FACILITY LESB
I.D. NUMBER FLD 980 729 610
PATS NUMBER HO58-292488
TYPE OF APPLICATION
DATE
REVIEWER

SUBMITTALS	REF. NO	DATE	REVIEWER
	1		
	2		
	3		

REF. NO	PAGE	17-30.401(2) Part I §270.13	COMP.	INCOMP.	COMMENTS
	1-1	A. GENERAL INFORMATION A-1 TYPE OF FACILITY §270.13(a)	✓		storage - Containers and tanks Treatment - tank and miscellaneous units
	1-1	A-2 TYPE OF APPLICATION	✓		Operation
	1-1	A-3 DATE OPERATION BEGAN §270.13(g)	✓		3-10-1987
	1-1	A-4 FACILITY NAME §270.13(b)	✓		Laidlaw Env Svc of Bartow
	1-1	A-5 EPA/DER I.D. NUMBER	✓		
	1-1	A-6 FACILITY LOCATION §270.13(b)	✓		
	1-1	A-7 FACILITY MAILING ADDRESS §270.13(b)	✓		
	1-2	A-8 FACILITY CONTACT NAME PHONE TITLE ADDRESS	 ✓ ✓ ✓ ✓		
	1-2	A-9 OPERATOR'S NAME §270.13(d)	✓		
	1-2	A-10 OPERATOR'S ADDRESS §270.13(d)	✓		

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REF. NO	PAGE	17-30.401(2) Part I	COMP.	INCOMP.	COMMENTS
	1-2	A-11 FACILITY OWNER'S NAME §270.13(e)	✓		
	1-2	A-12 FACILITY OWNER'S ADDRESS §270.13(e)	✓		
	1-2	A-13 LEGAL STRUCTURE A-14 COUNTY-STATE REGISTRATION	✓		
	1-2	A-15 STATE OF INCORPORATION	✓		Florida
	1-2 ↔ 1-2	A-16 PARTNERSHIP OWNERS NAMES ADDRESS			NA
	1-3	A-17 SITE OWNERSHIP STATUS LAND OWNER'S LAND OWNER'S ADDRESS	✓ ✓ ✓		~~owned~~ leased Bartow Municipal Airport
	1-3	A-18 ENGINEER NAME REGISTRATION NUMBER ADDRESS ASSOCIATION	 ✓ ✓ ✓		 Robert Fox ERM South - Tampa
	1-3	A-19 INDIAN LAND §270.13(f)	✓		No
	1-3	A-20 EXISTING ENVIRONMENTAL PERMITS §270.13(k)	✓		
	1-4	B. SITE INFORMATION B-1 FACILITY LOCATION COUNTY §270.13(b) NEAREST COMMUNITY LATITUDE LONGITUDE	 ✓ ✓ ✓ ✓		

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	1-4	B-2 AREA OF FACILITY SITE	✓		
	1-4	B-3 SCALE DRAWING AND PHOTOGRAPHS §270.13(h)		✓	SEE ALSO APPENDICIES A AND B no date
	1-4	B-4 TOPOGRAPHIC MAP §270.13(1) MAP SCALE AND DATE 100- YEAR FLOODPLAIN AREA ORIENTATION OF THE MAP SURFACE WATER BODIES WITHIN 1/4 MILE OF THE FACILITY PROPERTY BOUNDARY SURROUNDING LAND USES LEGAL BOUNDARIES OF THE FACILITY INJECTION WELLS DRINKING WATER WELLS INTAKE AND DISCHARGE STRUCTURES	✓ ✓ ✓ ✓	✓ ✓ ✓ ✓ ✓	SEE ALSO APPENDIX D Appendix E
	1-4	B-5 FLOOD PLAIN	✓		Appendix E
	1-4	C. LAND USE INFORMATION C-1 ZONING	✓		
	1-4	C-2 ZONING CHANGES	✓		N/A
	1-4	C-3 PRESENT LAND	✓		
	1-4	D OPERATING INFORMATION D-1 WASTE GENERATED ON SITE §270.13(c)	✓		
	1-4	D-2 DESCRIPTION OF OPERATION §§270.13(i) and (m)	✓		SEE ALSO APPENDIX ~~E~~ F
	1-5	D-3 PROCESS CODE §270.13(j) DESIGN CAPACITY AND UNITS EPA HAZARDOUS WASTE NUMBER ANNUAL QUANTITY AND UNITS	✓		SEE ALSO APPENDIX ~~E~~ F G

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REF. NO	PAGE	17-30.401(2) Part II - A - GENERAL §270.14	COMP.	INCOMP.	COMMENTS
	Chapter 1 Appendix D	1 A. TOPAGRAPHIC MAP 1" TO 200' §270.14(b)(19) MAP SCALE AND DATE 100 - YEAR FLOODPLAIN AREA ORIENTATION OF THE MAP ACCESS CONTROL INJECTION AND WITHDRAWAL WELLS BUILDING AND OTHER STRUCTURES CONTOURS LOADING AND UNLOADING AREAS DRAINAGE OR FLOOD CONTROL RUNOFF CONTROL SYSTEM LOCATION OF TSD AREAS PAST, PRESENT, FUTURE LOCATION OF SOLID WASTE MANAGEMENT UNITS	✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓	 ✓ ✓ 	
	Chapter 1 Appendix D	B. WIND POSE WIND SPEED DIRECTION LEGEND DATE		✓ ✓ ✓ ✓ ✓	
	Chapter 1 Appendix C	C. TRAFFIC PATTERNS §270.14(b)(10) VOLUME PATTERN CONTROL ACCESS ROADS LOAD - BEARING CAPACITY ROAD SURFACES	 ✓ ✓ ✓ ✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	Chpt. 10 10-5 10-6	2 FINANCIAL RESPONSIBILITY INFORMATION CALL TALLAHASSEE TO GET INFORMATION ON COMPLETENESS OF FINANCIAL.		✓	
	Chpt. 1 Apdx. E	3 FLOOD MAP §270.14(b)(11) DOCUMENTATION OF WHETHER OR NOT THE FACILITY IS LOCATED WITH A 100-YR FLOODPLAIN INCLUDING THE SOURCE OF DATA (FEDERAL INSURANCE ADMINISTRATION MAP OR OTHER MAPS AND CALCULATIONS). IF MAP OTHER THAN FIA MAP IS USED DEMONSTRATION OF EQUIVALENT MAPPING TECHNIQUE SHOULD BE PROVIDED. IF LOCATED IN 100-YR FLOODPLAIN INCLUDE: ° 100-YR FLOODPLAIN LEVEL ° OTHER SPECIAL FLOODING FACTORS (E.G., WAVE ACTION) THAT MUST BE CONSIDERED TO PREVENT WASHOUT. <u>DEMONSTRATION OF COMPLIANCE</u> FOR FACILITIES LOCATED WITHIN THE 100-YR FLOOD-PLAIN, A DESCRIPTION OF HOW THE FACILITY IS DESIGNED, CONSTRUCTED, OPERATED, AND MAINTAINED TO PREVENT WASHOUT OF ANY HAZARDOUS WASTE DURING A FLOOD. EITHER OF THE FOLLOWING MAY BE USED: <u>FLOOD PROOFING AND FLOOD PROTECTION</u> A STRUCTURAL OR OTHER ENGINEERING STUDY SHOWING HOW DESIGN OF HAZARDOUS WASTE UNITS AND THE FLOOD PROOFING AND PROTECTION DEVICES AT THE FACILITY WILL PREVENT WASHOUT INCLUDING:	✓	✓	Source of information NA

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	Chpt. 1 Apdx. E	° ENGINEERING ANALYSIS OF HYDRODYNAMIC AND HYDROSTATIC FORCES ° STRUCTURAL OR OTHER ENGINEERING STUDIES OF HAZARDOUS WASTE UNITS AND FLOOD PROTECTION DEVICES. <u>FLOOD PLAIN</u> DESCRIPTION OF THE PROCEDURES TO BE FOLLOWED TO REMOVE HAZARDOUS WASTE TO SAFETY BEFORE THE FACILITY IS FLOODED. THE PLAN MUST ADDRESS THE FOLLOWING: ° TIMING RELATED TO FLOOD LEVELS ° ESTIMATED TIME TO MOVE THE WASTE ° DESCRIPTION OF THE LOCATION TO WHICH THE WASTE WILL BE MOVED MOVED AND PROOF OF THE RECEIVING FACILITY'S ELIGIBILITY TO RECEIVE HAZARDOUS WASTE ° PROCEDURES, EQUIPMENT, AND PERSONNEL TO BE USED AND THE MEANS TO ENSURE THAT THESE RESOURCES WILL BE AVAILABLE ° POTENTIAL FOR ACCIDENTAL DISCHARGE OF THE WASTE.			NA
	Chpt. 3	4 FACILITY SECURITY INFORMATION a) DESCRIPTION OF SECURITY §§264.14 and 270.14(b)(4) SECURITY PROCEDURES AND EQUIPMENT UNLESS A WAIVER IS GRANTED, THE FACILITY MUST DEMONSTRATE THE FOLLOWING: 24-HOUR SURVEILLANCE SYSTEM §264.14(b)(1) A 24-HOUR SURVEILLANCE SYSTEM THAT CONTINUOUSLY MONITORS AND CONTROLS ENTRY ONTO THE ACTIVE PORTION OF THE FACILITY (e.g., TELEVISION MONITORING OR SURVEILLANCE BY			NA

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	3-1	GUARDS OR FACILITY PERSONNEL); OR BARRIER AND MEANS TO CONTROL ENTRY BARRIER §264.14(b)(2)(i) AN ARTIFICIAL OR NATURAL BARRIER THAT COMPLETELY SURROUNDS THE ACTIVE PORTION OF THE FACILITY; HEIGHT OF FENCE MATERIAL OF CONSTRUCTION AND MEANS TO CONTROL ENTRY §264.14(b)(2)(ii) A MEANS TO CONTROL ENTRY, AT ALL TIMES, THROUGH THE GATES OR OTHER ENTRANCES TO THE ACTIVE PORTION OF THE FACILITY (e.g., AN ATTENDANT, TELEVISION MONITORS, LOCKED ENTRANCE, OR CONTROLLED ROADWAY ACCESS TO THE FACILITY.)	✓ ✓ ✓ ✓		✓ 6 feet chain link electric gate locked enterance
	3-1	WARNING SIGNS §264.14(c) THE FACILITY MUST HAVE A SIGN WITH THE LEGEND "DANGER- UNAUTHORIZED PERSONNEL KEEP OUT", WHICH MUST BE POSTED AT EACH ENTRANCE TO THE ACTIVE PORTION OF THE FACILITY AND AT OTHER LOCATIONS, IN SUFFICIENT NUMBERS TO BE SEEN FROM ANY APPROACH TO THIS ACTIVE PORTION. THE LEGEND MUST BE LEGIBLE FROM A DISTANCE OF AT LEAST 25 FT. EXISTING SIGNS WITH A LEGEND OTHER THAN "DANGER- UNAUTHORIZED PERSONNEL KEEP OUT" MAY BE USED IF THE LEGEND ON THE SIGN INDICATES THAT ONLY AUTHORIZED PERSONNEL ARE ALLOWED TO ENTER THE ACTIVE	✓		warning signs are present - at specific locations

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	3-1	PORTION AND THAT ENTRY ONTO THE WAIVER ACTIVE PORTION CAN BE DANGEROUS.			
	N/A	IF A WAIVER OF THESE REQUIREMENTS IS REQUESTED, THE OWNER OR OPERATOR MUST DEMONSTRATE THE FOLLOWING: INJURY TO INTRUDER §264.14(a)(1) PHYSICAL CONTACT WITH THE WASTE, STRUCTURE, OR EQUIPMENT WITHIN THE ACTIVE PORTION OF THE FACILITY WILL NOT INJURE UNKNOWNING OR UNAUTHORIZED PERSONS OR LIVESTOCK THAT MAY ENTER THE ACTIVE PORTION OF A FACILITY AND VIOLATION CAUSED BY INTRUDER §264.14(a)(2) DISTURBANCE OF THE WASTE OR EQUIPMENT BY THE UNKNOWING OR UNAUTHKORIZED ENTRY OF PERSONS OR LIVESTOCK ONTO THE ACTIVE PORTION OF A FACILITY WILL NOT CAUSE A VIOLATION OF THE REQUIRMENTS OF §264.			N/A 
	Chpt. 6	b) CONTINGENCY PLAN §§264 SUBPART D AND 270.14(b)(7) A COPY OF THE CONTINGENCY PLAN OR SPILL PREVENTION CONTROL AND COUNTER MEASURES (SPCC) PLAN AMENDED FOR HAZARDOUS WASTE MANAGEMENT TO DESCRIBE THE ACTIONS FACILITY PERSONNEL WILL TAKE IN RESPONSE TO FIRES, EXPLOSIONS, OR ANY UNPLANNED SUDDEN OR NONSUDDEN RELEASE OF HAZARDOUS WASTE OR HAZARDOUS WASTE			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	6-2	CONSTITUENTS TO AIR, SOIL, SURFACE WATER, OR GROUND WATER AT THE FACILITY.			
	Chpt. 6	GENERAL INFORMATION §§264.52 AND .53 FACILITY NAME AND LOCATION OWNER OR OPERATOR NAME SITE PLAN DESCRIPTION OF FACILITY OPERATIONS	✓	✓ ✓ ✓	Location of equipment and evacuation route plans on site plans
	6-2	EMERGENCY COORDINATORS §§264.52(d) AND .55 NAMES, ADDRESSES, OFFICE AND HOME PHONE NUMBERS, AND DUTIES OF PRIMARY AND ALTERNATE COORDINATES A STATEMENT AUTHORIZING DESIGNATED COORDINATORS TO COMMIT THE NECESARY RESOURCES TO IMPLEMENT THE CONTINGENCY PLAN	✓ ✓		needs revision to reflect resignation of P. Manat Pag figure 6-2
	6-2 6-3	IMPLEMENTATION §§264.52(a) & 264.56(d) CRITERIA FOR IMPLEMENTATION OF CONTINGENCY PLAN FOR ANY POTENTIAL EMERGENCY.	✓		
	6-2 6-3	EMERGENCY RESPONSE PROCEDURES §§264.56(a)&(d) NOTIFICATION METHODOLOGY FOR IMMEDIATE NOTIFICATION OF FACILITY PERSONNEL AND NECESSARY STATE OR LOCAL AGENCIES.			fire alarm, public address system, voice
	6-2 6-3	IDENTIFICATION OF HAZARDOUS MATERIALS §264.56(b) AVAILABLE DATA AND/ OR PROCEDURES FOR IDENTIFICATION OF HAZARDOUS MATERIALS INVOLVED IN THE EMERGENCY AND QUANTITY AND AREAL EXTENT OF RELEASE. INCLUDE INFORMATION ON: BIOLOGICAL, PHYSICAL, AND		✓	The application says the EC will make this estimate by does not indicate what information will be available and how it will be used.

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	6-2 6-3	CHEMICAL PROPERTIES OF THE WASTE EXACT SOURCE AMOUNT AREAL EXTENT OF RELEASE			
	6-2 6-3	HAZARD ASSESSMENT §264.56(c) &(d) PROCEDURE FOR ASSESSMENT OF POSSIBLE HAZARDS TO THE ENVIRONMENT AND HUMAN HEALTH PROCEDURE FOR DETERMINING THE NEED FOR EVACUATION AND NOTIFICATION OF AUTHORITIES.		✓	The application says the E.C. will do this but does not describe the decision process
	6-3	CONTROL PROCEDURES §264.52(a) SPECIFIC RESPONSES AND CONTROL PROCEDURES TO BE TAKEN IN THE EVENT OF A FIRE, EXPLOSION, OR RELEASE OF HAZARDOUS WASTE TO AIR, LAND, OR WATER, INCLUDING PROCEDURES FOR RAPIDLY STOPPING WASTE FEED.	✓		Contained in Section 6.5 through 6.7 6.5 - releases 6.6 - fires 6.7 - explosions
	6-3 6-8 6-9 6-10 6-11 6-12	PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES § 264.56(e) DURING AN EMERGENCY SITUATION, A DESCRIPTION OF THE NECESSARY STEPS TO BE TAKEN TO ENSURE THAT FIRES, EXPLOSIONS, OR RELEASES DO NOT OCCUR, RECUR, OR SPREAD TO OTHER HAZARDOUS WASTE AT THE FACILITY. STEPS SHOULD INCLUDE: SHUT-DOWN OF PROCESSES AND		✓	The plan appears to minimize the disussion of valve closure during emergencies.

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	6-3 6-4 6-6	CONTINUED MONITORING OF THEM COLLECTING, CONTAINING AND TREATING RELEASED WASTED REMOVING AND ISOLATING CONTAINERS AND PROPER USE OF FIRE CONTROL STRUCTURES (e.g.FIRE DOORS),SYSTEMS(e.g. SPRINKLER SYSTEMS), AND EQUIPMENT (e.g. EXTINGUISHERS)			
	6-4	STORAGE AND TREATMENT OF RELEASED MATERIAL §264.56(g) PROVISION FOR TREATMENT, STORAGE, OR DISPOSAL OF ANY HAZARDOUS WASTE RESULTING FROM A RELEASE, FIRE, OR EXPLOSION AT THE FACILITY EQUIPMENT AVAILABLE AND LOCATION PROCEDURES FOR DEPLOYMENT OF THESE RESOURCES METHODS TO CONTAIN,TREAT, AND CLEAN UP A HAZARDOUS RELEASE AND DECONTAMINATE THE AFFECTED AREA	/ / / /		
	6-4	INCOMPATIBLE WASTE §264.56(h)(1) PROVISIONS FOR PREVENTION OF INCOMPATIBLE WASTE FROM BEING TREATED, STORED, OR LOCATED THE AFFECTED AREAS UNTIL CLEANUP PROCEDURES ARE COMPLETED.			N/A ↓

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	6-4 6-5	POST-EMERGENCY EQUIPMENT MAINTENANCE §§264.56(h)(2) and (i) PROCEDURES FOR ENSURING THAT ALL EMERGENCY EQUIPMENT LISTED IN THE CONTINGENCY PLAN IS CLEANED AND FIT FOR ITS INTENDED USE BEFORE OPERATIONS ARE RESUMED.	✓		
	N/A	SURFACE IMPOUNDMENTS SPILLS AND LEAKAGE			NA
	6-5	EMERGENCY EQUIPMENT §264.52(e) LOCATION, DESCRIPTION, AND CAPABILITIES OF EMERGENCY EQUIPMENT. THIS SHOULD INCLUDE: SPILL CONTROL EQUIPMENT FIRE CONTROL EQUIPMENT PERSONNEL PROTECTIVE ITEMS SUCH AS RESPIRATORS AND PROTECTIVE CLOTHING FIRST AID AND MEDICAL SUPPLIES EMERGENCY DECONTAMINATION EQUIPMENT EMERGENCY COMMUNICATION AND ALARM SYSTEMS	✓ ✓ ✓ ✓ ✓ ✓		
	6-5	COORDINATION AGREEMENTS §§264.37 & .52(c) A DESCRIPTION OF COORDINATION AGREEMENTS WITH LOCAL POLICE AND FIRE DEPARTMENTS, HOSPITALS, CONTRACTORS, AND STATE AND LOCAL EMERGENCY RESPONSE TEAMS TO FAMILIARIZE THEM WITH THE FACILITY AND ACTIONS NEEDED IN CASE OF EMERGENCY. A STATEMENT INDICATING THAT A COPY OF THE CONTINGENCY PLAN HAS BEEN	✓	✓	blank copies of letters are included in the application. no completed documents are included.

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	6-5	SUBMITTED TO THESE ORGANIZATIONS IF APPLICABLE, DOCUMENTATION OF REFUSAL TO ENTER INTO A COORDINATION AGREEMENT			
	6-7	EVACUATION PLAN §264.52(f) THIS PLAN MUST INCLUDE: CRITERIA FOR EVACUTION A DESCRIPTION OF SIGNAL (S) TO BE USED TO BEGIN EVACUATION WITH PRIMARY AND ALTERNATE EVACUATION ROUTES, RALLY POINTS	✓	✓	plan says fire alarms will be used. specific signals are not given.
	6-5	REQUIRED REPORTS §264.56(u) PROVISIONS FOR SUBMISSION OF REPORTS OF EMERGENCY INCIDENTS WITHIN 15 DAYS OF OCCURANCE NOTATION OF SUCH INCIDENTS IN THE OPERATING RECORD IDENTIFYING THE TIME, DATE, AND DETAILS OF THESE EMERGENCY INCIDENTS	✓ ✓		
	7-1 7-2	C) DESCRIPTION OF PROCEDURES, STRUCTURES, OR EQUIPMENT §270.14(b)(8) A DESCRIPTION OF PROCEDURES, STRUCTURES OR EQUIPMENT USED AT THE FACILITY FOR THE FOLLOWING: PREVENTION OF HAZARDS IN UNLOADING OPERATIONS (e.g. USE OF RAMPS OR SPECIAL FORKLIFTS) PREVENTION OF RUNOFF FROM HAZARDOUS WASTE HANDLING AREAS TO OTHER AREAS OF THE FACILITY OR ENVIRONMENT, OR PREVENTION OF FLOODING (e.g., BERMS, DIKES, TRENCHES) PREVENTION OF CONTAMINATION OF	✓ ✓ — ✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	7-3 7-3	WATER SUPPLIES MITIGATION OF EFFECTS OF EQUIPMENT FAILURE AND POWER OUTAGES PREVENTION OF UNDUE EXPOSURE OF PERSONNEL TO HAZARDOUS WASTE (e.g., PROTECTIVE CLOTHING)	— ✓		Question on systems that are closed during processing
	7-3 7-4	PRECAUTIONS TO PREVENT OR IGNITION OR REACTION OF IGNITABLE FOR REACTIVE WASTE §264.17(a) A DESCRIPTION OF THE PRECAUTIONS TAKEN BY A FACILITY THAT HANDLES IGNITABLE, REACTIVE WASTE TO PREVENT ACTUAL IGNITION, INCLUDING SEPARATION FROM SOURCES OF IGNITION SUCH AS OPEN FLAMES SMOKING, FRICTIONAL HEAT, SPARKS (STATIC, ELECTRICAL OR MECHANICAL), SPONTANEOUS IGNITION (e.g., HEAT PRODUCING CHEMICAL REACTIONS), AND RADIANT HEAT. DEMONSTRATION THAT WHEN IGNITABLE OR REACTIVE WASTE IS BEING HANDLED, THE OWNER OR OPERATOR CONFINES SMOKING AND OPEN FLAMES TO SPECIALLY DESIGNATED LOCATIONS LOCATIONS. "NO SMOKING" SIGNS MUST BE CONSPICUOUSLY PLACED WHEREVER A HAZARD EXISTS FROM IGNITABLE OR REACTIVE WASTE.	✓		
	N/A	GENERAL PRECAUTIONS FOR HANDLING IGNITABLE OR REACTIVE WASTE AND MIXING OF INCOMPATIBLE WASTE §264.17(b) A DESCRIPTION OF THE PRECAUTIONS TAKEN BY A FACILITY THAT TREATS, STORES, OR DISPOSES OF IGNITABLE OR REACTIVE WASTE AND OTHER MATERIALS,			NA ↓

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	N/A	TO PREVENT REACTIONS WHICH: (1) GENERATE EXTREME HEAT OR PRESSURE, FIRE OR EXPLOSIONS OR VIOLENT REACTIONS; (2) PRODUCE UNCONTROLLED FLAMMABLE FUMES, DUSTS, OR GASES IN SUFFICIENT QUANTITIES TO THREATEN HUMAN HEALTH OR THE ENVIRONMENT; (3) PRODUCE UNCONTROLLED FLAMMABLE FUMES OR GASES IN SUFFICIENT QUANTITIES TO POSE A RISK OF FIRE OR EXPLOSIONS; (4) DAMAGE THE STRUCTURAL INTEGRITY OF THE DEVICE OR FACILITY; OR (5) BY SIMILAR MEANS THREATEN HUMAN HEALTH OR THE ENVIRONMENT.			N A
	Chpt. 5	D) PREPAREDNESS AND PREVENTION PROCEDURES EQUIPMENT REQUIREMENTS §§264.32 & 270.14(b)(6) DEMONSTRATE THAT NONE OF THE HAZARDS POSED BY WASTE HANDLED AT THE FACILITY COULD REQUIRE A PARTICULAR KIND OF EQUIPMENT SPECIFIED BELOW. OR THE FACILITY MUST HAVE THE FOLLOWING EQUIPMENT:			
	5-1	INTERNAL COMMUNICATIONS §264.32(a) AN INTERNAL COMMUNICATION OR ALARM SYSTEM CAPABLE OF PROVIDING IMMEDIATE EMERGENCY INSTRUCTION TO FACILITY PERSONNEL.	✓		fire alarm & public address system
	5-1	EXTERNAL COMMUNICATIONS §264.32(b)	✓		telephone

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	5-1	A DEVICE SUCH AS A TELEPHONE OR A HANDHELD TWO-WAY RADIO, FOR SUMMONING EMERGENCY ASSISTANCE FROM LOCAL POLICE DEPARTMENT OR STATE OR LOCAL EMERGENCY RESPONSE TEAMS.	✓		telephone
	5-1 5-2	EMERGENCY EQUIPMENT §264.32(c) FIRE CONTROL EQUIPMENT (INCLUDING) SPECIAL EXTINGUISHING EQUIPMENT, SUCH AS THAT USING FOAM, INERT GAS, OR DRY CHEMICALS AND PORTABLE FIRE EXTINGUISHERS SPILL CONTROL EQUIPMENT DECONTAMINATION EQUIPMENT	✓ ✓ ✓		
	5-2	WATER FOR FIRE CONTROL §264.32(d) WATER AT ADEQUATE VOLUME AND PRESSUE TO SUPPLY WATER HOSE STREAMS, OR FOAM-PRODUCING EQUIPMENT, OR AUTOMATIC SPRINKLERS OR WATER SPRAY SYSTEMS	✓ ✓		Does the LESB fire system have backup power? Does the system supplement or replace the air port water?
	5-2	AISLE SPACE REQUIREMENT §264.35 ADEQUATE AISLE SPACE AVAILABLE OR DEMONSTRATION THAT AISLE SPACE IS NOT NEEDED TO ALLOW THE UNOBSTRUCTED MOVEMENT OF PERSONNEL, FIRE PROTECTION EQUIPMENT, OR SPILL CONTROL EQUIPMENT TO ANY AREA OF FACILITY OPERATION IN AN EMERGENCY.	✓		NA ↓
	8-1 8-2	E) PERSONNEL TRAINING §§264.16 & 270.14(b)(12) AN OUTLINE OF BOTH THE INTRODUCTORY AND CONTINUING TRAINING PROGRAMS BY OWNERS			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	8-1 8-2	AND OPERATORS TO PREPARE THE PERSONNEL TO OPERATE AND MAINTAIN THE FACILITY IN A SAFE MANNER. INCLUDE A BRIEF DECRIPTION OF HOW TRAINING WILL BE DESIGNED TO MEET ACTUAL JOB TASKS. (NOTE: ON-THE-JOB TRAINING MAY BE USED TO COMPLY WITH THESE REQUIREMENTS.)	✓		
	Chpt. 8 Attach 1	JOB TITLES AND DUTIES §§264.16(d)(1) & (2) FOR EACH EMPLOYEE WHOSE POSITION AT THE FACILITY IS RELATED TO HAZARDOUS WASTE MANAGEMENT INCLUDE: NAME JOB TITLE JOB DUTIES JOB DESCRIPTION	✓ — ✓	✓	
	8-1 8-2 8-3	TRAINING CONTENT, FREQUENCY, AND TECHNIQUES §§264.16(d)(3) & (c) IN BOTH INTRODUCTORY AND CONTINUING TRAINING (INCLUDING AN ANNUAL REVIEW OF THE INITIAL TRAINING) FOR EACH EMPLOYEE DESCRIBE: TRAINING CONTENT FREQUENCY OF TRAINING TECHNIQUE(S) USED IN TRAINING	✓ ✓	✓	
	8-2	TRAINING DIRECTOR §264.16(a)(2) DEMONSTRATION THAT THE PROGRAM IS DIRECTED BY A PERSON TRAINED IN HAZARDOUS WASTE MANAGEMENT. CREDENTIALS OF TRAINING DIRECTOR	✓	✓	
	8-1	RELEVANCE OF TRAINING TO JOB POSITION §264.16(a)(2) A BRIEF DESCRIPTION OF HOW INSTRUCTION OF FACILITY PERSONNEL IN HAZARDOUS WASTE MANAGEMENT PROCEDURES (INCLUDING	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	8-1	CONTINGENCY PLAN IMPLETATION) IS RELEVANT TO THEIR POSITIONS.			
	8-1 8-2 8-3	TRAINING FOR EMERGENCY RESPONSE §264.16(a)(3) DOCUMENTATION THAT THE TRAINING PROGRAM TRAINS FACILITY PERSONNEL TO RESPOND EFFECTIVELY TO EMERGENCIES AND TRAINS THEM TO BE FAMILIAR WITH EMERGENCY PROCEDURES, AND EMERGENCY EQUIPMENT, AND EMERGENCY SYSTEMS, INCLUDE WHERE APPLICABLE: PROCEDURES FOR USING, INSPECTING, REPAIRING, AND REPLACING FACILITY EMERGENCY AND MONITORING EQUIPMENT KEY PARAMETERS FOR AUTOMATIC WASTE FEED CUTOFF SYSTEMS SOME KEY PARAMETERS INCLUDE: - TYPE OF VALVE (e.g.,DIAPHRAGM, SOLENOID, OR FUSIBLE ELEMENT) AND HOW IT BASICALLY OPERATES - WHETHER THE VALVE FAILS IN AN OPEN OR CLOSED POSITION - WHETHER THE VALVE IS PNEUMATICALLY, HYDRAULICALLY, ELECTRICALLY, OR IN THE CASE OF FUSIBLE ELEMENT, HEAT ACTIVATED - WHETHER OR NOT THERE IS A MANUAL OVERRIDE IN CASE OF VALVE FAILURE AND HOW TO MANUALLY OPERATE THE VALVE - CONDITIONS WHICH ACTIVATE WASTE FEED CUT-OFF	✓		
	8-1 8-2	COMMUMICATIONS OR ALARM SYSTEM	✓		
	8-1 8-2	RESPONSE TO FIRES	✓		
	8-1 8-2	RESPONSE TO GROUNDWATER CONTAMINATION INCIDENTS	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	8-1 8-2	SHUTDOWN OF OPERATIONS			
	8-1	IMPLEMENTATION OF TRAINING PROGRAM §§264.16(d)(4) & 264.16(b) - INDICATION THAT TRAINING HAS BEEN AND WILL BE SUCCESSFULLY COMPLETED BY FACILITY PERSONNEL WITHIN SIX MONTHS OF THEIR EMPLOYMENT OR ASSIGNMENT TO A FACILITY, OR TRANSFER TO A NEW POSITION AT AT FACILTIY, WHICHEVER IS LATER. (NOTE: EMPLOYEES HIRED AFTER THE EFFECTIVE DATE OF THESE REGULATIONS MUST NOT WORK IN UNSUPERVISED POSITIONS UNTIL THEY HAVE COMPLETED THE TRAINING REQUIREMENTS).	✓		
	8-3	- RECORDS DOCUMENTING THAT THE REQUIRED TRAINING HAS BEEN GIVEN TO AND COMPLETED BY FACILITY PERSONNEL MUST BE MAINTAINED	✓		
	Chpt. 2	5 CHEMICAL AND PHYSICAL ANALYSIS §§264.13(a)& 270.14(b)(3) FOR EACH HAZARDOUS WASTE TREATED, STORED OR DISPOSED AT THE FACILITY, THE FOLLOWING INFORMATION SHOULD BE PROVIDED: - GENERAL SOURCE AND DESCRIPTION OF THE WASTE - HAZARDOUS CHARACTERISTICS - BASIS FOR HAZARD DESIGNATION - LABORATORY DATA ON ANALYSES RESULTS - EXISTING PUBLISHED OR DOCUMENTED DATA ON HAZARDOUS WASTE OR HAZARDOUS WASTE FROM A SIMILAR PROCESS AT A MINIMUM, THE ANALYSES SHOULD INCLUDE ALL THE INFORMATION WHICH MUST BE KNOWN TO TREAT, STORE OR DISPOSE OF THE WASTE IN ACCORDANCE WITH THE REGULATORY REQUIREMENTS.	✓		The waste analysis plan describes how the facility will obtain the referenced information from the generators.

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	Chpt. 2	6 WASTE ANALYSIS PLAN §§270.14(b)(2) & 264.13 THE WASTE ANALYSIS PLAN SHOULD DESCRIBE THE PROCEDURES USED TO OBTAIN CHEMICAL AND PHYSICAL INFORMATION AND DATA ON THE WASTES TO INSURE PROPER STORAGE, TREATMENT AND DISPOSAL.		✓	
	2-3 2-4 2-5	- PARAMETERS AND RATIONALE §264.13 A LIST OF PARAMETERS CHOSEN FOR ANALYSIS AND AN EXPLANATION OF THE RATIONALE FOR THEIR SELECTION.	✓		
	2-3 2-4 2-5	- TEST METHODS §264.13 A DESCRIPTION OF THE TEST METHODS USED TO TEST FOR PARAMETERS CHOSEN (EPA OR EQUIVALENT METHOD).	✓		
	2-6 2-7 2-8	- SAMPLING METHODS §264.13 & 261 APPENDIX I A LIST OF THE SAMPLING METHODS USED TO OBTAIN A REPRESENTATIVE SAMPLE OF EACH WASTE TO BE ANALYZED (EPA OR EQUIVALENT METHOD).	✓		
	2-1	- FREQUENCY OF ANALYSIS §264.13(b)(4) A DESCRIPTION OF THE FREQUENCY AT WHICH THE ANALYSES WILL BE REPEATED. FOR AN ON-SITE FACILITY THIS WILL BE WHENEVER THERE IS A PROCESS CHANGE OR AS OFTEN AS REQUIRED TO VERIFY CONSISTENCY OF THE WASTE LOAD.	✓		
	2-1	- ADDITIONAL REQUIREMENTS FOR WASTES GENERATED OFF-SITE §§264.13(b)(5) & 264.13(c) A DESCRIPTION OF THE PROCEDURES USE TO			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	2-1 2-2	INSPECT AND/OR ANALYZE WASTES GENERATED OFFSITE THAT INCLUDES PROCEDURES TO DETERMINE THEIR IDENTITY AND SAMPLING METHODS USED. ALSO INFORMATION SUPPLIED BY THE GENERATOR.		✓	
	2-1	- ADDITIONAL REQUIREMENTS FOR FACILITIES HANDLING IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES §§264.13(b)(6) & 264.17 IF THE FACILITY STORES OR TREATS IGNITIBLE, OR INCOMPATIBLE WASTE, A DESCRIPTION OF METHODS WHICH WILL BE USED TO MEET THE ADDITIONAL WASTE ANALYSIS REQUIREMENTS NECESSARY FOR COMPLYING WITH THE REGULATORY REQUIREMENTS FOR THESE TYPES OF HAZARDOUS WASTE.			.
	Chpt. 16	7 MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING §264.12; 264.71; §264.72; 264.73; - REQUIRED NOTICES §264.74; 264.75; - MANIFEST SYSTEM §264.76; 264.77; - OPERATING RECORDS - RECORDS RETENTION - ANNUAL REPORTS - UNMANIFESTED WASTE REPORTS - WASTE MINIMIZATION - ADDITIONAL REPORTS	✓ ✓ ✓ ✓ ✓ ✓ ✓	✓	264.12 - page 16-4 ✓ 264.72 - page 16-2 264.71 16-1 264.73 - page 16-3 location of waste 264.74 - page 16-c 264.75 - 16-2 .76 - 16-2 .77 - 16-2

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REF. NO	PAGE	17-30.401(2) Part II (B) - CONTAINERS §270.15	COMP.	INCOMP.	COMMENTS
	N/A	1 (a) Containers Without Free Liquids Test for Free Liquids §264.175(c) For areas that store containers of wastes that do not contain free liquids, the test procedures and results or other documentation or information showing that the wastes do not contain free liquids. Container Storage Area Drainage §264.175(c) The storage area must be sloped or otherwise designed to drain and remove liquid resulting from precipitation - Design drawing showing location of hazardous waste storage area - Description of stacking practices - Base slope - Drainage design and removal system including calculations - containers protection from liquid			
	11-1 11-2 11-3	1 (b) Containers With Free Liquids §264.175(b) Secondary Containment System Design and Operation			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	11-1 11-2 11-3	A description of the design and operation of the container storage area containment systems, including calculations, showing:			
		- Design drawing of containment system		✓	schematic only, no dimensions
		- Capacity of system to hold spills, leaks, precipitation		✓	calculations provided, no drawings with dimensions
		- Dimensions		✓	
		- Location of storage areas	✓		
		- Liquid collection system and location of sump	✓		
		- Description of base grade and slope		✓	descriptive, no drawings with dimensions
		- Description of curbs, dikes, berms, ditches, and trenches		✓	"
	11-1 11-2 11-3	Requirement for the Base to Contain Liquids §264.175(b)(1) The base under the containers must be free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed. The applicant should address:			
		- Construction and characteristics of base materials	✓		
		- Engineering evaluation of base structural integrity		✓	no discussion of integrity of slab, the compatibility of waste to slab, or why the slab is impervable.
		- Compatibility of base or liner with types of wastes stored		✓	
	11-1 11-2 11-3	- Containment System Drainage §264.175(b)(2) The base must be sloped or the containment system must be otherwise	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	11-1 11-2 11-3 11-4	designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids. For this requirement the applicant should address where applicable: - Describe handling and stacking practice - Grading of base - Drainage design and removal system so that standing liquid does not remain on base after a leakage or precipitation event.	 ✓ ✓	 ✓	 procedures described, triple stack not justified
	11-2 11-3	- Containment System Capacity §264.175(b)(3) The containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Information (with calculations) that should be included to satisfy this requirement is: - Volume of largest container - Total volume of containers - Containment structure capacity - Capacity of run-off collection system - Geographic storm intensity/frequency data.	 ✓ ✓ ✓ ✓	 ✓	 Capacity of containment system calculated, dimensions are not shown on drawings
	11-3	- Control of Run-on §264.175(b)(4) Run-on into the containment system must be prevented, unless the collection system has sufficient excess capacity in addition to that required in the above paragraph to contain any run-on that might enter the system. The applicant should discuss structure used to control run-on such as:		✓	discussion of how the portion of the trench outside of the building is protected from rain or run on is not given

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	11-3	- Containment system auxiliary structures (curbs, dikes, etc.) - Engineering grading design - Collection and removal system design capacity with calculation - Potential run-on - Demonstration that system has adequate capacity to handle run-on from precipitation event in addition to 10% of the volume of containers or the largest container, whichever is greater.	✓ ✓	✓ ✓ ✓	drawings do not have dimensions outside of building
	11-3	- Removal of Liquids from Containment System §264.175(b)(5) Spilled or leaked waste and accumulated precipitation must be removed from the sump of collection area in a timely manner to prevent overflow of the containment system. Information that should be included when describing removal of accumulated liquids is: - How liquids will be analyzed - Removal equipment and methods (sump pump design, piping specifications, location, discharge point and capacity) - Management of accumulated liquid including prevention of overflow.	✓ ✓ ✓		
	11-2	2 - Ignitable or Reactive Wastes in Containers §264.176 Sketches, drawing, or data demonstrating that containers of ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line.		✓	statements that containers are more than 50 feet from property boundary, but dimensions are not shown on the drawings
	N/A	Incompatible Wastes in Containers §264.177			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	N/A	- The procedures used to ensure that incompatible wastes and material are not placed in the same container (unless 264.17(b) is complied with) or in an unwashed container that previously held incompatible waste. - Dikes, berms, walls, or other devices used to separate incompatible wastes in containers.	✓		applicant states that incompatable waste are not managed at the facility. NO
	7-3 7-4	3 General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste 264.177(a)&(b) A description of the precautions taken by a facility that treats, stores, or disposes of ignitable or reactive waste, or accidentally mixes incompatible waste or incompatible wastes and other materials, to prevent reactions which: (1) generate extreme heat or pressure, fire or explosions or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; (5) by similar means threaten human health or the environment.	✓		
	11-1 11-2	4 Description of Containers §§264.171 & 264.172 A description of the facility's primary containment devices that includes basic design parameters, dimension, material of construction, and compatibility of waste with containers. Information submitted should include:			

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	11-1 11-2	- Type of container(s) and construction material - Dimensions and usable volume - Liner specifications - Condition of containers - Manufacturer specifications - Determination of compatibility of wastes and containers with description of how compatibility is determined such as trial mixing of waste in containers.	✓	✓ ✓ ✓	material of construction of containers is not provided not addressed 11-4 DOT specifications
	11-4	Container Management Practices §264.173 A description of container management practices: - Waste containers are always kept closed during storage, except when adding or removing waste. - Containers must not be stored in a manner that may cause them to rupture or leak. - Adequately separated for inspection - Aisle space - Maximum number, height, volume, and types of containers in storage area - Locations of ignitable, reactive, or incompatible wastes - Machinery, equipment and procedures used to move containers.	✓ ✓ ✓ ✓ ✓ ✓ ✓		
	11-4 Chpt. 4	5 Inspection Schedule §§264.15 & 264.174 General Inspection Requirements A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment: - Monitoring equipment - Emergency and safety equipment	✓		Figure 4.3. weekly

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	11-4 Chpt. 4	- Security devices - Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.	✓ ✓		Figure 4.5 - monthly Figure 4.2 - floor trench
	11-4 Chpt. 4	Types of Problems §264.15(b)(3) The schedule must identify the types of problems to look for during the inspection (e.g., leaks, deterioration, readings out of specified range, missing items or materials, inoperative equipment, etc.).	✓		
	11-4 Chpt. 4	Frequency of Inspection §264.15(b)(4) A description of the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected at least weekly to verify proper operation. All system alarms must also be tested daily.	✓		
	11-4 Chpt. 4	Specific Process Inspection Requirements Container Inspection §264.174 A description of the weekly inspection of containers and container storage areas for	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	11-4 Chpt.4	leaks in containers or deterioration of the containment system.			
	11-4 Chpt. 4	Remedial Action §264.15(c) Procedures for taking remedial actions when inspections reveal problems. (These may alternately be described in the contingency plan.)		✓	Inspection ~~and~~ form and process description of container management practices discuss leaks and spills but does not talk about facility repair needs.
	11-4 Chpt. 4	Inspection Log §264.15(d) A description of the inspection log or summary including the following: - Dates and times of inspection - Name(s) of inspector(s) - Observations made - Date and nature of repairs or remedial actions.	✓ ✓ ✓ ✓		
	Chpt. 9	6 Closure §§264.178 & 264.112 * Closure Plans A copy of the written closure plan consistent with the following items: Closure Performance Standard §264.111 A description of how closure - Minimizes the need for post-closure maintenance - Minimizes releases of hazardous wastes, leachate, and contaminated rainfall to the			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	Chpt. 9	air, groundwater, surface water, and surrounding land.			
	Chpt. 9	Partial Closure and Final Closure Activities §264.112 If partial closure is anticipated, a description of how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure. Also, a description of how and when the facility will be finally closed.	-		not planned
	11-2	6 Maximum Waste Inventory §264.112(b)(3) A calculation of the maximum inventory of wastes that could be in storage and treatment at any time.	✓		139,975 gallons containers 72,000 gallons tanks 16,156 gallons roll off containers
	Chpt. 9	Inventory Disposal, Removal or Decontamination of Equipment §264.114 A description of how all facility equipment and structures will be decontaminated or disposed of when closure is completed. - Decontamination procedures - Criteria for determining contamination - List equipment - Disposal of contaminated soil - Decontamination of cleanup materials and residues - Demonstrate decontamination has been effective.	✓ ✓	✓	

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	Chpt. 9	Closure of Containers §264.178 A description of how at closure all hazardous waste residues will be removed from the containment system and how remaining containers, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed. The description should address the following: - Hazardous waste removal and disposal - Container decontamination and disposal - Site decontamination and disposal including linings, soil, and washes - Verification of decontamination - Maximum inventory			
	Chpt. 9	Schedule for Closure §264.112(b)(6) A schedule for final closure including: - Estimated expected year of closure - Closure schedule with total time to close, time for closure activities, and inspection schedule during closure.	✓ ✓		after 2045 page 9-2
	Chpt. 9	Time Allowed for Closure §264.113(a)&(b) A schedule for closure which shows - All hazardous wastes will be treated, removed off-site; or disposed of on-site within 90 days from receipt of final volume	✓		page 9-2

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	Chpt. 9	of waste - All closure activities will be completed within 180 days from receipt of final volume of waste.	✓		page 9-2
	Chpt. 1	Extensions for Closure Time §§264.113(a) and 264.113(b) A petition made to the Department for a schedule for closure which exceeds the 90 days for treatment, removal, or disposal of wastes and/or the 180 days for completion of closure activities made to the Department. One of the following must be demonstrated: - Closure activities require longer than 180 days. - Facility has capacity to receive additional wastes - A person other than owner or operator will begin operation of the site - Closure would be incompatible with continued operation. Demonstrate that all steps have and will be taken to prevent threats to human health and environment from unclosed but inactive facility.			

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REF. NO	PAGE	17-30.401(2) Part II C – Tanks §270.16	COMP.	INCOMP.	COMMENTS
	12-1 & Attach 1	1. Structural Integrity §§264.191 & 264.192 a) Description of Tanks A review of tank design specifications and engineering calculations to assure that the tanks will not collapse or rupture. The specifications and calculations to be reviewed include shell strength, capacity, pressure controls, foundations structural support, and seams sufficient to demonstrate that tank will not collapse or rupture. Specifically, the applicant should address such items as:			T-101 to T-110 10 tanks R-202 to R-203 2 T-112 and T-114 2 (14 tanks)
		- Types and number of tanks	✓		
		- Tank wall thickness	✓		page 12-3
		- Tank internal pressure and pressure controls	✓		
		- Foundation construction, specifications, and structural supports		✓	
		- Tank design specifications including dimensions, capacity, design, shell thickness, material and method of construction			T-101 to T-110 - Page 12-3 R-202 and R-203 Page 12-3 T-112 and T-114 Page 12-4
		- Tank design standard code and year	✓		UL-142
		- Specifications on seams		✓	
		- Operating pressure and temperature	✓		
		- Type of waste contained in tanks	✓		
		- Specific gravity of tank liquids	✓		
		- Maximum height of liquid level	✓		
	Attach 1	b) Hazardous characteristic of the waste			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		Tank construction compatibility with waste and test or documentation to substantiate compatibility.	✓		
	Attach 1	c) Tank Corrosion and Erosion §264.192(a) A review of the pertinent characteristics of the tank construction material and lining materials to determine corrosion or erosion effects with wastes and other materials (i.e., treatment reagents). The applicant should also address: - Description of lining and coating materials - Corrosion allowance and corrosion and erosion rates. Demonstration of how minimum shell thickness will be maintained - Tank construction compatiblity with waste and tests or documentation to substantiate compatibility - Description of treatment reagents.	— —	— —	NONE MINIMAL WALL THICKNESS STATED. HOW IT WILL BE SPECIFICALLY MAINTAINED IS NOT GIVEN. NONE
	12-1	d) Age of the tanks			INSTALLED 1985 - T101 TO T110 AND R202; 204 T112; T114 INSTALL. 1989
	Attach 1	e) Tank integrity examination results			FOR TANKS T112 AND T114
	12-1, 2, 3 4 Figures 12-1, .2, .3	2. Dimensions and capacity of tanks §264.191 & 192 a) Dimennsions b) Capacity	✓ ✓		
	12-4 12-5 12-6	3. Tank Management Practices §264.192(b) A description of the tank owner's or operator's operating practices and controls: - Description of controls to prevent overfilling and overtopping such as waste feed cut-off system(s), by-pass or standby tank	✓		PRE TRANSFER INVENTORY BY OPERATOR. OPERATOR PRESENT DURING TRANSFER OPERATIONS

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		- Demonstration of maintenance of sufficient freeboard to prevent overtopping by wave or wind action or precipitation for uncovered tanks	✓		
	Figure 12.1 12.2 12.3	4. Diagram of Piping, Instrumentation, and Process Flows - Tank process flow and piping diagrams and specifications - Description of tank instrumentation such as pressure, temperature, pH level, gauges and monitors - Description of safety devices such as rupture discs and safety vents - Description of pollution control devices such as vapor recovery systems.		✓	Piping and instrumentation not provided
	N/A	5. Corrosion Protection §264.191(c)			
	Attach 1	6. Installed of Tank System §§264.192(b),(c),(d)& (e) §264.192(b) a) certification of proper handling procedures b) type of backfill material §264.192(c) c) tested for tightness §264.192(d) d) supporting and protectionof ancillary equipment §264.192(e)	- - ✓	✓ - ✓ ✓	installed in 1995 and 1988 (T111, T112, T114) NA
	12-6 12-7 12-8	7. Secondary Containment System a) meet requirement for secondary containment §264.193(a) b) 1. Design of system §264.193(b) 2. Detecting and collecting releases c) 1. Compatible with waste in the system §264.193)c) 2. Foundation 3. Leak-detection system	 ✓ ✓ ✓ ✓ ✓		visual daily inspections

Tanks T-111, T112 and T114 - are tanks used in the fuel blending process. these tanks were not addressed by FDEP as regulated until 1994. The preconstruction and installation reports were not prepared at the time of installation, and are therefore not available.

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	12-9 12-10	4. Remove of released waste or accumulated precipitation d) A degree for the secondary containment §264.193(d) e) Secondary containment systems requirement 1. External liner system §264.193(e) 2. Vault system 3. Double-walled tank 4. Variance requirement	✓		
	N/A	8. Variance Requirement § 264.193(g) a) Plans and engineering reports describing alternate design and operating practices. b) Hydrogeologic reports describing prevent of hazardous constituents into the groundwater or surface water c) Risk assessment			NA ↓
	12-1 to 12-10	9. Controls and Practices to Prevent Spills and Overflow §264.194(b) a) Check valves b) Level sensing devices c) High level alarms d) Automatic feed cutoff e) freeboard A description of operation procedures that ensures at least 60 cm (2 ft) of freeboard, unless the open tank is equipped with a containment structure, a drainage control system, or a diversion structure with a capacity that equals or exceeds the volume of the top 60 cm (2 ft) of the tank.	✓ ✓ ✓ —	— —	Level sensing devices High level alarms NA
	12-11	10. General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		§§264.198 and .199 A description of the precautions taken by a facility that treats, stores, or disposes of ignitable or reactive waste, or accidentally mixes incompatible waste or incompatible wastes and other materials, to prevent reactions which: (1) generate extreme heat or pressure, fire or explosions or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes, or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; (5) by similar means threaten human health or the environment.		—	The application says that LESB will comply with these requirements - it does not describe how the facility will comply with the requirements
	12-11	Ignitable or Reactive Wastes in Tanks A description of the operational procedures used for storing such wastes in tanks that includes specific information on: - How the waste is treated, rendered, or mixed before or immediately after placement in the tank so tthat it is no longer considered ignitable and complies with §264.17(b); or the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite; or the tank is used solely for emergencies. - How facilities that treat or store ignitable or reactive waste in covered in covered tanks comply with the National Fire Protection Association's code for tanks.		—	see above
	4-1	11. Inspection Schedule			

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	4-1 & Figure 4.1	§264.15 General Inspection Requirements §264.15(a)&(b) §264.33 A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment: - Monitoring equipment - Emergency and safety equipment - Security devices - Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.	✓ ✓ ✓ ✓	✓	Figure 4.1 figure 4.3 figure 4.5 figure 4.1
	4-1 & Figure 4.1	Types of Problems §264.15(b)(3) The schedule must identify the types of problems to look for during the inspection (e.g., leaks, deterioration, readings out of specified range, missing items or materials, inoperative equipment, etc.).	✓		
	4-1 & Figure 4.1	Frequency of Inspection §264.15(b)(4) A description of the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undected between inspections Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. All emergency waste feed cut-off valves must be inspected at least weekly to verify proper operation. All system alarms must also be tested daily.	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	4-1 & Figure 4.1	Specific Process Inspection Requirement §264.195 Tank Inspection - A description of the daily inspection of overfilling control equipment, monitoring equipment and level of waste in uncovered tanks - A description of the weekly inspection of tank construction materials and the area surrounding the tank - A schedule describing the daily monitoring of monitoring equipment (e.g., pressure and temperature gauges, shutoff valves, vents, piping, etc.) where present to ensure that the tank is operated according to design specifications - A schedule showing the level of waste in uncovered tanks is inspected daily - A schedule and procedure for assessing the condition of the tank - A procedure for emptying a tank to allow entry and inspection when necessary.	✓ ✓ ✓ ✓ ✓	✓	- level alarms, level gauge - figure 4.1 - read level? - figure 4.1 - - figu. 4.1 NA 12.2 annual ultrasonic thickness gauge
	4-2 & Figure 4.8	Remedial Action §264.15(c) §264.195 Procedures for taking remedial actions when inspections reveal problems. (These may alternately be described in the contingency plan.)			
	4-1 & Figure 4.1	Inspection Log §264.73(b)(5) §264.15(d) A description of the inspection log or summary including the following: - Dates and times of inspections	✓		

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		- Name(s) of inspector(s) - Observations made - Date and nature of repairs or remedial actions.	✓ ✓ ✓		
	Chpt. 9	12. Closure Closure Plans §122.25(a)(13) §264.112 A copy of the written closure plan consistent with the following items:			see review in Part II - K
	Chpt. 9	Closure Performance Standard §264.111 A description of how closure - Minimizes the need for post-closure maintenance - Minimizes releases of hazardous wastes, leachate, and contaminated rainfall to the air, groundwater, surface water, and surrounding land.			
	Chpt. 9	Partial Closure and Final Closure Activities §264.112(a)(1) If partial closure is anticipated, a description of how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure Also, a description of how and when the facility will be finally closed.			
	Chpt. 9	Maximum Waste Inventory §264.112(a)(2) A calculation of the maximum inventory of wastes that could be in storage and treatment at any time.			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	Chpt. 9	Inventory Disposal, Removal or Decontamination of Equipment §264.114 A description of how all facility equipment and structures will be decontaminated or disposed of when closure is completed. - Decontamination procedures - Criteria for determining contamination - List equipment - Disposal of contaminated soil - Decontamination of cleanup materials and residues - Demonstrate decontamination has been effective			
	Chpt. 9	Closure of Tanks §264.197 A description of how at closure all hazardous waste residues will be removed from tanks, discharge control equipment, and discharge confinement structure, and the facility will be decontaminated. The description should address the following: - Waste removal from tanks and equipment - Decontamination of all components - Verification of decontamination - Disposal of wastes and residues - Maximum inventory			
	Chpt. 9	Schedule for Closure §264.112(a)(4) A schedule for final closure including: - Estimated expected year of closure - Closure schedule with total time to close, time for closure activities and inspection schedule during closure.			

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	Chpt. 9	Time Allowed for Closure §264.113(a)&(b) A schedule for closure which shows - All hazardous wastes will be treated, removed off-site, or disposed of on-site within 90 days from receipt of final volume of waste - All closure activities will be completed within 180 days from receipt of final volume of waste.			
	Chpt. 9	Extensions for Closure Time §264.113(a) §264.113(b) A petition made to the Department for a schedule for closure which exceeds the 90 days for treatment, removal, or disposal of wastes and/or the the 180 days for completion of closure activities to the Department. One of the following must be demonstrated: - Closure activities require longer than 180 days - Facility has capacity to receive additional wastes - A person other than owner or operator will begin operation of the site - Closure would be incompatible with continued operation. Demonstrate that all steps have and will be taken to prevent threats to human health and environment from unclosed but inactive facility.			

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REF. NO	PAGE	17-30.401(2) Part II K Closure/Post-closure §270.14(b)(13)	COMP.	INCOMP.	COMMENTS
	Chpt. 10	1 Closure performance standard of §264.111 a. A description of how each hazardous waste management unit at the facility will be closed in accordance with §264.111.			
	10-1	b. A description of how final closure will be conducted in accordance with §264.111, including the maximum extent of the operations which will be not be closed during the active life of the facility.			
	10-1 10-2 10-3 10-4 10-5 10-6 10-7 10-8 10-9	c. An estimate of maximum inventory of wastes ever on site over the active life of the facility of the facility, and a detailed description of the methods to be used during partial and final closures, including, but not limited to: i. Procedures for cleaning equipment ii. Procedures for removing contaminated soils iii. Methods for sampling and testing surrounding soils iv. Criteria for determining the extent of decontamination required to satisfy the closure performanace standard		✓	139,975 gallons in containers 72,600 gallons in tanks 16,150 gallons in rolloffs - page 9-5 - page 9-8 & 9-9 - using only a grid is not acceptable - page 9-7
	10-8	e. A detailed description of additional activities necessary during the closure period to ensure that all partial closures and final closure satisfy the closure performance standards, including, but not limited to:			

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	10-8	i. Groundwater monitoring ii. Leachate collection iii. Run-on and run-off control			NA ↓
	10-2	f. Closure schedules for each hazardous waste unit and for final closure: i. Time required to close each unit ii. Time required for intervening closure		—	This section gives the total time to conduct closure, but does not give individual internal target dates. (page 9-2)
	10-2	g. An estimate of the expected year of final closure (for facilities that use trust funds to establish financial assurance under 264.43 or .145 and that are expected to close prior to the expiration of the permit)			page 9-2 2045
	N/A	2 A Post-closure plan (if required) in accordance with 264.118 and .197 which must contain the following information for each unit at the facility subject to the requirements of 264. This plan must include all information required by part II, sections A through I of this application [270.14(b)(14)]: a. The activities which will be carried on after closure for each disposal unit and the frequencies of these activities			NA ↓
	N/A	b. A description of the planned monitoring activities and frequencies at which they will be performed to comply with subparts F, J, K, L, M and N of Part 264 during the post-closure care period			↓
	N/A	c. A description of the planned maintenance activities, and frequencies at which they will be performed to ensure the integrity of the cap and final cover or other containment systems in accordance with the requirements of subparts J, K M and N of Part 264 and to ensure the function of the monitoring equipment in accordance with the requirements of subparts F, J, K, L, M and N			↓

REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	N/A	d. The name, address and phone number of the person or office to contact about the hazardous waste disposal unit or facility during post-closure care			NA
	Same Plan	3 If closure/post-closure plans have been approved by the Department as part of a previous permit application, attach a copy of the plan as required by 264.112 and 264.118, and either: a. Attach a certification that no changes have been made or b. provide an amended plan showing all changes or proposed changes.			

FACILITY LESB
I.D. NUMBER FLD 980 729 610
PATS NUMBER
TYPE OF APPLICATION
DATE
REVIEWER

SUBMITTALS	REF. NO	DATE	REVIEWER
	1		
	2		
	3		

REF. NO	PAGE	17-30.401(2) Part II P - Information Regarding Potential Releases From Solid Waste Management Units	COMP.	INCOMP.	COMMENTS
	1-6	1 - Facility Name	✓		
	1-6	2 - EPA ID Number	✓		
	1-6	3 - City	✓		
	1-6	4 - State	✓		
	1-6	5 - Did they check if they have solid waste management units.	✓		
	1-7	6 - Is there a description of the solid waste management units with data on quantities or volumes, and dates.		✓	description of quantities or volumes not included other units (trash containers, etc) not indicated.
	1-7	7 - Is there any data for prior or current releases of hazardous waste or constituents a) Date of release b) Type of waste release c) Quantity or volume of waste released d) Describe nature of release	✓		no prior release not reported NA
	1-8	8 - Is there a description of the analytical data which describe the nature and extent of environmental contamination			NA
	1-8	9 - Signature of Certification	✓		

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