

Application Part II.A.7 Manifest System **Recordkeeping** and Reporting

7. Attach a copy of the procedures used to comply with 264.12 and 40 CFR Part 264, Subpart E (Manifest System, Recordkeeping, and Reporting).

Pages 2A-15 through 2A-23 addresses this question.

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MANIFESTS, RECORDKEEPING, AND REPORTING

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1.0 INTRODUCTION

This section of the permit application describes the procedures used to record and maintain information required by hazardous waste regulations for the waste management operations conducted at the facility. It also describes the system used to complete and review shipping documents and to address deficiencies and discrepancies discovered in the documents by the review process. The hazardous waste regulations contain requirements to report information pertaining to incidents and operations related to waste management activities at the facility.

2.0 OBJECTIVES

This part of the permit application describes the process used by the facility to:

Review and process inbound shipping documents and resolve deficiencies and discrepancies found in the documents and in the shipment.

Review inbound waste shipments and record management activities used to process the waste and to track the waste from the inbound shipment to the outbound shipment.

Prepare and process outbound shipping documents for shipment and resolve deficiencies and discrepancies found in the documents and in the shipments.

Manage transfer facility waste and unauthorized waste shipments.

Complete, submit, and maintain records and reports related to incidents and operations at the facility.

3.0 SHIPPING DOCUMENTS

Shipping documents are the paperwork prepared by the generators, and the hazardous waste permitted facility, that must accompany hazardous waste shipments during transportation to off-site facilities. The generator must complete the shipping documents for shipments originating at the generator site. Similar responsibilities apply to the hazardous waste treatment, storage, and disposal facilities (TSDFs) when shipments originate at the TSDF. The shipping documents consist of the following:

The uniform hazardous waste manifest
The land disposal restriction (LDR) notification form and

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The universal treatment standard (UTS) notification form

The LDR and UTS forms are combined and are required to accompany the first (i.e., initial) shipment only. They are optional for subsequent shipments.

4.0 INBOUND SHIPMENTS

TSDFs are required to inspect shipments and review accompanying manifests to assure the waste received coincides in type and size with the manifest and that the information provided in the LDR and UTS notifications (when required to accompany the shipment) complies with the regulations. The first step in this process consists of inspecting the shipment to identify the drums listed on the manifest(s). All waste that is received by the facility is assigned a barcode label. Operators at the facility inspect the incoming hazardous waste label and the container type and count the number of drums in the shipment for each waste stream and place the barcode label next to the original shipping label. During this process the description of the waste is verified, and the number and type of containers must match the manifest description. Inadequate and incomplete markings on the hazardous waste label are amended by the facility operators. Discrepancies regarding the shipment and the manifest are noted on the manifest and on the online tracking system.

Following the inspection of the shipment and manifest by facility operators, the manifest, the LDR and UTS notification forms (when provided with the shipment), are forwarded to a competent person for review. The review is to verify that the shipping documents are in compliance with the regulations and to resolve discrepancies and deficiencies discovered in the shipment and in the documents. Specific objectives of the review are:

Take notice of discrepancies discovered during the waste receiving operation.

Ensure that the manifest has been completed in accordance with standards in the Rule 62-730.160 F.A.C., and in Subpart B of the 40 CFR Part 262.

Verify that the LDR and UTS notification forms (when required by regulations to accompany the shipment) comply with the requirements of Part 268.

Notify the generator of discrepancies and deficiencies discovered in the shipment, manifest, and/or LDR and UTS notification forms. All discrepancies must be resolved within 15 days of shipment receipt.

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To comply with the regulations of 264.71(b)(2), shipment and manifest discrepancies, as well as regulatory deficiencies contained in the manifest, are noted in item 18a of the manifest. A copy of the manifest is signed and dated by the facility and returned to the generator within 30 days of waste delivery. The manifest discrepancy notifications are generated automatically by our custom-made computer tracking program and are used by the facility to resolve problems related to shipments and shipping documents. The generator is requested to notify the facility within 15 days of the waste delivery date on the resolution of the problem. In most cases the problem is resolved in the manner indicated in the form without the generator revisions. However, in cases of missing or incomplete documents, or when the waste is significantly different from the one described in the evaluation documents, active involvement of the generator becomes necessary. The waste analysis plan describes methods to determine when an incoming waste is significantly different from the one approved for shipment to the facility. Failure to resolve discrepancies will result in return of the shipment to the generator, or to an alternate facility designated by the generator.

5.0 PROCESSES AT THE FACILITY

The previous sub-section describes procedures utilized by the facility to review inbound shipping documents and to resolve regulatory deficiencies and discrepancies discovered in the shipment and in shipping documents. This sub-section deals with the system the facility uses to record the processes undergone by the waste accepted by the facility.

Triumvirate Environmental Services, Inc. uses a custom computer application to track and account for individual waste containers as they are received stored, handled, re-packaged, consolidated or stabilized and shipped out of the facility. The application and database is called PERMIT and it is housed in servers. PERMIT can be accessed by staff members via a secured internet connection and password at any location, at any time. A general description of PERMIT and how it functions is indicated below.

PERMIT is an electronic system that tracks all waste that is at the Triumvirate Environmental Services, Inc. facility. Wasteland is an electronic program that creates manifests, shipping documents, packing slips, LDRs, and manages profiles. All waste that is accepted at the facility needs to be accepted into PERMIT. This can be done by importing a manifest from wasteland or by manually entering the manifest into PERMIT. All waste that is accepted at the facility is given a barcode label from PERMIT. Transfer Waste is accepted in PERMIT but it is not barcoded. Barcode labels are printed by facility staff members and adhered to the appropriate containers before the containers are accepted at the facility. Facility staff members are responsible for updating the information in the barcode system to reflect the storage location of each container in the facility. Facility staff members use hand held barcode scanners to update the application database whenever any container is moved, repackaged, consolidated, stabilized or manipulated within the facility. The application database is also updated whenever containers are shipped out of the facility. All outbound manifests from the facility are created from PERMIT to keep the inventory in PERMIT accurate.

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The barcode labels on the drums contain process codes which dictate how the waste can be handled. The process codes are assigned to the waste profiles before the waste is accepted at the facility and they are assigned by competent facility employee(s). When a waste is accepted in PERMIT the barcode will track the waste and the DOT shipping description will determine where it can be stored.

The server which houses the Triumvirate Environmental Services, Inc.'s computer application and its database is connected to the internet. On a daily basis, the data that has been collected through the use of the application is exported to a secure electronic data storage repository located outside the facility property.

At any time software upgrades may occur and electronic tracking systems may change. Any change will not affect the general tracking as previously described.

6.0 OUTBOUND SHIPMENTS

The facility prepares shipping documents for waste shipments that originate at the facility. Manifests are printed by either PERMIT or Wasteland and both programs interact with each other and store shipping manifests, profiles and other related documents. This data management system maintains files for outbound waste streams that have been approved by off-site facilities. Off-site facilities approve waste streams for treatment and disposal prior to shipment from Triumvirate Environmental Services, Inc. The outbound system is similar to the inbound system. Information from outbound approvals is inputted into PERMIT and Wasteland, which are used to print manifests for outbound shipments. Outbound shipments are only printed from PERMIT to keep the inventory in PERMIT accurate. The waste that is sent to a TSDF will meet the characteristics of the profile. The Waste Analysis Plan describes the procedures that should be used to determine the DOT description and the hazardous waste codes that should be used for outbound wastes. The same procedures also address the method that is used to complete LDR and UTS notification forms. After completion, the manifest, LDR and UTS notification forms (when applicable) are submitted to a competent person for review to assure compliance with regulations.

Waste shipments that originate from the Triumvirate Environmental Services, Inc. facility may be classified as follows:

- Waste bulked in containers such as tankers, roll-off boxes, dump trailers, totes, cubic yard boxes, or containers having a smaller size.
- Lab pack containers.
- Waste in transfer consisting of waste that was not removed from the transportable containers received by the Triumvirate Environmental Services, Inc. facility.

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The first step in preparing a waste shipment consists of completing a list of inbound waste containers contents included in the outbound shipment. The shipment preview report is generated from that list which shows, among other things, the barcode number affixed to the container, the location where the drum is located onsite, the container size, type of container and profile number for the contents from every inbound waste container in the outbound load. For waste bulked at the facility the shipment preview report is completed from the data management system that tracks the movement of bulked wastes. A manifest is then prepared for the bulked materials from the system.

7.0 TRANSFER FACILITY

Triumvirate Environmental Services, Inc. operates a transportation fleet that has been licensed by the State of Florida to transport hazardous waste. Triumvirate Environmental Services, Inc. facility in Orlando is also a hazardous waste transporter and also operates a transfer facility which allows waste to be held in transit for up to ten days.

Waste regulated by transfer facility requirements is a waste transported on a manifest that shows as a designated facility one which is not Triumvirate Environmental Services, Inc. and is referred to as Transfer Waste. Currently, the transfer facility waste is managed in trailers parked at the loading dock. Containers holding transfer facility waste are only placed in the container storage unit when no space is available for transfer from trailer to trailer, which rarely happens. ~~When waste is placed inside the facility it is clearly separated from permitted waste and segregated to clearly identify it as 10-day transfer waste.~~ **Transfer waste will be placed in a designated area or row on the dock, within a designated area in the facility, or on designated transfer trailers. Each area will be marked to indicate it is for transfer waste only.**

Provisions in Rule 62-730.171, F.A.C. specify that transfer facilities must have a written contingency and emergency plan that meets the requirements of 40 CFR Part 265, Subpart D, and a written closure plan that conforms to 265.111, 265.112(c), 265.114, and 265.115. This subsection complies with this requirement. Transfer facilities are also required to maintain written records showing arrival and departure dates for transfer waste, as well as the generator's name and EPA I.D. No. and the document number for the manifest used to ship the waste. Triumvirate Environmental Services, Inc. logs in the information described for waste streams that arrive at The Facility and records the departure date when each transfer facility waste and permitted waste shipment leaves the facility. The information is stored in PERMIT and can be printed at any time.

The number of drums holding transfer facility waste in the container storage unit at any time is not expected to be a large number. Drums to be transferred from one trailer to another may be grouped together in the unit and/or at the specified 10-day location as posted on the dock. These drums have the following unique markings and features when located in the container storage unit:

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The approval code written on permitted waste drums contain characters that identify them as Triumvirate Environmental Services, Inc. approval codes; transfer facility waste drums do not show Triumvirate Environmental Services, Inc. approval codes.

Every permitted waste drum in the container storage unit is clearly separated from Transfer Waste drums. Transfer Waste drums do not show drum barcoded stickers marked on their sides and are segregated and identified to clarify that they are 10-day transfer waste.

A box located inside the office will be designated and identified to hold manifests showing transfer facility waste placed in the cell, or designated area for that waste code.

Transfer waste will be placed in a designated area or row on the dock, within a designated area in the facility, or on designated transfer trailers. ~~Transfer facility drums will be placed on the dock or transfer trailers.~~ Only wastes having compatible DOT hazard classes will be placed together. Incompatible wastes will be placed on pallets having integral containment systems.

8.0 UNAUTHORIZED WASTE SHIPMENTS

When inbound waste streams are tested and inspected in accordance with the procedures described in the Waste Analysis Plan and are found not to conform to information provided in the waste profile evaluation documents, these waste streams are subject to the procedures explained below. Regulations in 40 CFR 264.72(c) indicate the facility may resolve discrepancies in waste types within 15 days from the date the waste in question was received and if not resolved the FDEP must be notified. The first step to resolve a discrepancy created by a non-conforming waste is to obtain instructions from the generator indicating whether the waste should be returned to the generator or an amendment to the waste evaluation documents to correct the deficiencies discovered by the verification process is possible. If the generator chooses to amend the evaluation documents, the waste profile must be modified by the generator and, depending on the nature of the discrepancy, additional analyses or SDSs may be required. If it is found that the waste can be processed by Triumvirate Environmental Services, Inc., under its permit, a corrected letter of approval is issued, and processing of the waste is initiated. If efforts to resolve the discrepancy determine the waste should be assigned waste codes not permitted at the facility, or that the waste exhibits characteristics prohibited at the facility, the waste in question must be rejected by Triumvirate Environmental Services, Inc. Under instructions from the generator, the facility has the option to ship the waste back to the generator or to manage the waste under the transfer facility provisions of Rule 62-730.171 F.A.C., which requires shipment of the waste to an off-site facility within ten days after the discovery date. Waste exhibiting characteristics prohibited at the facility are shipped out immediately after discovery as specified by the generator.

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9.0 OPERATING RECORDS

Movement of waste within the facility is controlled and recorded to establish the identification and disposition of the wastes. Incoming and outgoing wastes are monitored and recorded to maintain an inventory of the waste at the facility. Documents providing characterization of waste shipped and received at the facility, shipping documents, personnel training records, safety inspection records, incident records, and process, operation and safety equipment inspection records and logs are maintained in an organized manner. The records and logs referenced above are as required by 40 CFR 264.73.

10.0 REQUIRED REPORTS AND NOTIFICATIONS

Triumvirate Environmental Services, Inc. will comply with the reporting requirements listed below:

Hazardous waste biennial report for generators, as required by 40 CFR 264.75;

Exception reports when the shipper of hazardous waste has not received confirmation of delivery from the designated facility

Notification of intent to export hazardous waste, when required by 262.53;

Exception reports for exports of hazardous waste for which a copy of the manifest from the transporter or confirmation of delivery has not been received, as indicated in 262.55;

Annual report for exported hazardous waste, as required in 262.56;

Notification that the facility has arranged to receive hazardous waste from a foreign source, as required in 264.12(a);

Notification to generators shipping hazardous waste to the facility indicating that the facility has the appropriate permits, as required in 264.12(b);

Notification to new owner or operator before transferring ownership or operation of the facility of the requirements in Parts 264 and 270, as required in 264.12(c);

Reports of incidents requiring the implementation of the contingency plan, when required in 264.56(i). Letter describing manifest discrepancies that have not been resolved within 15 days, as required in 264.72(b);

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Hazardous waste biennial report for permitted facilities, as required in 264.75;

Unmanifested waste reports, as required in 264.76;

Reports indicating effectiveness of a corrective action for releases, as required in 264.100(g).

Reports of exceedances of the air emission standards for containers, as required in 264.1090;

Notices of planned changes to the permitted facility, in accordance with 270.30(1)(1);

Notices of anticipated non-compliance situations at the facility, as required in 270.30(1)(2);

Twenty-four-hour report of non-compliance situations which may endanger health or the environment, in accordance with 270.30(1)(6)

11.0 AVAILABILITY, RETENTION, AND DISPOSITION

Records, logs, notices, sheets, reports, or documents mentioned in the preceding paragraphs are maintained at the facility for the period of time required by the applicable regulation. Record maintenance is extended automatically during the course of any unresolved enforcement action. These documents are available to the appropriate regulating agency or personnel upon request.