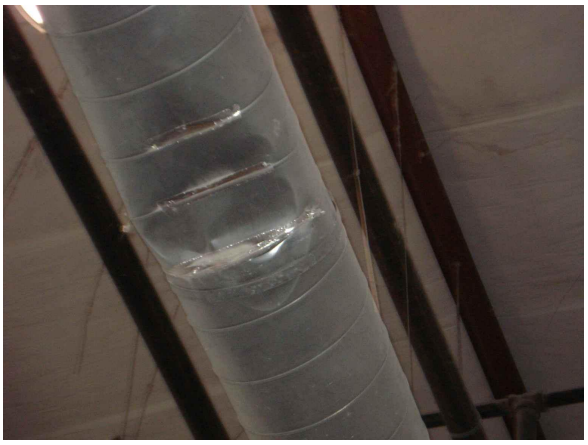
9. Drums collecting phosphor powder from filters



10. Damaged phosphor powder drum



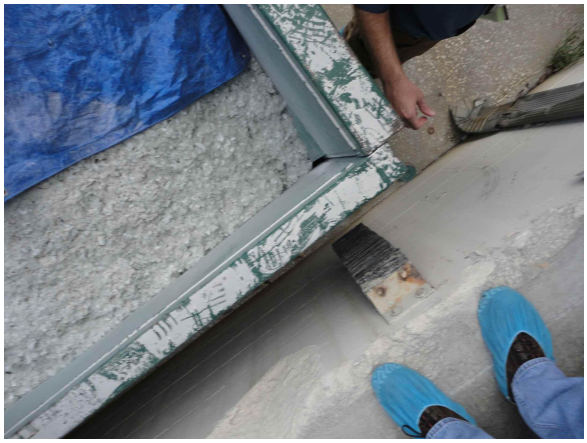
11. Damaged vent pipe



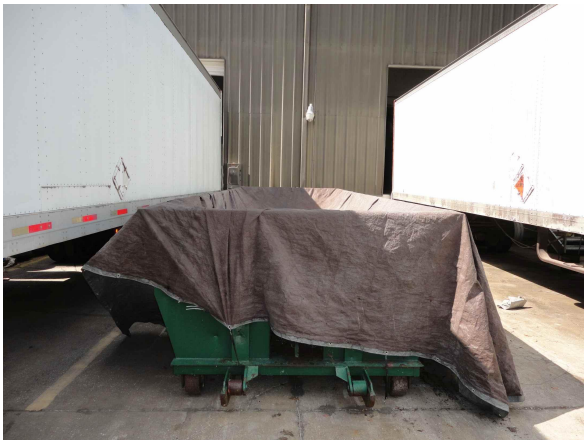
12. Materials for processing

13. Processed glass roll-off

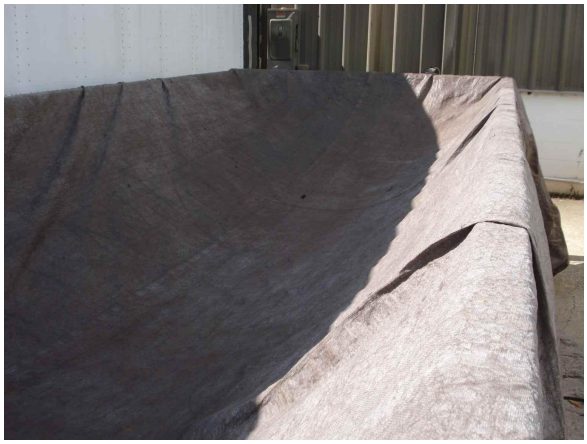
14. Processed glass container gate - not sealed



15. Processed glass roll-off container



16. Tarp over processed glass container is not water tight



Conclusion:

Upon completion of the inspection, an out briefing was held with Mark Larsen, Operations Manager. AERC Recycling Solutions was inspected as a Large Quantity Generator (LQG), transporter, universal waste generator/handler, a hazardous waste transfer facility and a permitted mercury processing facility and was not in compliance at the time of this inspection.

4.0 - Large Quantity Generator Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	40 CFR 262 Subpart A - General Standards	Yes	No	N/A
4.1	Has the facility properly identified all hazardous waste streams? 262.11	✔		
4.2	Did the facility obtain an EPA ID Number prior to treating, storing, disposing, or transporting hazardous waste? 262.12(a)	✔		
4.4	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)			✔
Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A
4.21	Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are not in compliance) 262.20(a)(1) ☐ Item 1. Generator's U.S. EPA Identification Number ☐ Item 2. Page 1 of "X" (total number of pages used to complete the manifest) ☐ Item 3. Emergency Response Phone Number ☐ Item 4. Manifest Tracking Number ☐ Item 5. Generator's Mailing Address, Phone Number and Site Address ☐ Item 6. Transporter 1 Company Name & U.S. EPA ID Number ☐ Item 7. Transporter 2 Company Name & U.S. EPA ID Number ☐ Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number ☐ Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group. ☐ Item 10. Containers (Number and Type) ☐ Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates) ☐ Item 12. Units of Measure (Weight/Volume) ☐ Item 13. Waste Codes. Enter up to 6 of the most representative waste codes. ☐ Item 14. Special Handling Instructions and Additional Information ☐ Item 15. Generator's / Offeror's Certifications ☐ Item 16. International Shipments (Import or Export must be noted) ☐ Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt) ☐ Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility) ☐ Item 19. Hazardous Waste Report Management Codes (On returned copies only) ☐ Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)	✔		
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✔		
4.23	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✔		
4.24	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✔		
4.25	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✔		
4.26	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23.(c)			✔

Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A
4.27	For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) ☐ The next non-rail transporter? ☐ The Designated Facility if transported solely by rail? ☐ The last rail transporter to handle the waste in the U.S. if exported by rail?			✓
4.28	If the generator did not receive a signed return copy of the manifest from the designated facility within 35 days of shipment, did the generator contact the transporter and/or designated facility? 262.42(a)(1)			✓
4.29	If the generator did not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, did the generator file an exception report? 262.42(a)(2)			✓
4.30	If an exception report was submitted did it include a legible copy of manifest? 262.42(a)(2)(i)			✓
4.31	If an exception report was submitted did it include a cover letter signed by the generator explaining efforts taken to locate the waste and the results of those efforts? 262.42(a)(2)(ii)			✓
4.32	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
4.34	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)			✓
Item No.	40 CFR 262 Subpart C -- Pre Transport Requirements	Yes	No	N/A
4.35	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
4.36	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓
4.37	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
4.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are not in compliance) 262.32(b) ☐ Generator's Name and Address? ☐ Generator's EPA ID Number? ☐ Manifest Tracking Number?			✓
4.39	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	40 CFR 262 Subpart C -- Accumulation Requirements	Yes	No	N/A
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.34(b)	✓		
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 265.111? 265.111			✓
4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 265.114? 265.114			✓
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.34(a)(2)	✓		
4.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.34(a)(2)	✓		
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.34(a)(3)	✓		
4.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.34(c)(1)	✓		
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.34(c)(1)	✓		
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.34(c)(1)(i), 265.171	✓		
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.34(c)(1)(i), 265.172	✓		
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.34(c)(1)(i), 265.173(a)	✓		
4.54	Has the generator marked satellite containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers? 262.34(c)(1)(ii)	✓		
4.56	If YES, within 3 days did the generator mark an accumulation start date on the excess waste container? 262.34(a)(2)			✓

Item No.	40 CFR 262 Subpart C -- Accumulation Requirements	Yes	No	N/A
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.34(a)(3)			✓
Item No.	**40 CFR 265 Subpart I -- Use and Management of Containers**	**Yes**	**No**	**N/A**
4.58	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 265.171	✓		
4.59	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 265.172	✓		
4.60	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 265.173(a)	✓		
4.61	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 265.173(b)	✓		
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 265.174	✓		
4.63	Does the generator properly document the weekly inspections? 62-730.160(5)	✓		
4.65	Does the generator ensure ignitable and/or reactive wastes are not stored closer than 50 feet to the facility's property line? 265.176	✓		
4.66	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 265.177(a), 265.17(b)			✓
4.67	If the facility places hazardous waste in an unwashed container that previously held incomplatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 265.177(b), 265.17(b)			✓
4.68	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 265.177(c)			✓
Item No.	**40 CFR 265.16 -- Personnel Training**	**Yes**	**No**	**N/A**
4.69	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 265.16(a)(1)	✓		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 265.16(a)(2)	✓		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 265.16(a)(2)	✓		
4.72	Is the training program designed to ensure facility personnel respond effectively to emergencies and did not fail to cover emergency procedures and equipment? 265.16(a)(3)	✓		
4.73	Does the generator conduct training within 6 months of hire or within 6 months of an employee moving to a new position that requires training? 265.16(b)	✓		
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 265.16(b)	✓		
4.75	Does the generator review training annually, at least once each calendar year? 265.16(c)	✓		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 265.16(d)(1)	✓		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 265.16(d)(2)	✓		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 265.16(d)(3)	✓		
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 265.16(d)(4)	✓		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 265.16(e)	✓		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 265.16(e)	✓		
Item No.	**40 CFR 265 Subpart C -- Preparedness and Prevention**	**Yes**	**No**	**N/A**
4.82	Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? 265.31	✓		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 265.32(a)	✓		
4.84	Does the facility provide a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 265.32(b)	✓		
4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 265.32(c)	✓		

Item No.	40 CFR 265 Subpart C -- Preparedness and Prevention	Yes	No	N/A
4.86	Does the facility provide and maintain water at adequate volume and pressure available to supply waterhose streams, foam producing equipment, automatic sprinklers, or water spray systems? 265.32(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 265.33	✓		
4.88	When hazardous waste is being handled, does the facility ensure all personnel involved have immediate access to an internal alarm or communication device? 265.34(a)	✓		
4.89	If only one employee is on premises while the facility is operating, does the facility ensure the employee has immediate access to a telephone or 2-way radio to summon external assistance? 265.34(b)	✓		
4.90	Does the facility maintain adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility in an emergency? 265.35	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 265.37(a)(1)	✓		
4.92	Where more than one police or fire department may respond, has the facility designated a primary emergency police and/or fire authority? 265.37(a)(2)			✓
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 265.37(a)(3)	✓		
4.94	Has the facility attempted to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries that could result? 265.37(a)(4)	✓		
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 265.37(b)			✓
Item No.	40 CFR 265 Subpart D -- Contingency Plan and Emergency Procedures	Yes	No	N/A
4.96	Does the facility have a contingency plan? 265.51(a)	✓		
4.97	In the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents did the facility implement the contingency plan implemented immediately? 265.51(b)			✓
4.99	Fires? 265.52(a)	✓		
4.100	Explosions? 265.52(a)	✓		
4.101	Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? 265.52(a)	✓		
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 265.52(b)	✓		
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 265.52(c)	✓		
4.104	Does the plan list names, addresses (office & home), and phone numbers (office & home) of emergency coordinator(s)? 265.52(d)	✓		
4.105	Does the plan identify the primary emergency coordinator and list alternates in order the they will assume responsibility? 265.52(d)	✓		
4.106	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 265.52(e)	✓		
4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 265.52(f)	✓		
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 265.53(a)	✓		
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 265.53(b)	✓		
4.110	Has the facility updated the contingency plan with changes in emergency coordinators, facility design, construction, or operations, emergency equipment, plan failure in an emergency, or applicable regulations? 265.54	✓		
4.111	Has the facility designated an emergency coordinator either on premises or on call who is able to reach the facility in a short period of time and able to commit funds for incident response? 265.55	✓		
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 265.56? 265.56			✓
Item No.	Record Keeping and Reporting	Yes	No	N/A
4.113	If the contingency plan has been implemented, did the owner or operator submit a written report to the Department within 15 days documenting the incident? 265.56(i)			✓
4.114	Does the generator keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for 3 years from the date the waste was last shipped off-site? 262.40(c)	✓		
4.115	Has the generator submitted a biennial report by March 1 of each even numbered year covering activities during the previous year? 262.41(a)	✓		
4.116	Does the generator maintain a copy of the biennial report for at least 3 years from the due date of the report? 262.40(b)	✓		

Item No.	Record Keeping and Reporting	Yes	No	N/A
4.118	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was inteneded to be shipped off-site? 262.53(a)			✓
4.120	If YES, did the generator meet all of the requirements of 40 CFR 262.60? 262.60			✓
Item No.	40 CFR Part 268 -- Land Disposal Restrictions	Yes	No	N/A
4.5	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
4.7	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
4.8	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
4.9	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
4.10	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			✓
4.11	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			✓
4.12	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
4.13	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)	✓		
4.14	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			✓
4.15	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)	✓		
4.16	If the generator choses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)	✓		
4.17	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
4.18	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)	✓		
4.20	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

John E. White	Inspector
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
JW	DEP / 09/28/2016
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION** / **DATE**

Daniel Hall	Inspector
Inspector NAME	**Inspector TITLE**
	DEP
	ORGANIZATION

Michael Eckoff	Inspector
Representative NAME	**Representative TITLE**
	DEP
	ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Mark Larsen	Operations Manager
Representative NAME	**Representative TITLE**
	AERC.COM Inc
	ORGANIZATION

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Report Approvers:

Approver: Christine Daniel **Inspection Approval Date:** 09/28/2016