AN OUTLINE OF DEFICIENCIES FOR THE PART B APPLICATION SUBMITTED BY:

International Solvent Recovery, Inc.
6740 Crosswinds Drive, North, Suite D
St. Petersburg, Florida 33710

I.D. #FLD980729610

B-1 - Industries served is not addressed.

B-2 - Information should be submitted based on actual design and layout of the facility. This cannot be properly evaluated until the company decides how the facility will be constructed.

B-3b - Should include an FIA map or equivalent map to indicate flood plain.

B-3b(1)(2) Must be addressed based on B-3b, above.

B-4 - Traffic patterns, controls, access roads, and load bearing capacities are not addressed.

C-1 - Specific waste streams are not included. This information must be included to properly evaluate the remaining sections of the application.

C-1a - Not addressed

C-1b - Cannot be addressed until specific tank construction and design is included.

C-2a - Rationale is not given for the parameters chosen.

C-2b - Test methods are not referenced.

C-2c - Generator sampling method should be included.

C-2d - Need to specify criteria for sampling incoming loads.

C-2e - See C-2d, above. Verification that generator uses representative sampling methods.

C-2f - Specific flash point tests should be included.

D-1a(1) - Mobil tank is defined as a container and is not addressed. Are only 55-gallon drums accepted?

D-1a(2) - No indication that containers are always kept closed during storage. Containers may be allowed to stand in liquids. It appears drums will overhang the pallet. No specific locations for ignitable reactive or incompatible waste. Empty container management not addressed.

D-1a(3) - Does not give adequate information on the capacity of the containment system. Should provide engineering drawings and calculations concerning the curbs, dikes, berms, ditches and trenches.

5-1 a(2) (2nd sentance) ... Demonstrate that pallet dimensions and construction materials are adaquate to support triple stacking.

6-1a(2) (last sentance) ..... Applicant does not demonstrate compliance with National Fire Protection Association standards for stack storage of materials (NFPA-231C)

D-1a(3)(a) - Is not included.

D-1a(3)(b) - Drawing contradicts the narrative as to east to west slope. Should be included in more specific engineer drawings. Specific handling practices should be included.

D-1a(3)(c) - Calculations given are incorrect. You cannot address the other items of this section without final engineering drawings and calcuations. Storm intensity data is not given.

D-1a(3)(d) - Should be included in the engineering drawings with calculations and narrative incorporated into the final site design.

D-1a(4) - Specific details and engineering evaluations are not given.

D-2 - All portions of Section D-2 cannot be adequately evaluated until specific types of tanks are included along with their specific design specs and engineering information.

should

F-1a(2)(b) - The location of the three gates needs to be shown. Adequate explanation of how office personnel will be able to control entrance during operating hours ~~and a statement as to who will be maintaining the keys and all during the hours when the gates are locked.~~ maintain plans to gain access to facility after hours should be included

F-1a(3) - The warning signs need to be placed at all entrances ~~to the gate~~ and in sufficient number to be seen from any approach to the active portions of the site.

not addressed

F-2a - Description of the facility's inspection schedule needs to include the monitoring equipment, the emergency and safety equipment, the security devices, ~~as well as the~~ alarms, containers, contamination center, the fence, the mobil tank and the truck unloading area.

tank

F-2a(1) - All of the potential problems have not been addressed ~~(see F-2a)~~ based on SC.0 F2b

F-2a(2) - This in incomplete because all of the areas have not been addressed ~~(see F-2a)~~. Incomplete based on F2b(1) | F2b(2)

contamination

F-2b(1) - This in incomplete because the contamination system and the mobil tanks have not been addressed.

see page

F-2b(2) - Need a schedule for describing the daily monitoring of the monitoring equipment on the tanks and a procedure for emptying a tank to allow entry and inspection when necessary.

F-2c - The inspection schedule must describe the procedure for taking remedial action when an inspection reveals a problem.

Inspectors name

F-2d - A date and time, the observations made, and the nature of repairs need to be included on the inspection logs.

all

F-3a(3) - ~~Needs detail for the specific steam equipment and use of appropriate solvents for decontamination of the equipment.~~ Is not adequate for emergency

F-3a(4) - ~~The maps show that there are two fire hydrants and the text says there are three.~~ Maps and narrative don't agree on fire hydrants and emergency

F-4 - Prevention of the contamination of the water supplies and the ~~migration~~ mitigation of effects of equipment failure and power outages have not been addressed.

F-5a - Grounding of drums during pumping and pump specifications with respect to sparking have not been addressed.

F-5d - The procedures used to insure that the incompatible wastes and materials are placed in the same containers are in an unwashed containers that previously held incompatible wastes have not been addressed.

F-5f - The applicant does not address incompatible wastes in tanks.

F-2b(1) — This section does not address inspections of the mobile tanks and the integrity of the containment system. ~~and~~

1-2b(1) - The inspection schedule should be revised to address all of the checklist items for the specific tanks to be installed at the facility.

2nd Draft

OK

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St. Petersburg, Florida 33710

I.D. #FLD 980729610

C A-1	The EPA identification number is not included.	C
C A-2	Indicates the forms were attached for Section E.	C
C A-8	The facility contact phone number is inconsistant with the numbers given on page 244 and on the Hazardous Waste Activity Notification form.	C
T A-11	The attached USGS Topographic map should be referenced.	T
C A-14	The EPA identification number is not included.	C
C A-15	The date operation began is not correct. This company is considered as a new facility.	C
T A-16	The amount for process codes S02 should be summed to reflect the total design capacity. The design capacity for the storage processes does not correspond with the information provided in the rest of the application. We are not considering the tank truck as a storage unit.	T
T A-17	The EPA hazardous waste numbers do not correspond with the waste streams given in the other sections of the application or in the Notification form. The unit of measure is not appropriate for reporting the estimated annual quantity of waste.	T
C A-18	One of the site plans provided in the main body of this application should be ~~referenced~~. Referenced to meet this requirement.	C

C - Permit Condition
T - Technical Adaquacy

D-1a(1) The application should include a specific description of the containers addressing: the types, construction materials, dimensions, liner specifications, manufacturer specifications, and waste/container compatibility determinations.

D-1a(2) The applicant should consider container dimensions with respect to pallet size and stacking practices and demonstrate how containers will be stored in a manner that will not cause them to rupture or leak. The maximum height of the containers is not given. The design capacity of the storage area should be reevaluated based on actual container dimensions and building structural supports.

The applicant should address waste type locations for ignitable, reactive and incompatible wastes. Machinery, equipment and procedures for the movement of waste should be addressed. Special detail should be given to loading and unloading ramps (including their design specifications) and the negotiation of curbs with equipment.

D-1a(3) The proposed design drawing of the containment area conflicts with the management practices reported in the text. The description of curbs should include their width. The diagram on page 103 conflicts with the engineering drawing with respect to the uniform thickness of the concrete base. The engineering drawing should include the base grades and slopes. The design specifications of the storage building should be included.

D-1a (3)(a) The applicant should demonstrate that the base material construction and characteristics are compatible with and impervious to the hazardous wastes. Specifications for seams and caulking should be included.

D-1a (3)(b) The diagram on page 105 indicates that drainage will be towards the south on the west side of the storage area. The text and design drawing do not indicate the grade in this direction (see D-1a(3)).

Include the location, function and specifications of the drainage valve for run-off mentioned on page 30. The applicant must demonstrate that the containers will not be in contact with liquids when the system contains accumulated liquids equal to 10% of the design capacity of the storage unit.

D-1a (3)(c) The containment structure capacity cannot be evaluated without further information (see D-1a(1), D-1a(2), and D-1a(3)).

D-1a (3)(d) Is not included.

D-1a(4) The sump pump (portable vacuum pump) design is not included. The location of the discharge point is not given. The applicant should specify the frequency of removal of accumulated liquids from the collection area.

D-2a The tank structural support information is not included. The applicant must designate which design specifications will be used for the flammable solvent tanks and which specifications will be used for the "heavy" solvent tanks. The tank design standard code and year is not included.

B-2 . The maps submitted were inadequate in that:

1. A 1 in:200 ft. site map ~~was not~~ should be included and ~~should~~ contain the following information:

   a. Contours sufficient to show surface water flow.

   b. ~~The site map did not extend~~ the area 1000 ft. beyond the property line.

   c. Surrounding land use ~~was not indicated on the 1:200 site map~~.

   d. Buildings structure and sewers ~~were not located on the 1:200 site map for 1000 ft. from the property boundary.~~

   e. The loading and unloading areas ~~were not found on the 1:200 site map for the drum storage area~~.

   f. No runoff control systems ~~were shown on the 1:200 site map~~.

2. The wind rose was not sufficiently detailed for the site.

3. The withdrawal well noted in the legend was not located on the map.

B-4 On site road surface was not included.

C-1 ~~A lab analysis~~ Laboratory reports of results ~~should be included~~ or existing or published or documented data on the hazardous wastes or hazardous wastes from similar processes were not included. Pure product chemical data is not sufficient for this requirement.

C-2f There is a contradiction between page 2 (Ix., E., Block 3) of the notification (EPA form 8700-12) and page 19 of the text (paragraph 3, line 1) regarding the handling of reactive waste.

Page 2

D-2b The flammable liquids tanks will no longer meet Underwriters Laboratory specifications at the 25% permissible corrosion limit mentioned in the text. Our calculations indicate that 40% overdesign (stated on page 117) has not been achieved according to the specifications on page 126. Tests or documentation to substantiate tank construction compatibility with the wastes has not been included.

D-2c The description of controls to prevent overfilling is insufficient. The application should demonstrate how a one minute warning is sufficient time to operate the waste feed cut off. Insufficient detail is provided for piping, flexible hoses, couplers, valves and pumps. The application should include the design specifications of this equipment. An engineering drawing should be included to indicate the locations of the pumps, piping, intake and discharge structures in the tank storage area.

F-1a(3) The warning signs need to be placed on all entrances to the active portions of the facility (e.g., dirty solvent tank farm and the drum storage facility).

F-2a An overall schedule needs to be submitted to meet the regulatory requirements of this section. A checklist for the operating log is inadequate. In addition, the schedule should address inspections of safety equipment, tank pads and tank anchoring devices, gate and fencing, sump pumps, the forklift and drum handling equipment, the base of the containment system for deterioration in the drum storage area, and any other operating or structural device vital to prevent, detect, or respond to environmental or human health hazards.

This inspection schedule must be kept at the facility. The location and retention of an inspection schedule was not addressed.

F-2a(1) See comment F-2a. Needs to be in a schedule format with each type of probelem addressed.

F-2a(2) See comment F-2a. Needs to be addressed in an overall schedule where all items are addressed ~~including~~ the alarm systems on a daily basis. should be inspected

F-2b See comment F-2a.

F-2b(1) See comment F-2a. Needs to be addressed in an overall schedule where all items are addressed including the secondary containment system in the drum storage area for integrity and accumulated liquids.

F-2b(2) See comment F-2a. All items should be included in a schedule.

The test procedure for tank shell thickness (ultrasound) is not included.

F-2c See comment F-2a.

Does not address remedial actions for all types of problems included in the inspection logs.

F-2d A date for remedial action taken is not specified.

F-4 Prevention of contamination of water supplies was not addressed.

F-5a Mechanical sparking in the drum storage area is not addressed (e.g., steel equipment scraping on the concrete base or other similiar sources of sparking).

F-5b The compatibility matrix does not have a one to one correspondence with the proposed waste streams therefore a conclusion cannot be drawn concerning the compatibility of the waste streams.

~~F-5d Cleaning of drums is not addressed.~~

15

PG Part G Once the facility becomes operational the contingency plan should be amended to include the following items and information: C

G-1 The facility owner or operator's name and a location map deliniating access routes to the site.

G-2 The names, titles, addresses and phone numbers of the emergency coordinator and his alternate. The contradiction noted between page 43 and page 1 of the attached contingency plan should be resolved, designating a permanent emergency coordinator.

G-4g Provisions should be included for the prevention of incompatible waste treatment, storage or location in affected areas until after cleanup has been completed (see C-2f).

G-7 The specific routes of evacuation and the rally points should be included.

PC T G-4c Notification of authorities should ~~to~~ also include the Bureau of Disaster Preparedness for emergencies after normal working hours C T

C/T G-4f The applicant must demonstrate that sufficient storage capacity equal to 10% of the facility design capacity will be maintained for the cleanup of spilled wastes. The steam cleaning equipment listed on page 53 of the text has been omitted from page 15 of the attached contingency plan.

C G-4h An example of the post-emergency equipment checklist should be included. C

C/T G-5 The location of emergency equipment listed on page 15 is not included. First aid and medical supplies are not addressed in the attached contingency plan. Emergency communication and alarm system locations are not addressed in the contingency plan. T

C/T G-6 The description of coordination agreements with local hospitals lacks sufficient detail. There is a contradiction between page 97 and 98, and pages 238 to 241, regarding which information was actually distributed. T

H-1 C

H-1a Need to leave a place for an employees name in the format of the job description. Need to include a position for a training director or incorporate it into one of the existing descriptions, in addition an alternate emergency coordinator needs to be designated.

H-1c
H-1b Training Content, Frequency & Techniques

H-1d Relevance of training to job position is not included.

Once the facility becomes operational the training program should be amended to include the following items and information:

TSR

H-1e Documentation that emergency response training has been successfully completed is not included to demonstrate employee competency in procedures, equipment, and systems.

include in intent of Permit for comment H-1

I-1c The maximum inventory is reported in conflicting volumes between the closure plan (250 drums) and the closure cost estimate (170,880 gals) and fails to address the disposal of the waste produced from decontamination of the tanks, drum storage area, production equipment, and all other contaminated equipment, in the event the production facility is inoperable upon closure.

I-1d A ~~discrete~~ inventory of all contaminated equipment requiring decontamination is not included.

I-1d(1) See comment I-1c above.

I-1d(2) See comment I-1c above.

I-4 Closure cost estimate fails to account for off site disposal of the waste produced from decontamination of the tanks, drum storage area, production equipment, and all other contaminated equipment, in the event the production facility is inoperable upon closure.

K ~~Engineering certification~~ Engineering certification should be included on all drawings in the text.

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I.D. #FLD 980729610

C	A-1	The EPA identification number is not included.
C	A-2	Indicates the forms were attached for Section E.
C	A-8	The facility contact phone number is inconsistant with the numbers given on page 244 and on the Hazardous Waste Activity Notification form.
T	A-11	The attached USGS Topographic map should be referenced.
C	A-14	The EPA identification number is not included.
C	A-15	The date operation began is not correct. This company is considered as a new facility.
C/T	A-16	The amount for process codes S02 should be summed to reflect the total design capacity. The design capacity for the storage processes does not correspond with the information provided in the rest of the application. ~~Is the tank truck to be considered as a storage unit?~~ we will not consider tank truck
C/T	A-17	The EPA hazardous waste numbers do not correspond with the waste streams given in the other sections of the application or in the Notification form. ~~The annual quantity reported substantially exceeds the reclamation capacity of this facility.~~ The unit of measure is not appropriate for reporting the estimated annual quantity of waste.
T	A-18	One of the site plans provided in the main body of this application should be referenced.

Suggested catagories for the O/D comments

C = Completeness
T = Technical Assessment
PC = Permit condition

T/C D-1a(1) The application should include a specific description of the containers addressing: the types, construction materials, dimensions, liner specifications, manufacturer specifications, and waste/container compatibility determinations.

C/T D-1a(2) The applicant should consider container dimensions with respect to pallet size and stacking practices and demonstrate how containers will be stored in a manner that will not cause them to rupture or leak. The maximum height of the containers is not given. The design capacity of the storage area should be reevaluated based on actual container dimensions and building structural supports.

The applicant should address waste type locations for ignitable, reactive and incompatible wastes. Machinery, equipment and procedures ~~should be addressed~~ ~~used to access and egress containers to the storage structure should be addressed.~~

C D-1a(3) The proposed design drawing of the containment area conflicts with the management practices reported in the text. The description of curbs should include their width.

C/T D-1a (3)(a) The applicant should demonstrate that the base material construction and characteristics are compatible with and impervious to the hazardous wastes. Specifications for seams and caulking should be included.

T D-1a (3)(b) The diagram on page 105 indicates that drainage will be towards the south on the west side of the storage area. The text and design drawing do not indicate the grade in this direction. see D1a3

C/T Include the location, function and specifications of the drainage valve for run-off mentioned on page 30. The applicant must demonstrate that the containers will not be in contact with liquids when the system contains accumulated liquids equal to 10% of the ~~volume of containers~~ design capacity of the storage unit.

C/I D-1a (3)(c) ~~The tank truck has not been evaluated as a hazardous waste storage unit.~~ The containment structure capacity cannot be evaluated without further information (see D-1a(1) and D-1a(2)). D1a3

C D-1a (3)(d) ~~The applicability of run-on control cannot be determined without site specific contour information (see B-2).~~ is not addressed

PC T D-1a(4) The sump pump (portable vacuum pump) design is not included. The location of the discharge point is not given.

C D-2a The tank structural supports information is not included. ~~The tank design standard code and year is not addressed.~~ The applicant must designate which design specifications will be used for the flammable solvent tanks and which specifications will be used for the "heavy" solvent tanks. The tank design standard code and year is not included.

C/T D-2b The flamable liquids tanks will no longer meet Underwriters Laboratory specifications at the 25% permissible corrosion limit. Our calculations indicate that 40% overdesign (stated on page 117) has not been achieved according to the specifications on page 126. Tests or documentation to substantiate tank construction compatibility with the wastes has not been included.

PC T D-2c The description of controls to prevent overfilling is insufficient. The application should demonstrate how a one minute warning is sufficient time to operate the waste feed cutoff. Insufficient detail is provided for the piping, couplers, values and pumps. The application should include the design specifications for this equipment.

Page 5 - Reactive waste listed on notification.

Page 11 - Check key to main gate during non-operation hours.

Page 14 - Check open hours of airport industrial complex for gates after normal operating hours.

Page 22 - Check separate area for chlorinated solvents in the drum storage area.

Page 22 - Check training for receiving manager for drum inspections.

Page 26 - Check location of waste in storage area and how this will be recorded.

Page 29 - Says remedial action will be on the inspection form.

Page 30 - Check parameters for inspection.

Page 34 - Include date for remedial action on incident report form.

Page 18 - Check generator containers.

Page 41 - Check applicability of response in the production storage tank area.

Page 42 - Check applicability of spills in transfer operations.

Page 47 - Specific emergency coordinator as part of permit conditions.

Page 48 - Check legality of authorization.

Page 50 - Pump specifications for leakers.

Page 50 - Check practicality of pumping leaked material into another drum.

Page 50 - Cleanup should specific equipment to be used.

Page 51 - There is no indication of verification of decontamination.

Page 51 - Emergency spill equipment should include pumps.

Page 53 - Make sure training addresses familiarity with chemicals handled.

Page 54 - Specifications for the pump should be included.

Page 54 - May include provision for designating a tank for spills.

Page 56 - Should include location of the fire alarm.

Page 58 - Check for water as decontamination medium.

Page 59 - Check permit condition for revising the training.

Page 59 - The contingency plan should include more concrete steps to be taken by the emergency coordinator.

Page 63 - Check triple at fire fighting sytem.

Page 95 - Alarm system should be included in the contingency plan.

Page 95 - Drawings illegible.

Page 96 - Permit conditions should include location of fire extinguishers.

Page 96 - Check employee to remain onsite to assist fire department.

Page 100- Check calculations for maximum inventory of drums.

Page 103- Forklift will have difficulty getting over curb.

Page 103- Emergency equipment will have to move through standing liquids to get at leaking drums.

Page 104- Check calculation for containment area.

Page 106- Check construction detail for storage pad.

Page 106- Check thickness of concrete pad.

Page 121- Check criteria for venting requirements; check calculations.

Page 122- Check 250 gallon-per-minute flow rate.

Page 123- Check procedure for discharge of liquid into sewers.

Page 123- Check sufficient unused storage capacity to accomodate the spill from the largest tank.

Page 125 & 126- Don't see any difference in the tanks.

H-1e A test for emergency response training is not administered to demonstrate employee competency in procedures, equipment, and systems.

I-1c The maximum inventory is reported in conflicting volumes between the closure plan (250 drums) and the closure cost estimate (170,880 gals) and fails to address the disposal of the first contaminated rinse batch from the tanks and drum storage area in the event the production facility is inoperable upon closure.

I-1d A discrete inventory of all contaminated equipment requiring decontamination is not included.

I-1d(1) See comment I-1c above.

I-1d(2) See comment I-1c above.

I-4 Closure cost estimate fails to account for off site disposal of the first batch of contaminated rinse water.

K Eng. cert. ?

5+ Diff

B-2 The maps submitted were inadequate in that:

P/C 1. The 1 in:200 ft. site map did not include contours sufficient to show surface water flow.

P/C 2. The site map did not extend 1000 ft. beyond the property line.

T 3. Surrounding land use was not ~~thoroughly~~ indicated on the 1:200 site map.

T 4. The wind rose was not sufficiently detailed for the site.

C 5. The withdrawal WELL noted in the legend was not located on the map.

P/C 6. Buildings structure and sewers were not located on the 1:200 site map for 1000 ft. from the property boundary.

P/C 7. The loading and unloading areas were not found on the 1:200 site map for the drum storage area.

C 8. No runoff control systems were shown on the 1:200 site map.

B-4 Road surfacing, C-1 Plant Condition

C-2f There is a contradiction between page 2 (Ix., E., Block 3) of the notification (EPA form 8700-12) and page 19 of the text (paragraph 3, line 1) regarding the handling of reactive waste.

T D

F-1a(3) The warning signs need to be placed on all entraces to the active portions of the facility (e.g., dirty solvent tank farm and the drum storage facility) ~~and are not necessary on the perimeter fence~~.

P/C

F-2a An overall schedule needs to be submitted to meet the regulatory requirements of this section. A checklist for the operating log is inadequate. In addition, the schedule should address inspections of safety equipment, tank pads and tank anchoring devices, gates and fencing, sump pumps, the forklift and drum handling equipment, the base of the containment system, deterioration in the drum storage area, and any other operating or structural device vital to prevent, detect, or respond to environmental or human health hazards.

T

For

This inspection schedule must be kept at the facility. The location and retention of an inspection schedule was not addressed.

T F-2a(1) See comment F2a. Needs to be in a schedule format with each type of probelem addressed.

T F-2a(2) See comment F-2a. Needs to be addressed in an overall schedule where all items are addressed including the alarm systems on a daily basis.

T F-2b See comment F-2a.

F-2b(1) See comment F-2a. Needs to be addressed in an overall schedule where all items are addressed including the secondary containment system in the drum storage area for integrity and accumulated liquids, ~~as well as the mobile containers for waste solvent~~.

F-2b(2) See comment F-2a. All items below should be included in a schedule:

~~1. area surrounding the tanks (8) is not included~~

2. procedure for assessing the internal and external condition of the tank is not addressed in the schedule

3. daily check of tank monitoring equipment to verify operation i.a.w. tank design specs.

F-2c ~~There are two manuals that are referenced to but not included~~ for review (i.e., Emergency Procudures Manual and Emergency Response Manual). ~~Does not address remedial actions for all types of problems included in the inspection logs~~ (e.g., tank monitoring, drums in poor condition, empty fire extinguishers, non-operating equipment, valves, communication system failure, fence deterioration, ~~mobile tank leaks~~, etc.).

F-4 Prevention of contamination of water supplies was not addressed.

F-5d No cleaning of drums is ~~mentioned~~.

F-5a Mechanical sparking in the drum storage area is not addressed (e.g., steel equipment scraping on the concrete base or other similiar sources of sparking).

F-5b ~~C~~ The compatibility matrix does not have a one to one correspondence with the proposed waste streams therefore a conclusion cannot be drawn concerning the compatibility of the waste streams.

contingency plan should be revised as noted and resubmitted

C G-1 The facility owner or operator name should be included in the contingency plan. The site plan should include access routes to the facility.

PC G-2 The name, title, address and phone number of the alternate emergency coordinator is not included. There is a contradiction on pages 43, 47, and page 1 of the attached contingency plan. Is the plant manager or the technical director the primary emergency coordinator?

PC T G-4c The hazard assessment procedures lack sufficient detail. Toxic fumes and hazards from vapor clouds are not addressed. Notification of authorities should include the FDER. and BOP

PC G-4f An explosometer (mentioned on page 9) should be included on the emergency equipment list. The first aid kit and steam cleaning equipment listed on page 53 of the text has been omitted from page 15 of the attached contingency plan.

T G-4g The applicability of this section cannot be determined pending clarification of the waste streams and their compatibility.

G-4h An example of the post-emergency equipment checklist should be included. All emergency equipment must be dedicated for use during an emergency. Equipment which has other routine operation functions cannot be listed as emergency equipment.

C/ T G-5 The location of emergency equipment listed on page 15 is not included. First aid and medical supplies are not addressed in the attached contingency plan (see G-4f). Emergency communication and alarm system locations are not addressed in the contingency plan.

T G-6 The description of coordination agreements with local hospitals lacks sufficient detail. There is a contradiction between page 97 and pages 238, 239, 240, and 241. Was a copy of the contingency plan submitted to local hospitals and emergency response teams?

PC G-7 The specific routes for evacuation and the rally points are not included.

H-1a Need to leave a place for an employees name in the format of the job description. Need to include a position for a training director or incorporate it into one of the existing descriptions in addition an alternate emergency coordinator needs to be designated.

H-1c Designated training director has no hands on experience in solvent reclamation facilities and less than one year total work experience in RCRA related issues.

H-1d Relevance of training to job position is not included.