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REF. NO	PAGE	17-30.401(2) Part II (B) - CONTAINERS §270.15	COMP.	INCOMP.	COMMENTS
N/A		<p>1 <u>(a) Containers Without Free Liquids</u></p> <p><u>Test for Free Liquids §264.175(c)</u></p> <p>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.</p> <p><u>Container Storage Area Drainage §264.175(c)</u></p> <p>The storage area must be sloped or otherwise designed to drain and remove liquid resulting from precipitation</p> <ul style="list-style-type: none"><li>✓ Design drawing showing location of hazardous waste storage area</li><li>✓ Description of stacking practices</li><li>✓ Base slope</li><li>✓ Drainage design and removal system including calculations</li><li>- containers protection from liquid</li></ul>			
N/A		<p>1 <u>(b) Containers With Free Liquids §264.175(b)</u></p> <p><u>Secondary Containment System Design and Operation</u></p>			

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	7-3  11-3 to 11-7  11-1	<p>A description of the design and operation of the container storage area containment systems, including calculations, showing:</p> <ul style="list-style-type: none"> <li>- Design drawing of containment system</li> <li>- Capacity of system to hold spills, leaks, precipitation</li> <li>- Dimensions</li> <li>- Location of storage areas</li> <li>- Liquid collection system and location of sump</li> <li>- Description of base grade and slope</li> <li>- Description of curbs, dikes, berms, ditches, and trenches</li> </ul>		✓	<p>Storage capacity is 2,952 - 55 gal containers. What is their current capacity now? How much</p> <p>11-1 states it will not allow a potentially explosive vapor build-up in the bldg. in case of a spill. How can he say that with a building closed on 3 sides. (</p>
	11-1	<p><u>Requirement for the Base to Contain Liquids</u> §264.175(b)(1)</p> <p>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:</p> <ul style="list-style-type: none"> <li>- Construction and characteristics of base materials</li> <li>- Engineering evaluation of base structural integrity</li> <li>- Compatibility of base or liner with types of wastes stored</li> </ul>		✓	<p>Does not appear they provided an engineering evaluation of the structural integrity. Check out what type of sealant was used. Check out awning and its ability to barricade rain.</p>
		<p>- <u>Containment System Drainage</u> §264.175(b)(2)</p> <p>The base must be sloped or the containment system must be otherwise</p>	OK		

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	7-1 to 7-3	<p>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:</p> <ul style="list-style-type: none"> <li>- Describe handling and stacking practice</li> <li>- Grading of base</li> <li>- Drainage design and removal system so that standing liquid does not remain on base after a leakage or precipitation event.</li> </ul>	OK		
	11-3, 11-7, 11-4  11-5 & 11-6	<p>- <u>Containment System Capacity</u> §264.175(b)(3)</p> <p>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:</p> <ul style="list-style-type: none"> <li>- Volume of largest container</li> <li>- Total volume of containers</li> <li>- Containment structure capacity</li> <li>- Capacity of run-off collection system</li> <li>- Geographic storm intensity/frequency data.</li> </ul>		✓	What about railcar storage? Is there any? If so, is there secondary containment.
	14-3	<p>- <u>Control of Run-on</u> §264.175(b)(4)</p> <p>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:</p>	OK		

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		<ul style="list-style-type: none"> <li>- Containment system auxiliary structures (curbs, dikes, etc.)</li> <li>- Engineering grading design</li> <li>- Collection and removal system design capacity with calculation</li> <li>- Potential run-on</li> <li>- 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.</li> </ul>	OK		
	11-3, 11-7 7-1, 7-2	<ul style="list-style-type: none"> <li>- <u>Removal of Liquids from Containment System</u>                §264.175(b)(5)                Spilled or leaked waste and accumulated precipitation must be removed from the sump of collection area in a timely manner to prevent overflow of the containment system. Information that should be included when describing removal of accumulated liquids is:             </li> <li>- How liquids will be analyzed</li> <li>- Removal equipment and methods (sump pump design, piping specifications, location, discharge point and capacity)</li> <li>- Management of accumulated liquid including prevention of overflow.</li> </ul>	OK		
	7-2	2 - <u>Ignitable or Reactive Wastes in Containers</u> §264.176 Sketches, drawing, or data demonstrating that containers of ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line.		✓	A-2, Land surveyors map indicates containers are only with 48' 8"
		<u>Incompatible Wastes in Containers</u> §264.177			

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	11-8, 11-9, 11-10 to 11-43  11-7	<ul style="list-style-type: none"> <li>- 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.</li> <li>- Dikes, berms, walls, or other devices used to separate incompatible wastes in containers.</li> </ul>			
	7-4 to 7-5	<p>3 <u>General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste</u> 264.177(a)&amp;(b)</p> <p>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:</p> <p>(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.</p>	OK		
		<p>4 <u>Description of Containers</u> §§264.171 &amp; 264.172</p> <p>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:</p>	OK		

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		<ul style="list-style-type: none"> <li>- Type of container(s) and construction material</li> <li>- Dimensions and usable volume</li> <li>- Liner specifications</li> <li>- Condition of containers</li> <li>- Manufacturer specifications</li> <li>- Determination of compatibility of wastes and containers with description of how compatibility is determined such as trial mixing of waste in containers.</li> </ul>			
		<p><u>Container Management Practices</u>            §264.173</p> <p>A description of container management practices:</p> <ul style="list-style-type: none"> <li>- Waste containers are always kept closed during storage, except when adding or removing waste.</li> <li>- Containers must not be stored in a manner that may cause them to rupture or leak.</li> <li>- Adequately separated for inspection</li> <li>- Aisle space</li> <li>- Maximum number, height, volume, and types of containers in storage area</li> <li>- Locations of ignitable, reactive, or incompatible wastes</li> <li>- Machinery, equipment and procedures used to move containers.</li> </ul>			
		<p>5 <u>Inspection Schedule</u>                    §§264.15 &amp; 264.174</p> <p><u>General Inspection Requirements</u></p> <p>A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment:</p> <ul style="list-style-type: none"> <li>- Monitoring equipment</li> <li>- Emergency and safety equipment</li> </ul>			

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		<ul style="list-style-type: none"> <li>- Security devices</li> <li>- Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.</li> </ul>			
		<u>Types of Problems</u> §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.).			
		<u>Frequency of Inspection</u> §264.15(b)(4)  A description of the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected at least weekly to verify proper operation. All system alarms must also be tested daily.			
		<u>Specific Process Inspection Requirements</u>  <u>Container Inspection</u> §264.174  A description of the <u>weekly</u> inspection of containers and container storage areas for			

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		leaks in containers or deterioration of the containment system.			
		<u>Remedial Action</u> §264.15(c)  Procedures for taking remedial actions when inspections reveal problems. (These may alternately be described in the contingency plan.)			
		<u>Inspection Log</u> §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.			
		6 <u>Closure</u> §§264.178 & 264.112  * <u>Closure Plans</u>  A copy of the written closure plan consistent with the following items:  <u>Closure Performance Standard</u> §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			



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		air, groundwater, surface water, and surrounding land.			
		<u>Partial Closure and Final Closure Activities</u> §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.			
		6 <u>Maximum Waste Inventory</u> §264.112(b)(3)  A calculation of the maximum inventory of wastes that could be in storage and treatment at any time.			
		<u>Inventory Disposal, Removal or Decontamination of Equipment</u> §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.			

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		<p><u>Closure of Containers</u> §264.178</p> <p>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:</p> <ul style="list-style-type: none"> <li>- Hazardous waste removal and disposal</li> <li>- Container decontamination and disposal</li> <li>- Site decontamination and disposal including linings, soil, and washes</li> <li>- Verification of decontamination</li> <li>- Maximum inventory</li> </ul>			
		<p><u>Schedule for Closure</u> §264.112(b)(6)</p> <p>A schedule for final closure including:</p> <ul style="list-style-type: none"> <li>- Estimated expected year of closure</li> <li>- Closure schedule with total time to close, time for closure activities, and inspection schedule during closure.</li> </ul>			
		<p><u>Time Allowed for Closure</u> §264.113(a)&amp;(b)</p> <p>A schedule for closure which shows</p> <ul style="list-style-type: none"> <li>- All hazardous wastes will be treated, removed off-site; or disposed of on-site within 90 days from receipt of final volume</li> </ul>			

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		of waste - All closure activities will be completed within 180 days from receipt of final volume of waste.			
		<u>Extensions for Closure Time</u> §§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
		<p>1. <u>Structural Integrity</u> §§264.191 &amp; 264.192</p> <p>a) <u>Description of Tanks</u></p> <p>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:</p> <ul style="list-style-type: none"><li>- Types and number of tanks</li><li>- Tank wall thickness</li><li>- Tank internal pressure and pressure controls</li><li>- Foundation construction, specifications, and structural supports</li><li>- Tank design specifications including dimensions, capacity, design, shell thickness, material and method of construction</li><li>- Tank design standard code and year</li><li>- Specifications on seams</li><li>- Operating pressure and temperature</li><li>- Type of waste contained in tanks</li><li>- Specific gravity of tank liquids</li><li>- Maximum height of liquid level</li></ul>			<p>✓ 1. Relief pressure setting - 1.002/in<sup>2</sup>, perhaps too low. What about design operating pressure. Compare w/ pressure release. Is this acceptable to UL-142 specs.?</p> <p>2. Vertical vessel data sheet for tank system too blurry. (Blurry for T-111)</p> <p>3. T-111 designed for orig. pressure. Why? If the stuff has VOC's, he may want to keep the gases in the tank.</p> <p>4. I-11 makes reference to vessels R-203. Jacket design pressure not stated for tank R-203.</p> <p>[Comments cont'd. on attached page]</p>
		b) <u>Hazardous characteristic of the waste</u>		✓	Should be completed.

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		Tank construction compatibility with waste and test or documentation to substantiate compatibility.		✓	12-1 makes reference to a PE assessment certifying compatibility w/ the wastes. Would like to see it.
	7-4 to 7-5	<p>c) <u>Tank Corrosion and Erosion</u> §264.192(a)</p> <p>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:</p> <ul style="list-style-type: none"> <li>- Description of lining and coating materials</li> <li>- Corrosion allowance and corrosion and erosion rates. Demonstration of how minimum shell thickness will be maintained</li> <li>- Tank construction compatibility with waste and tests or documentation to substantiate compatibility</li> <li>- Description of treatment reagents.</li> </ul>		✓	Did not describe treatment reagents in 7-4 or 7-5
	G-2	d) Age of the tanks	✓ok		
	12-11 to 12-3	e) Tank integrity examination results		✓	Need to check out tank integrity assessment.
	I-10 to I-37	<p>2. <u>Dimensions and capacity of tanks</u> §264.191 &amp; 192</p> <p>a) Dimensions</p> <p>b) Capacity</p>	ok		
	?	<p>3. <u>Tank Management Practices</u> §264.192(b)</p> <p>A description of the tank owner's or operator's operating practices and controls:</p> <ul style="list-style-type: none"> <li>- Description of controls to prevent overfilling and overtopping such as waste feed cut-off system(s), by-pass or standby tank</li> </ul>		✓	This portion should be applicable.

Chap. 12 contains no data for T-111, 112, & 114

T-151 to T-156

- ✓ 1. No wall thickness -
- ✓ 2. Max. Pressure 6 psig. Relief valve setting not specified.
- ✓ 3. Material of construction not stated. I-13 states supplier will complete.
4. Tank standard API 650. No year.
5. Did not indicate specifications on seams. No seams standards (Maybe ANSI B31.1) Check out
6. I-14 states Vent is an FLG TYPE, Size 6. What is this?
7. What is CS\*. Need to demonstrate how  $\frac{1}{8}$ " corrosion allowance will be maintained.

T-211 to T-214 // R202 - R203

1. Wall Thickness not given. 7. No corrosion allowance indicated. Need to demonstrate how corrosion allowance can be maintained
2. Tank Construction Standard is 304 S.S., Describe this. No year.
3. Sheet 1 of 5 states relief valve is set at 7 in H<sub>2</sub>O, but tank schematic shows no relief valve.
4. Did not indicate specifications on seams.
5. West Tank Farm indicates presence of R202/R203. R-202/R203 not described in I-49
6. R202 & R203 do not have specification sheets like T-211 to T-214 As a result:
  - a. No pressure setting on relief valve. Tank treated w/steam.
  - b. Need max. ht. of liquid level.
  - c. Need s.g. of liquid. Describe type of waste stored.
  - d. No specifications on seams.
  - e. No tank design code. No year
  - f. No shell thickness. Why no lining?
  - g. Max. oper. pressure is 20 in Hg vacuum?
  - h. No design pressure, What's \* for?

T-801 to T-803, Acid Waste/Chromium Waste.

1. No design pressure/working pressure data.
2. Doesn't appear to be any pressure controls.
3. Did not state what tank standards this needs to comply with. No year.
4. I-24 indicates tanks will have a scrubber and vent, Air Permit? Need details about scrubber.
5. Did not see many specifications on the seams.
6. Need to see PE assessment on acid tanks and deck on compatibility.
7. No allowable ht. vs. actual ht. of liquid level.
8. No corrosion allowance indicated. Also need to demonstrate corrosion allowance can be maintained.

#### T-811 to T-813

- a. No working pressure vs. design pressure info.
- b. No wall thickness
- c. There appears to be a vent and scrubber. Air permit? Need scrubber info.
- d. Tank Standard API-650, No year.
- e. What do they mean by CS-\*. See I-27.
- f. Need to see PE tank assessment addressing waste compatibility w/tank.
- g. Need to demonstrate how shell thickness can be maintained. Need corrosion rate.

#### T-851 to T-852 Neutralization Reactor

- a. I-30 indicates working volume is greater than total volume.
- b. No wall thickness - CS\*?
- c. No working pressure vs. design pressure info.
- d. There appears to be vent (separate) and scrubber. Air permit? Need scrubber info.

What are the expected gaseous pollutants?

- e. Tank standard - API-650, No year.
- f. What do they mean by CS\*?
- g. No maximum ht vs. design height info.?
- h. Need to see PE tank assessment about waste compatibility w/tank.

#### T-870 to T-873

- a. After the belt presses. How will they meet POTW standards? What are the POTW standards?
- b. Filter press sump P-876 appears to be another tank.

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	N/A	- Demonstration of maintenance of sufficient free-board to prevent overtopping by wave or wind action or precipitation for uncovered tanks				
	App. K 12-16 12-2	<u>4. Diagram of Piping, Instrumentation, and Process Flows</u>  - 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.		✓  ✓ ✓ ✓	DWG PFF-090 shows Laminar flow booth and inclined tray have exhaust units. Are they permitted by air? DWG PFF-010 appears to show a filter press sump & drip tray which could be considered additional tanks. 95-01-1400 shows vacuum pump exits have vents. (2 vents) - p-16 only talked about procedures to prevent overfilling. What about pit control? Does not appear consistent w/ App. I. Some have scrubbers. Others pressure relief valves. No details on scrubbers for inorganic system.	
		<u>5. Corrosion Protection</u> §264.191(c)		✓	Should have been responded to.	
	12-1 to 12-3	<u>6. Installed of Tank System</u> §§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 protection of ancillary equipment §264.192(e)	OK			
	12-3 to 12-16	<u>7. Secondary Containment System</u>  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	OK			



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	12-3 to 12-16	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	OK		
	N/A	8. <u>Variance Requirement</u> § 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			
	12-3 to 12-5  12-16 to 12-17	9. <u>Controls and Practices to Prevent Spills and Overflow</u> §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.		✓	12-3 to 12-5 did not talk about maintaining sufficient free board on open tanks like the sump and drip tray pg. K-4. 12-16 states a high level alarm will be used. Audible or Lights?
		10. <u>General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste</u>			

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	12-18	<p>§§264.198 and .199</p> <p>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.</p>		✓	<p>7-4 states emissions will be vented through scrubbers. Schematic drawing just states /scrubber.</p> <p>7-4 states each tank is vented. No pressure relief valves.</p>
	12-18  7-4/0 7-5	<p><u>Ignitable or Reactive Wastes in Tanks</u></p> <p>A description of the operational procedures used for storing such wastes in tanks that includes specific information on:</p> <ul style="list-style-type: none"> <li>- How the waste is treated, rendered, or mixed before or immediately after placement in the tank so that it is no longer considered ignitable and complies with §264.17(b); or the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite; or the tank is used solely for emergencies.</li> <li>- 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.</li> </ul>	OK		
		11. <u>Inspection Schedule</u>			

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	6-1 6-2  6-3 6-8 6-9 6-10 6-11	<p style="text-align: right;">§264.15</p> <p><u>General Inspection Requirements</u> §264.15(a)&amp;(b) §264.33</p> <p>A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment:</p> <ul style="list-style-type: none"> <li>- Monitoring equipment</li> <li>- Emergency and safety equipment</li> <li>- Security devices</li> <li>- Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.</li> </ul>	OK		<p>Check out daily inspection checklist at the plant.</p> <p>Check daily inspection checklist for how they complete odor/dumes blank</p> <p>No inspection checklist pertaining to pressure relief valves and scrubbers.</p>
	See Above	<p><u>Types of Problems</u> §264.15(b)(3)</p> <p>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.).</p>		✓	Checklists do not appear to identify types of problems for scrubbers
	See Above	<p><u>Frequency of Inspection</u> §264.15(b)(4)</p> <p>A description of the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. All emergency waste feed cut-off valves must be inspected at least weekly to verify proper operation. All system alarms must also be tested daily.</p>	✓		

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		<u>Specific Process Inspection Requirement</u>  <div style="text-align: right;">§ 264.195</div> <u>Tank Inspection</u> <ul style="list-style-type: none"> <li>- A description of the daily inspection of overfilling control equipment, monitoring equipment and level of waste in uncovered tanks</li> <li>- A description of the <u>weekly</u> inspection of tank construction materials and the area surrounding the tank</li> <li>- A schedule describing the <u>daily</u> 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</li> <li>- A schedule showing the level of waste in uncovered tanks is inspected <u>daily</u></li> <li>- A schedule and procedure for assessing the condition of the tank</li> <li>- A procedure for emptying a tank to allow entry and inspection when necessary.</li> </ul>	OK	<div>✓</div> <div>✓</div> <div>✓</div>	<p>There appears to be 2 uncovered tanks; the drip tank under the belt presses and the sump pump. 6-1 does not have provisions to inspect these.</p> <p>I don't see a provision for daily check on tank vents.</p> <p>I don't <sup>see</sup> a schedule check on the belt press drip pan and the sump pump.</p>	
9-5 to 9-6	6-12	<u>Remedial Action</u> <div style="text-align: right;">§ 264.15(c) § 264.195</div> Procedures for taking remedial actions when inspections reveal problems. (These may alternately be described in the contingency plan.)	OK	✓	9.2.5 states spills from overhead piping is highly unlikely because there are no valves, joints, etc.. Need to demonstrate the tightness of the piping itself.	
6-1 to 6-12		<u>Inspection Log</u> <div style="text-align: right;">§ 264.73(b)(5) § 264.15(d)</div> A description of the inspection log or summary including the following: <ul style="list-style-type: none"> <li>- Dates and times of inspections</li> </ul>	OK			

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		<ul style="list-style-type: none"> <li>- Name(s) of inspector(s)</li> <li>- Observations made</li> <li>- Date and nature of repairs or remedial actions.</li> </ul>			
	Chap. 13.	<p>12. <u>Closure</u></p> <p><u>Closure Plans</u> §122.25(a)(13) §264.112</p> <p>A copy of the written closure plan consistent with the following items:</p>	OK		
		<p><u>Closure Performance Standard</u> §264.111</p> <p>A description of how closure</p> <ul style="list-style-type: none"> <li>- Minimizes the need for post-closure maintenance</li> <li>- Minimizes releases of hazardous wastes, leachate, and contaminated rainfall to the air, groundwater, surface water, and surrounding land.</li> </ul>	OK		
		<p><u>Partial Closure and Final Closure Activities</u> §264.112(a)(1)</p> <p>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.</p>	OK		
		<p><u>Maximum Waste Inventory</u> §264.112(a)(2)</p> <p>A calculation of the maximum inventory of wastes that could be in storage and treatment at any time.</p>			

FACILITY _____		FEDERAL I.D. NO. _____	PATS NO. _____		PAGE 9 OF 10
REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		<u>Inventory Disposal, Removal or Decontamination of Equipment</u> §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	OK		
		<u>Closure of Tanks</u> §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	OK		
		<u>Schedule for Closure</u> §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.	OK		

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		<u>Time Allowed for Closure</u> §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.	OK		
		<u>Extensions for Closure Time</u> §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.	OK		

FACILITY _____ I.D. NUMBER _____ PATS NUMBER _____ TYPE OF APPLICATION _____ DATE _____ REVIEWER _____	SUBMITTALS	REF. NO	DATE	REVIEWER
		1		
		2		
		3		

REF. NO	PAGE	17-30.401(2) Part II - A - GENERAL §270.14	COMP.	INCOMP.	COMMENTS
	C-3 C-3 B-4 B-4 3-1,3-2 P/A A-3 C-3 A-3 A-2 A-2 A-3 P/A	1 A. TOPOGRAPHIC 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		✓	A-3 does not show Loading/unloading area. A-2 does not show drainage or flood control. A-2 does not show runoff control system.  A-3 does not show Location of past, present, and future TSD areas,
	H-2	B. WIND POSE WIND SPEED DIRECTION LEGEND DATE	OK		
	7-5	C. TRAFFIC PATTERNS §270.14(b)(10) VOLUME PATTERN CONTROL ACCESS ROADS LOAD - BEARING CAPACITY ROAD SURFACES	OK		



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	App. L.	<p>2 FINANCIAL RESPONSIBILITY INFORMATION</p> <p>CALL TALLAHASSEE TO GET INFORMATION ON COMPLETENESS OF FINANCIAL.</p>		✓	They need to get a letter from Tallahassee accepting their financial responsibility information.
	<p>B-1 to B-4</p> <p>N/A</p> <p>N/A</p>	<p>3 FLOOD MAP §270.14(b)(11)</p> <p>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:</p> <ul style="list-style-type: none"> <li>° 100-YR FLOODPLAIN LEVEL</li> <li>° OTHER SPECIAL FLOODING FACTORS (E.G., WAVE ACTION) THAT MUST BE CONSIDERED TO PREVENT WASHOUT.</li> </ul> <p><u>DEMONSTRATION OF COMPLIANCE</u></p> <p>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:</p> <p><u>FLOOD PROOFING AND FLOOD PROTECTION</u></p> <p>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:</p>		✓	TRSI should distinguish between Zone A and Zone C

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REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	N/A	<ul style="list-style-type: none"> <li>◦ ENGINEERING ANALYSIS OF HYDRODYNAMIC AND HYDROSTATIC FORCES</li> <li>◦ STRUCTURAL OR OTHER ENGINEERING STUDIES OF HAZARDOUS WASTE UNITS AND FLOOD PROTECTION DEVICES.</li> </ul>			
	N/A	<p><u>FLOOD PLAIN</u></p> <p>DESCRIPTION OF THE PROCEDURES TO BE FOLLOWED TO REMOVE HAZARDOUS WASTE TO SAFETY BEFORE THE FACILITY IS FLOODED. THE PLAN MUST ADDRESS THE FOLLOWING:</p> <ul style="list-style-type: none"> <li>◦ TIMING RELATED TO FLOOD LEVELS</li> <li>◦ ESTIMATED TIME TO MOVE THE WASTE</li> <li>◦ DESCRIPTION OF THE LOCATION TO WHICH THE WASTE WILL BE MOVED AND PROOF OF THE RECEIVING FACILITY'S ELIGIBILITY TO RECEIVE HAZARDOUS WASTE</li> <li>◦ PROCEDURES, EQUIPMENT, AND PERSONNEL TO BE USED AND THE MEANS TO ENSURE THAT THESE RESOURCES WILL BE AVAILABLE</li> <li>◦ POTENTIAL FOR ACCIDENTAL DISCHARGE OF THE WASTE.</li> </ul>			
	3-1	<p>4 FACILITY SECURITY INFORMATION</p> <p>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:</p>			
	3-1	<p>24-HOUR SURVEILLANCE SYSTEM §264.14(b)(1)</p> <p>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</p>			Verify by inspection.

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	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		✓	Verify by inspection.
	3-1	AND		✓	Verify by inspection.
	3-2	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.)			
	3-1 to 3-3	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		✓	Verify by inspection.

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		PORTION AND THAT ENTRY ONTO THE WAIVER ACTIVE PORTION CAN BE DANGEROUS.			
	N/A	<p>IF A WAIVER OF THESE REQUIREMENTS IS REQUESTED, THE OWNER OR OPERATOR MUST DEMONSTRATE THE FOLLOWING:</p> <p>INJURY TO INTRUDER §264.14(a)(1)            PHYSICAL CONTACT WITH THE WASTE, STRUCTURE, OR EQUIPMENT WITHIN THE ACTIVE PORTION OF THE FACILITY WILL NOT INJURE UNKNOWING OR UNAUTHORIZED PERSONS OR LIVESTOCK THAT MAY ENTER THE ACTIVE PORTION OF A FACILITY AND VIOLATION CAUSED BY INTRUDER §264.14(a)(2)            DISTURBANCE OF THE WASTE OR EQUIPMENT BY THE UNKNOWING OR UNAUTHKORIZED ENTRY OF PERSONS OR LIVESTOCK ONTO THE ACTIVE PORTION OF A FACILITY WILL NOT CAUSE A VIOLATION OF THE REQUIRMENTS OF §264.</p>			
9-1 to 9-22		<p>b) CONTINGENCY PLAN §§264 SUBPART D AND 270.14(b)(7)</p> <p>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</p>			<p>a. Include <sup>District</sup> FDER emergency response coordinator in list.</p> <p>b. Addresses emptying of tanks (drums to tanks). What about gaseous releases resulting from the comingling of wastes.</p> <p>c. Releases from tanks. What about gaseous releases from tanks. Only talks about releases from overfilling. What about gaseous releases from high pressures? Some tanks must be steam treated.</p> <p>d. How about notifying the public of significant spill releases? Probably will stink downwind. Public notification in case of fire (see 9.4)</p> <p>e. How about identifying all excessive pressure release points?</p> <p>f. 9-10 shows building has fire foam suppression system. Check out level of protection.</p>

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		CONSTITUENTS TO AIR, SOIL, SURFACE WATER, OR GROUND WATER AT THE FACILITY.			
	G-2  1-1 to 1-51	GENERAL INFORMATION §§264.52 AND .53 FACILITY NAME AND LOCATION OWNER OR OPERATOR NAME SITE PLAN DESCRIPTION OF FACILITY OPERATIONS	OK		
	9-15 to 9-16	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 NECESSARY RESOURCES TO IMPLEMENT THE CONTINGENCY PLAN		✓	Include Julie Gross in the list.
	9-1	IMPLEMENTATION §§264.52(a) & 264.56(d) CRITERIA FOR IMPLEMENTATION OF CONTINGENCY PLAN FOR ANY POTENTIAL EMERGENCY.		✓	9.1 does not appear to say that contingency plan will be implemented when there is excessive pressure build-up in storage or process areas.
		EMERGENCY RESPONSE PROCEDURES §§264.56(a)&(d) NOTIFICATION METHODOLOGY FOR IMMEDIATE NOTIFICATION OF FACILITY PERSONNEL AND NECESSARY STATE OR LOCAL AGENCIES.		✓	How will the neighbors downwind be notified?
	9-19 to 9-20	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		✓	Sec. 9.8 Tank Repair states people will enter tank if O <sub>2</sub> content is 19.5. Should use bell levels. Verify presence of Chris Manual in Taylor's office. Sec. 9.10. MSDS sheets for raw materials? This is hazardous waste. How can they have

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	9-19 to 9-20	CHEMICAL PROPERTIES OF THE WASTE EXACT SOURCE AMOUNT AREAL EXTENT OF RELEASE	ok		
	9-19 to 9-20	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.			Emergency coordinator (9-10) states he will determine the volume of hazardous materials released. What volumes will trigger the Contingency Plan?
	9-1 to 9-12	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.			9.2.5 states leak is unlikely at the overhead piping area. Pls. demonstrate. 9.2.5 does not appear to address procedures for rapidly stopping waste feed.
	9-1 to 9-12	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		✓	Pls. specify. Cannot see it.

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	9-1 10 9-19	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)	OK			
	9-17  9-8	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	OK  OK			
		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.				

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		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.			
		SURFACE IMPOUNDMENTS SPILLS AND LEAKAGE			
		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			
		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			



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		SUBMITTED TO THESE ORGANIZATIONS IF APPLICABLE, DOCUMENTATION OF REFUSAL TO ENTER INTO A COORDINATION AGREEMENT			
		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			
		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			
		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			

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		WATER SUPPLIES MITIGATION OF EFFECTS OF EQUIPMENT FAILURE AND POWER OUTAGES PREVENTION OF UNDUE EXPOSURE OF PERSONNEL TO HAZARDOUS WASTE (e.g., PROTECTIVE CLOTHING)			
		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.			
		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,			

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		<p>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.</p>			
		<p>D) PREPAREDNESS AND PREVENTION PROCEDURES            EQUIPMENT REQUIREMENTS      §§264.32 &amp; 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:</p>			
		<p>INTERNAL COMMUNICATIONS    §264.32(a)            AN INTERNAL COMMUNICATION OR ALARM SYSTEM CAPABLE OF PROVIDING IMMEDIATE EMERGENCY INSTRUCTION TO FACILITY PERSONNEL.</p>			
		<p>EXTERNAL COMMUNICATIONS    §264.32(b)</p>			

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		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.				
		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				
		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				
		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.				
		E) PERSONNEL TRAINING §§264.16 & 270.14(b)(12)  AN OUTLINE OF BOTH THE INTRODUCTORY AND CONTINUING TRAINING PROGRAMS BY OWNERS				

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		AND OPERATORS TO PREPARE THE PERSONNEL TO OPERATE AND MAINTAIN THE FACILITY IN A SAFE MANNER. INCLUDE A BRIEF DESCRIPTION OF HOW TRAINING WILL BE DESIGNED TO MEET ACTUAL JOB TASKS. (NOTE: ON-THE-JOB TRAINING MAY BE USED TO COMPLY WITH THESE REQUIREMENTS.)			
		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			
		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			
		TRAINING DIRECTOR §264.16(a)(2) DEMONSTRATION THAT THE PROGRAM IS DIRECTED BY A PERSON TRAINED IN HAZARDOUS WASTE MANAGEMENT. CREDENTIALS OF TRAINING DIRECTOR			
		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			

FACILITY _____		FEDERAL I.D. NO. _____	PATS NO. _____		PAGE 15 OF 18
REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		CONTINGENCY PLAN IMPLETATION) IS RELEVANT TO THEIR POSITIONS.			
		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:  <u>PROCEDURES FOR USING, INSPECTING, REPAIRING, AND REPLACING FACILITY EMERGENCY AND MONITORING EQUIPMENT</u>  <u>KEY PARAMETERS FOR AUTOMATIC WASTE FEED CUTOFF SYSTEMS</u>  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			
		COMMUNICATIONS OR ALARM SYSTEM			
		RESPONSE TO FIRES			
		<u>RESPONSE TO GROUNDWATER CONTAMINATION INCIDENTS</u>			

FACILITY _____		FEDERAL I.D. NO. _____	PATS NO. _____		PAGE 16 OF 18
REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		SHUTDOWN OF OPERATIONS			
		<p><u>IMPLEMENTATION OF TRAINING PROGRAM</u>  §§264.16(d)(4) &amp; 264.16(b)</p> <p>- 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).</p> <p>- RECORDS DOCUMENTING THAT THE REQUIRED TRAINING HAS BEEN GIVEN TO AND COMPLETED BY FACILITY PERSONNEL MUST BE MAINTAINED</p>			
		<p>5 <u>CHEMICAL AND PHYSICAL ANALYSIS</u> §§264.13(a)&amp; 270.14(b)(3)</p> <p>FOR EACH HAZARDOUS WASTE TREATED, STORED OR DISPOSED AT THE FACILITY, THE FOLLOWING INFORMATION SHOULD BE PROVIDED:</p> <p>- 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</p> <p>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.</p>			

FACILITY _____		FEDERAL I.D. NO. _____		PATS NO. _____		PAGE 17 OF 18
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		<p>6 <u>WASTE ANALYSIS PLAN</u> §§270.14(b)(2) &amp; 264.13</p> <p>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.</p>		✓	4-3 talks about a coliwasa for containers w/ free flowing liquids - what is it?	
		<p>- <u>PARAMETERS AND RATIONALE</u> §264.13</p> <p>A LIST OF PARAMETERS CHOSEN FOR ANALYSIS AND AN EXPLANATION OF THE RATIONALE FOR THEIR SELECTION.</p>				
		<p>- <u>TEST METHODS</u> §264.13</p> <p>A DESCRIPTION OF THE TEST METHODS USED TO TEST FOR PARAMETERS CHOSEN (EPA OR EQUIVALENT METHOD).</p>				
		<p>- <u>SAMPLING METHODS</u> §264.13 &amp; 261 APPENDIX I</p> <p>A LIST OF THE SAMPLING METHODS USED TO OBTAIN A REPRESENTATIVE SAMPLE OF EACH WASTE TO BE ANALYZED (EPA OR EQUIVALENT METHOD).</p>			4-3 states tank trucks will be sampled from the top of each compartment in the truck. How about sampling the bottom? Res's sludge in the bottom.	
		<p>- <u>FREQUENCY OF ANALYSIS</u> §264.13(b)(4)</p> <p>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.</p>				
		<p>- <u>ADDITIONAL REQUIREMENTS FOR WASTES GENERATED OFF-SITE</u> §§264.13(b)(5) &amp; 264.13(c)</p> <p>A DESCRIPTION OF THE PROCEDURES USE TO</p>				



FACILITY _____		FEDERAL I.D. NO. _____	PATS NO. _____		PAGE 18 OF 18
REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		INSPECT AND/OR ANALYZE WASTES GENERATED OFFSITE THAT INCLUDES PROCEDURES TO DETERMINE THEIR IDENTITY AND SAMPLING METHODS USED. ALSO INFORMATION SUPPLIED BY THE GENERATOR.			
		<p>- <u>ADDITIONAL REQUIREMENTS FOR FACILITIES HANDLING IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES §§264.13(b)(6) &amp; 264.17</u></p> <p>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.</p>			
		<p>7 <u>MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING</u></p> <p>§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</p>			

FACILITY _____ I.D. NUMBER _____ PATS NUMBER _____ TYPE OF APPLICATION _____ DATE _____ REVIEWER _____		SUBMITTALS		REF. NO	DATE	REVIEWER
				1		
				2		
				3		

  

REF. NO	PAGE	17-30.401(2) Part II K Closure/Post-closure §270.14(b)(13)	COMP.	INCOMP.	COMMENTS
		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.			
		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.			
		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 performance standard			
		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:			

FACILITY _____		FEDERAL I.D. NO. _____	PATS NO. _____		PAGE 2 OF 3
REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		i. Groundwater monitoring ii. Leachate collection iii. Run-on and run-off control			
		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			
		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)			
		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			
		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			
		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			

FACILITY _____		FEDERAL I.D. NO. _____	PATS NO. _____		PAGE 3 OF 3
REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
		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			
		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 _____ I.D. NUMBER _____ PATS NUMBER _____ TYPE OF APPLICATION _____ DATE _____ REVIEWER _____			SUBMITTALS		REF. NO	DATE	REVIEWER
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REF. NO	PAGE	17-30.401(2) Part II 0 - Exposure Information	COMP.	INCOMP.	COMMENTS
		1. REASONABLY FORESEEABLE POTENTIAL RELEASES FROM BOTH NORMAL OPERATIONS AND ACCIDENTS AT THE UNIT, INCLUDING RELEASES ASSOCIATED WITH TRANSPORTATION TO OR FROM THE UNIT.			264.601(c) requires prevention of any release that may have adverse effects on human health and the environment. G-12 states some of the SWMU's are waste recycling operations. They also called the container storage building a SWMU. Also called 10 RCRA fuel handling tanks as SWMU's.
		2. THE POTENTIAL PATHWAYS OF HUMAN EXPOSURE TO HAZARDOUS WASTES OR CONSTITUENTS RESULTING FROM THE RELEASE DESCRIBED UNDER PARAGRAPH (1).			Item 3, G-13 states there are no releases from existing units. They
		3. THE POTENTIAL MAGNITUDE AND NATURE OF THE HUMAN EXPOSURE RESULTING FROM SUCH RELEASES.			

FACILITY _____ I.D. NUMBER _____ PATS NUMBER _____ TYPE OF APPLICATION _____ DATE _____ REVIEWER _____			SUBMITTALS		REF. NO	DATE	REVIEWER
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REF. NO	PAGE	17-30.401(2) Part II P - Information Regarding Potential Releases From Solid Waste Management Units	COMP.	INCOMP.	COMMENTS
		1 - Facility Name	OK		
		2 - EPA ID Number	OK		
		3 - City	OK		
		4 - State	OK		
		5 - Did they check if they have solid waste management units.	OK		Yes, they did. 1 - Container Storage Area 2 - 10 Fuel Blending Tanks 3 - Distillation Equipment (They should be more specific. See Attached)
		6 - Is there a description of the solid waste management units with data on quantities or volumes, and dates.		✓	No data on quantities and volumes handled by the SWMU's. (See attached for a list of possible RCRA SWMU's)
		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		✓	Application states there are no releases. There should be gaseous releases. That's what exhaust vents are for.
		8 - Is there a description of the analytical data which describe the nature and extent of environmental contamination		✓	None. There should be. Perhaps an ISCST or ISCLT model.
		9 - Signature of Certification	OK		

## Possible RCRA Units Which Were not Included in the Application

T-160	Sludge Mix Tank
T-111	Sludge Mix Tank
T-161	Fuels Blending Tank
T-112	Fuels Blending Tank
M-127	Laminar Flow Booth w/ Solidified Fuel Tray
M-121	Inclined Tray
M-122	Shredder Hopper
S-101	Vacuum Still with Vacuum Pump to Vent
H-201	Thin Film Evaporator w/ Vacuum Pump to Vent
F-302	Distillation Column w/ Vent [Somewhere between <sup>reflux</sup> receiver and <sup>product</sup> tanks.
Tank Truck Loading Operations (See K-3)	

## Sources of odor:

1. 1000 ACFM vent for T-111/T-112.
2. 4500 ACFM vent for shredder.
3. 11,000 ACFM vent for chopping pen.
4. U-860 scrubber for neutralization/precipitation (Proposed)
5. Vacuum pump (P-104) exhaust, snus vacuum still (S-101)
6. Vacuum pump (P-205) exhaust, snus thin film evaporator (H-201)
7. distillation column exhaust? See K-3
8. Solidified fuels dumping, with vent fan (C-132)
9. Exhaust fan for sludge mix tanks (C-130)
10. Exhaust fan for shredder (M-122) / inclined tray (M-121), - fan C-131



FACILITY <u>TRICIL RECOVERY SERVICES, INC.</u> I.D. NUMBER <u>FLD 980729610</u> PATS NUMBER <u>HC53-170970</u> TYPE OF APPLICATION <u>CONSTRUCTION</u> DATE <u>12/12/89</u> REVIEWER <u>SAN AGUSTIN</u>		SUBMITTALS		REF. NO	DATE	REVIEWER
				1		
				2		
				3		

  

REF. NO	PAGE	17-30.401(2) Part I §270.13	COMP.	INCOMP.	COMMENTS
	App.G. G-2	A. GENERAL INFORMATION	OK		
	G-2	A-1 TYPE OF FACILITY §270.13(a)			
	G-2	A-2 TYPE OF APPLICATION	OK		
	G-2	A-3 DATE OPERATION BEGAN §270.13(g)	OK		
	G-2	A-4 FACILITY NAME §270.13(b)	OK		
	G-2	A-5 EPA/DER I.D. NUMBER	OK		
	G-2	A-6 FACILITY LOCATION §270.13(b)	OK		
	G-2	A-7 FACILITY MAILING ADDRESS §270.13(b)	OK		
	G-2	A-8 FACILITY CONTACT NAME PHONE TITLE ADDRESS	OK		
	G-2	A-9 OPERATOR'S NAME §270.13(d)	OK		
	G-2	A-10 OPERATOR'S ADDRESS §270.13(d)	OK		

FACILITY _____		FEDERAL I.D. NO. _____	PATS NO. _____		PAGE 2 of 3
REF. NO	PAGE	17-30.401(2) Part I	COMP.	INCOMP.	COMMENTS
	G-2	A-11 FACILITY OWNER'S NAME §270.13(e)	OK		
	G-2	A-12 FACILITY OWNER'S ADDRESS §270.13(e)	OK		
	G-2	A-13 LEGAL STRUCTURE A-14 COUNTY-STATE REGISTRATION		✓	Need to fill in the blank.
	G-2	A-15 STATE OF INCORPORATION	OK		
	G-3	A-16 PARTNERSHIP OWNERS NAMES ADDRESS	NO ANSWER		
	G-3	A-17 SITE OWNERSHIP STATUS LAND OWNER'S LAND OWNER'S ADDRESS	OK		
	G-3	A-18 ENGINEER NAME REGISTRATION NUMBER ADDRESS ASSOCIATION	OK		
	G-3	A-19 INDIAN LAND §270.13(f)	OK		
	G-3	A-20 EXISTING ENVIRONMENTAL PERMITS §270.13(k)	OK		
	G-3	B. SITE INFORMATION	OK		
	G-3	B-1 FACILITY LOCATION COUNTY NEAREST COMMUNITY LATITUDE LONGITUDE	OK		

FACILITY _____		FEDERAL I.D. NO. _____	PATS NO. _____		PAGE 3 OF 3
REF. NO	PAGE		COMP.	INCOMP.	COMMENTS
	G-3	B-2 AREA OF FACILITY SITE	OK		
	7-6	B-3 SCALE DRAWING AND PHOTOGRAPHS §270.13(h)		✓	Did not estimate traffic pattern, volume and control. Did not distinguish between past, present, and future facilities.
	C-3 & G-3 B-2  C-2 A-2 N/A APP. J N/A	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	OK  OK  OK  OK  OK	✓    ✓	C-2 does not appear to show surrounding land uses.  12 wells
	B-2	B-5 FLOOD PLAIN		✓	should be called B-2, not B-4
	G-4	C. LAND USE INFORMATION  C-1 ZONING	OK		
	G-4	C-2 ZONING CHANGES	OK		
	G-4	C-3 PRESENT LAND	OK		
	G-4	D OPERATING INFORMATION  D-1 WASTE GENERATED ON SITE §270.13(c)	OK		Process area and Treatment area in Fig. 7.2 so we can see all the treatment processes.
	1-1 to 1-51	D-2 DESCRIPTION OF OPERATION §§270.13(i) and (m)		✓	§ (attached)
		D-3 PROCESS CODE §270.13(j) DESIGN CAPACITY AND UNITS EPA HAZARDOUS WASTE NUMBER ANNUAL QUANTITY AND UNITS		✓	Does not specify the specific processes as instructed. Rows G-5 through G-11 should specify the processes along with the hazardous wastes listed. <u>What's SO1, SO2, + TO1?</u> Pg. 11-7 Forklift will be able to lift drums w/out forklifts. How?

Pages 1-1 to 1-51

- 1) Pg. 1-33, Sec. 1.2.4 - Containers will be listed. How? Will be poured into mix tank. Odor source?
- 2) Pg. 1-38, Chart No. 4 - Could precipitation tank be a source of odor? How about installing odor control
- 3) Pg. 1-39, Filtration Process: Draining & Pressing - Odor?
- 4) Pg. 1-42, states fuel is blended to meet hazardous waste fuel specifications for BTU value and Chlorine content.
- 5) Pg. 1-43, Containers w/ too viscous materials are emptied into a shredder. Odor?
- 6) Pg. 1-43, DOT spec. accumulation container. (Sec. 1.4.3) will be used to handle magnetic waste.
- 7) Pg. 1-44, Fig 1.3 - Fuels blending process flow diagram not clear. Shows an exhaust fan with vent to the atmosphere.
- 8) Pg. 1-45, Determination of quantity and rate of addition of one waste stream to another. What if there's not enough of the acidic or alkaline waste. Maybe reagents are needed on stock to make up for the shortage. Talks about supplemental reagents in 1.5.2. Where are they stored.
- 9) Pg. 1-45, 1.5.2, reaction pH will be controlled until the batch meet POTW requirements for discharge of wastewater.
- 10) Pg. 1-45, 1.5.2, Will acid/alkaline neutralization reactions produce toxic gases? FFPI will be installing acid/gas scrubber. Why not TRSI.
- 11) Pg. 1-46, 1.5.3. Talks about sufficient quantity of containerized waste. What is sufficient?
- 12) Pg. 1-46, 1.6 - States sodium sulfide will be used,  $H_2S$  reacts violently & causes  $H_2S$  emissions. Could be fatal.
- 13) 1-7, Pg. 1-48 T-872 & T-873 are wastewater storage tanks. Where does the wastewater go?
14. Any safety devices on the proposed tanks? What about Cyanide wastes.

- i. Told us to look at API 650, Sec. 3. Section 3 is made up of many sections. Has a variety of specs. You must specify which one. Had to reference ANSI B16.5
- j. OK
- k. References API 650 again. Wrong. 534-6858
- l. ~~Tank~~ References API 650 again.
- m. Relief valve is shown on top view, but is not shown on side view.
- n. References API 650 again, Section 3.
- o. Wants me to look at UL142 — We have no copy.
- vi. did not ask questions about Linings.
- p. Wants me to look at UL142
- q. Acid Waste Tanks 801-803 — will operate at atm. pressure? Maybe there's something wrong with this.
- r. States FRP tank standards have been provided to DER. Haven't gotten it.
- s. Carbon bed scrubber for a Acid Tank? Doesn't sound right
- t. Tells me to see the FRP standards. Wrong! You see it forme!
- u. References API 650 standards again! Wrong!
- v. Tells me to see s. above. I-30 to I-33 doesn't say much.
- w. OK
- y. Then why don't you list them as not application. Why don't you just do it so we don't have to argue over this.
- z. References s. above again. Wrong!
- aa. Used latest revision again.
- bb. Prip tray & sump not a container, not a tank. Probably OK.
- cc. Call City of Bartow. Verify what was said

3. OK

4. Just use visual observation

(813) 883-0911 →

at 30

Doug Allen

1. OK

2. Table 12.1 should be revised to specify relief pressure setting on 3" vent.  
b. Requested for the <sup>UL-142</sup> specs. but this was not provided.  
g. Requested for tank internal pressure for the 3" valve to open. Was not provided.

a. a.b. (Check out vertical vessel data sheet). 264.31 requires prevention of unplanned releases. If we approve this, vapor emissions would be under planned and it would be OK.

Fuel blending operations are expected to increase since LES plans to double tank storage capacity and container storage capacity for organic wastes. Consequently, vapor releases are also expected to increase. As quantity and see if the increase in emissions will pose a threat to surrounding neighbors.

c. States standards are in UL-142 which has been provided to the Rpt. Our files indicate Tricil provided API 650. Whether API 650 is the same as UL142, DER expects you to answer that question.

DER has a problem with applicants who tell DER to look for the standards. We expect you to specify these standards for us, for purposes of facilitating <sup>our</sup> permit review.

Page I-34 states specs for T-117, 112, 114 & A-111 <sup>211, 212, 213, 214</sup> are not relevant ~~for~~ to the permit for HW storage. We would like to know why. We feel this is a RCRA regulated unit. It could be a tank, or ancillary equipment, or a Subpart X unit. Regardless which one, it will be regulated. We want you to agree to this in writing.

d. OK

e. OK

- f. ~~T-111, 112, &~~ States T-111, 112, & 114 ~~are~~ should not be part of this storage permit.  
g. Looked at API 650, Section 3. Looked at 3.6.3. Section is full of equations. ~~There's~~ Not only that there's 2 methods for calculating wall thickness. We expect you to specify a new thickness for us. During the meeting, Matt Lega of your office was willing to specify a thickness.