

# Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406

Lawton Chiles, Governor

Telephone: 407/433-2650

Carol M. Browner, Secretary

Fax: 407/433-2666

JAN 25 1993

## HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT ☐ COMPLAINT ☒ ROUTINE ☐ FOLLOW-UP ☐ PERMITTING

FACILITY NAME Safety Kleen/Boynton Beach Facility DER/EPA ID FLD984167791

ADDRESS 46B Quantum Industrial Park  
Boynton Beach, Florida 33426

COUNTY Palm Beach

PHONE (407)736-1339

DATE 10/9/92

TIME 10:00 AM

### TYPE OF FACILITY:

#### GENERATOR

☒ Generator (> 1000 kg/mo)  
☐ SQG (100-1000 kg/mo)  
☐ CESQG (< 100 kg/mo)  
☐ Non-Handler

#### STORAGE

☒ Container  
☒ Tank  
☐ Waste Pile  
☐ Surface Impoundment

#### TREATMENT

☐ Tank  
☐ Land Treatment  
☐ Thermal  
☐ Chem/Phys/Bio  
☐ Incinerator  
☐ Surface Impoundment

#### TRANSPORTER

☒ Transporter  
☐ Transfer Facility

#### DISPOSAL

☐ Landfill  
☐ Surface Impoundment  
☐ Waste Pile

2. Applicable Regulations:

☐ 40 CFR 261.5 ☒ 40 CFR 262 ☒ 40 CFR 263 ☒ 40 CFR 264  
☒ 40 CFR 265 ☐ 40 CFR 266 ☒ 40 CFR 268

3. Responsible Official: (Name and Title)

Thomas Sands, Branch Manager

4. Survey Participants and Principal Inspector:

Jane Gregory, Tim Gray, Jay Hess--FDER  
Thomas Sands, Glenn Crouse--Safety Kleen

5. Facility Latitude: 26°32'22" Longitude: 80°04'55"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit Number: HO 50-195905 Date Issued: 8/26/91 Expiration Date: 8/26/96

8. Pre-arranged Inspection: ☐ Yes ☒ No Preinspection letter mailed.

SAFETY KLEEN CORPORATION  
BOYNTON BEACH FACILITY  
INSPECTION REPORT

FLD984167791  
GENERATOR  
TRANSPORTER  
STORAGE FACILITY

BACKGROUND

On October 9, 1992, a routine hazardous waste compliance inspection was conducted at Safety Kleen Corporation (SK) located at 5610 Alpha Drive, Boynton Beach, Palm Beach County, Florida, 33426. SK sells and distributes raw solvents and collects spent solvents, used oil and oil filters, used antifreeze, and waste paint related materials for recycling. On August 26, 1991, this facility received a Department Permit (H0 50-195905) to operate a hazardous waste storage facility.

The inspection was hosted by Tom Sands, Branch Manager, and Glenn Crouse, Facility Manager. Department personnel who attended the inspection were Tim Gray, Jay Hess, and Jane Gregory. At the time of the inspection, SK had 14 trucks operating from the facility to transport waste and product to and from customer's businesses in containers of 5, 16, and 30-gallon capacities. At the customer's site, the raw product is exchanged for spent material which is transported back to the facility. All spent perchloroethylene (F002), waste paint related material (F003, F005), and sludges generated from the various solvents are left in their containers and placed into the waste storage area. The inspection consisted of the loading dock, waste storage, fluid recovery service dock, and tank farm areas, in addition to the facility record review.

INSPECTION

When containers of dirty mineral spirits are brought into the facility, they are unloaded onto the loading docks and immediately emptied into one of two "dumpsters." Each dumpster is a machine equipped with both a brush attachment for removing sludge and debris from the containers, and also a reservoir for temporary containment of the waste mineral spirits. After the containers are cleaned out using the spent mineral spirits, the waste is pumped via pipeline to a 15,000 gallon storage tank located inside the on-site hazardous waste/raw product tank farm building. Clean containers are refilled at the loading dock with raw mineral spirits pumped from the raw material tank in the tank farm building. After filling, the containers are loaded back onto the trucks for delivery to customers on the next business day.

The floor surrounding the loading dock is a bermed area with a sump. Any spills are accumulated in the floor sump and then pumped to the spent mineral spirits tank. As stated in the previous inspection report for this facility, the floor had patches of bare concrete visible in areas where the sealant had begun to peel. According to Mr. Sands, the floor was already repaired since our last inspection, and they have contacted the contractors again to repair the floor a second time.

The next area inspected was the fluid recovery service (FRS) loading dock. In this area, empty antifreeze storage containers were being staged for delivery to customers. Each container has a secondary containment vessel built into the unit which gives an added defense against any possible leakage which might occur from damage to the unit.

Adjacent to the main mineral spirits loading dock is the hazardous waste container storage area.

During the inspection, containers were being accumulated on pallets for staging prior to shipment. Types of wastestreams present included waste oil, oil filters, paint related material, immersion cleaner, perchloroethylene, perchloroethylene filters, and solvent sludge. The area was in compliance with SK's permit requirements. Random generators were chosen from the hazardous waste labels on the drums for paperwork tracking inspection.

Directly adjacent to the waste container storage area is the FRS waste storage area. In the permit it is stated that the FRS waste is to be maintained in permanently designated, distinctly separate area. No waste was present for inspection.

After the container storage area, we inspected the tank farm which consists of five aboveground tanks of varying capacities within secondary containment inside a totally enclosed building. The five tanks are:

20,000 gallon used oil  
20,000 gallon spent antifreeze  
15,000 gallon raw mineral spirits  
5,000 gallon raw perchloroethylene  
15,000 gallon spent mineral spirits

The 15,000 gallon spent mineral spirits tank and the 20,000 gallon spent antifreeze tank are the only tanks regulated by the hazardous waste permit.

#### RECORD REVIEW

SK was asked to produce manifests, biennial reports, training records, contingency plan, and land disposal certifications for the period since our last inspection of November 5, 1991. All records were maintained in an orderly fashion which facilitated an efficient record review. Approximately 200 manifests were inspected, which included both incoming and outgoing waste shipments. Records from waste in the container storage area were provided and inspected. All land disposal certifications were inspected as required by regulation. No record discrepancies were noted, and all records appeared to be in compliance.

#### DEPARTMENT FINDINGS

SK Boynton Beach is a permitted hazardous waste storage facility, a hazardous waste transporter, and a large quantity generator of greater than 1000 kg per month of hazardous waste. No hazardous waste violations were found.

Facility personnel were cooperative. Future reinspections will be conducted to ensure proper management of hazardous wastes.

cc: Office of General Counsel, DER, Tallahassee  
Palm Beach County Public Health Unit  
Kenneth Lapierre, EPA Region IV, Atlanta  
West Palm Beach DER Permitting file  
West Palm Beach DER Compliance file  
File, Reporting Coordinator

Date 10/9/91  
Inspector GRAY GREGORY HESS  
Facility ID# FD 984767791

RCRA INSPECTION REPORT  
GENERATOR'S CHECKLIST

Note: On multiple part questions, check those not in compliance.

Section A - Site Identification No.

1. Site Name: SAFETY-KLEEN / BOYNTON BEACH
2. Responsible Official: THOMAS SANDS - S-K
3. Survey Participants: JIM GRAY, JANE GREGORY, JAY HESS - FDR  
THOMAS SANDS, GLENN CROUSE

Section B - Hazardous Waste Determination (262.11)

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30-261.33 - List of Hazardous Waste)? ☒ Yes ☐ No
  - a. If yes, list wastes, EPA numbers and quantities. DD01, F002, DD06, DD07  
DD08, F003, F005, F004
2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, toxicity characteristic) (261.20-261.24 - Characteristics of Hazardous Waste) ☒ Yes ☐ No
  - a. If yes, list wastes, EPA numbers, and quantities. \_\_\_\_\_
  - b. Does generator determine characteristics by testing, by product knowledge, or by applying process knowledge? ☒ Yes ☐ No ALL THREE
    - (1) If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☒ Yes ☐ No
    - (2) If equivalent test methods used, attach copy of equivalent methods used. \_\_\_\_\_
3. Is generator subject to full regulation under Part 262? ☒ Yes ☐ No  
(If no, check appropriate exemptions)

Conditionally exempt small quantity generator (261.5 - Special requirements) (Describe small quantity disposal practices and checklist) \_\_\_\_\_

OR

Produces non-hazardous waste at this time (261.4 - Exclusions) \_\_\_\_\_

OR

Recycles, reclaims, uses or reuses hazardous waste at this time (261.6 - Exclusions) (Describe how this is achieved.) \_\_\_\_\_

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FAD 957 11-7 791OR

Being a farmer disposing of waste pesticides for his own use on his own property (262.10(d) - Farmers)

OR

Burns hazardous waste as a fuel for the purpose of recovering usable energy (266.30(c)(2))

Section C - Manifest (262.20-262.23)

*Also use contractual agreement  
Exemption for SOG's.*

1. Has generator shipped hazardous waste off-site since November 19, 1980? (Subpart B - The Manifest) ☒ Yes ☐ No

- a. If no, do not fill out Section C and D.
- b. If yes, identify primary off-site facilities.  
List facilities in narrative report.

2. Does generator use manifest? (262.20 - General requirements) ☒ Yes ☐ No  
Is EPA form 8700-22 (Rev 9-88) used? ☒ Yes ☐ No

If yes, inspect manifests at random. Do all manifests reviewed include the following information?  
(262, Appendix) (Check items not on manifest.)

- a. Generator EPA ID No. ☒ Yes ☐ No
- b. Manifest Document No. ☒ Yes ☐ No
- c. Generator's Name, Mailing Address, Telephone No. ☒ Yes ☐ No
- d. Transporter(s) Name, EPA I.D. No., Telephone No. ☒ Yes ☐ No
- e. Facility Name, Address, EPA I.D. No., Telephone No. ☒ Yes ☐ No
- f. DOT description of the waste ☒ Yes ☐ No
- g. (1) Containers (number and type) ☒ Yes ☐ No  
(2) Quantity (weight or volume) ☒ Yes ☐ No
- h. EPA waste no. ☒ Yes ☐ No
- i. Emergency Information (optional)  
(Special handling instructions, Phone No.) ☒ Yes ☐ No
- j. Is the following certification on each manifest form? ☒ Yes ☐ No

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and

DATE 10/9/92  
FACILITY ID FLD 937167741

are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.

k. Signatures and dates

(1) Generator	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
(2) Transporter	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
(3) Disposer (returned copy)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

l. Indicate number of manifests inspected and number of violations.  
Note type of violation in report.

~ 200

m. If copy of manifest from facility was not returned within 35 days, did generator file an exception report? (262.42 - Exception reporting)

N/A HAVE NOT HAD TO FILE  
☐ Yes ☐ No

If yes, did it contain the following information?  
Legible copy of manifest

☐ Yes ☐ No

AND

Cover letter explaining generators efforts to locate waste.

☐ Yes ☐ No

n. Does (will) generator retain copies for 3 years?

☒ Yes ☐ No

Section D - Pre-Transport Requirements (262.30-262.34)

☐ N/A

1. Does generator package waste for transport?

☒ Yes ☐ No

If no, skip to question 8.

If yes, complete the following questions.

2. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30 - Packaging)

☒ Yes ☐ No

3. Inspect containers to be shipped.

- a. Are containers to be shipped in good condition?  
(Describe containers and condition; i.e, leaking or corroding or bulging.) ☒ Yes ☐ No
- b. Is there evidence of heat generation from incompatible wastes in the containers? ☐ Yes ☒ No

4. Before shipping, does the generator use DOT labeling requirements in accordance with 49 CFR 172? (263.31 - Labeling) ☒ Yes ☐ No

5. Does the generator mark each package in accordance with 49 CFR 172? (262.32 - Marking) ☒ Yes ☐ No

6. Is each container of 110 gallons or less marked with the following label? (262.32 - Marking) ☒ Yes ☐ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address \_\_\_\_\_

Manifest Document Number \_\_\_\_\_

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet. (262.33 - Placarding)

- a. Does the generator have the appropriate placards to offer the initial transporter? ☒ Yes ☒ No

- b. If no, who provides placards? \_\_\_\_\_

8. Accumulation Time (262.34 - Accumulation Time)

- a. Is facility a permitted storage facility? ☒ Yes ☐ No  
If yes, skip to question #9.

If no, answer rest of question #8.

- b. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) ☒ Yes ☐ No

If no, has the generator been granted a 30-day extension? (262.34(b)) ☐ Yes ☐ No

If yes, explain the unforeseen/uncontrollable circumstances in the narrative.

c. Are containers used to store wastes? (262.34(a)(1))

☒ Yes ☐ No

If yes, complete Container Storage Checklist for Generators.

Is the beginning date of accumulation time clearly indicated? (262.34(a)(2))

☒ Yes ☐ No

d. Are tanks used to store wastes? (262.34(a)(1))

☒ Yes ☐ No

If yes, complete Tanks Checklist for Generators.

e. While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3))

☒ Yes ☐ No

NOTE: If generator accumulates waste on site but is not a storage facility, fill out Appendix A to Generators Checklist.

9. Describe storage area. Use photos and narrative.

Section E - Recordkeeping and Records (262.40-262.43)

N/A

Explain \_\_\_\_\_

1. Is generator keeping the following reports? (262.40 - Record keeping)  
(Note: The following must be kept for a minimum of three years.)

a. Biennial reports (262.41).

☒ Yes ☐ No

b. Exception reports where applicable (262.42).

☒ Yes ☐ No

c. Test results where applicable.

☒ Yes ☐ No

2. Where are records kept (at facility or elsewhere)? AT FACILITY

3. Who is in charge of keeping the records?

Name THOMAS SANDS / GLEN CRUSE Title \_\_\_\_\_

4. Any additional reporting? (262.43 - Additional Reporting)

☐ Yes ☐ No

Section F - Special Condition (262.50 - International Shipments)

N/A ☐ Yes ☐ No

Explain \_\_\_\_\_



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1. Has generator received from, or transported to, a foreign source, any hazardous waste? ☐ Yes ☒ No
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☒ No
- b. Is this waste manifested and signed by Foreign consignee? ☐ Yes ☐ No
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No

## Appendix A

Section A - Personnel Training (265.16)

1. Do management personnel complete hazardous waste training? ☒ Yes ☐ No
- a. Is training on-the-job? ☒ Yes ☐ No
- b. Is training in the classroom? ☒ Yes ☐ No
2. Do laborers who handle hazardous waste complete training? ☒ Yes ☐ No
- a. Is training on-the-job? ☒ Yes ☐ No
- b. Is training in the classroom? ☒ Yes ☐ No
3. Does training include:
- a. Emergency response procedures? ☒ Yes ☐ No
- b. Inspection procedures? ☒ Yes ☐ No
- c. Operation of hazardous waste handling equipment? ☒ Yes ☐ No
4. How often is training reviewed? EVERY SIX MONTHS
5. Does the facility have personnel training records including:
- a. Job title and description of position? ☒ Yes ☐ No
- b. Description of employee's training? ☒ Yes ☐ No
6. Are records maintained for three years? ☒ Yes ☐ No

Section B - Preparedness and Prevention (265.30-265.37)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility) Yes ☒ No

If yes, use narrative explanation.

2. Is the facility equipped with (265.32 - Required equipment)

a. Internal communications or alarm system? ☒ Yes ☐ No  
Is it easily accessible in case of emergency? ☒ Yes ☐ No

b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No

c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ☒ Yes ☐ No  
Is this equipment tested to assure its proper operation? ☒ Yes ☐ No

How frequently? ONCE A YEAR

d. Water of adequate volume for hoses, sprinklers or water spray system? ☒ Yes ☐ No

(1) Describe source of water CITY OF BOYNTON BEACH

(2) Indicate flow rate and/or pressure and storage, if applicable. \_\_\_\_\_

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between containers to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space) ☒ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with Local Authorities) N/A ☒ Yes ☐ No

If N/A, explain \_\_\_\_\_

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities) N/A ☐ Yes ☐ No

If yes, indicate primary authority BOYNTON BEACH FIRE AND POLICE

Is the fire department a city or volunteer fire department? City

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6. Does the owner/operator have phone numbers of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities)

☒ Yes ☐ No

Are they readily available to the emergency coordinator?

☒ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities)

☒ Yes ☐ No

If no, has the owner/operator attempted to do this?

☒ Yes ☐ No

8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operating record? (265.37(b) - Arrangements with Local Authorities)

☒ Yes ☐ No

Section C - Contingency Plan and Emergency Procedures (265.50-265.56)

1. Does the facility have a contingency plan?  
(265.51 - Purpose and Implementation of Contingency Plan)

☒ Yes ☐ No

2. Is it maintained at the facility?  
(265.53 - Copies of Contingency Plan)

☒ Yes ☐ No

3. Is the contingency plan a revised SPCC Plan?  
(265.53 - Content of Contingency Plan)

☐ Yes ☐ No

a. Does the plan include:

- (1) Action personnel will take?  
(2) Evacuation routes?  
(3) Emergency equipment?  
(4) Is the emergency equipment properly inspected and maintained?

☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No  
☒ Yes ☐ No

4. Is there an emergency coordinator on site or within short driving distance of the plant at all times?

☒ Yes ☐ No

5. Who is the emergency coordinator? THOMAS SANDS

6. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53 - Copies of Contingency Plan)

☒ Yes ☐ No

Date 10/9/92  
Inspector GRAY GREGORY HESS  
Facility ID# FLD 784167741

CONTAINERS STORAGE CHECKLIST FOR GENERATORS

(40 CFR Part 265, Subpart I - Use and Management of Containers)

1. Are the containers in good condition (265.171)? (Check for leaks, corrosion, bulges, etc.) ☒ Yes ☐ No
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? ☐ Yes ☐ No **OVERPACKED**
3. Is the waste compatible with the containers and/or its liner (265.172)? ☒ Yes ☐ No
4. Are the containers kept closed except when adding or removing wastes (265.173(a))? ☒ Yes ☐ No
5. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak (265.173(b))? ☐ Yes ☒ No
- If yes, explain using narrative.
6. Are each of the containers inspected at least weekly (265.174)? ☒ Yes ☐ No **DAILY**
- If no, explain using narrative concerning the frequency of inspection.
7. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line (265.176)? ☐ N/A ☒ Yes ☐ No
- If no, explain using narrative and document with photograph.
8. Are incompatible wastes stored in the same containers? ☐ Yes ☒ No
- If yes, explain using narrative.
9. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance (265.177)? ☒ Yes ☐ No
- If no, explain using narrative.

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Date 10/9/97  
Inspector John G. Gentry, PE  
Generator EPA ID# FLD042167791

TANKS SYSTEMS CHECKLIST FOR GENERATORS  
(40 CFR Part 265, Subpart J - Tank Systems)

NOTE: If multiple tanks exist, list each tank and specify compliance or noncompliance on the facility's site plan. Indicate on site diagram which tanks are not in compliance.

1. Are tanks presently used to accumulate waste? ✓Yes   No
2. Are there any exempt tank systems present (Closed-loop Recycling System - 261.4(a)(8))?   Yes ✓No
3. Assessment of the integrity of existing tank systems (265.191):
  - a. Number of existing tank systems without secondary containment (265.193) in operation, or for which installation commenced on or prior to July 14, 1986? - 0 -
  - b. Number of existing tank systems without secondary containment (265.193) in operation, or for which installation commenced on or prior to the date the contained waste became hazardous (after 7/14/86)? - 0 -
  - c. Are assessments on file for each of these tank systems (a & b)? N/A   Yes   No

If yes, do the following apply?

- (1) Assessment conducted by 1/12/88?   Yes   No
- (2) For wastes becoming hazardous after 7/14/86, was assessment on tank containing such waste conducted within 1 year after the date the waste became hazardous?   Yes   No
- (3) Certification(s) by independent, qualified, and registered P.E.(s)?   Yes   No
- (4) Integrity assessment(s) results?  
   not leaking?  
   unfit for use? (see item #8)

Comments:

4. New tank systems or components (265.192):

a. Number of new tank systems or components installed or put into use after 7/14/86? 2

b. Are assessments on file for each of the new tank systems or components? ✓ Yes     No.

If yes, do the following apply:

(1) Assessment(s) certified by an independent, qualified, registered P.E.? ✓ Yes     No

(2) Assessment(s) include the following information:

- Design standards (including secondary containment unless a variance-265.193(g) has been received? ✓ Yes     No
- Factor affecting corrosion potential of tanks or components in which the external shell or any external metal component is in contact with soil or water (determined by a corrosion expert)? ✓ Yes     No
- The type and degree of external corrosion protection that is needed to ensure the integrity of the tank system(s) or components(s) described above (determined by a corrosion expert)? ✓ Yes     No
- A determination of design or operational measures that will protect underground tank system components against potential damage from vehicular traffic? ✓ Yes     No
- Design considerations to ensure that tank foundations will maintain the load of a full tank? ✓ Yes     No
- Tank systems will be anchored to prevent flotation or dislodgement where it is placed in a saturated zone or is located within a seismic fault zone? ✓ Yes     No
- Tank systems will withstand the effects of frost heave? ✓ Yes     No

c. Are certification statements by a qualified installation inspector or qualified registered professional engineer on file to attest:

(1) to proper tank system or component installation, tank system tightness, and that necessary repairs were performed if needed? ✓ Yes     No

- (2) That backfill, used for underground tank systems or components, was made up of noncorrosive, porous and homogeneous materials that were placed properly around the system or component to ensure proper support? N/A Yes No
- (3) That ancillary equipment has been supported and and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction? Yes No
- (4) That the type and degree of corrosion protection necessary was provided, based on the certified design assessment of the system? Yes No
- (5) That an independent corrosion expert ensured the proper installation of a corrosion protection system if it was field-fabricated? Yes No
- d. Has secondary containment been provided as required in 265.193 (see Item #6)? yes
- (1) Has a variance (265.193(g)) been obtained from secondary containment? N/A Yes No

Comments:

5. Containment and detection of releases (265.193).

NOTE: Tank systems storing hazardous waste that contain no free liquids and are located within buildings with impermeable floors are exempt from these requirements (265.190(a)).

- a. How old are the existing tank systems? 1 year
- (1) If not known, what is the age of the facility?
- b. How many existing systems are being used to store or treat dioxin containing wastes: F020, F021, F022, F023, F026, and F027? -0-
- c. Are there any existing tank systems which are used to store or treat materials which became hazardous wastes after 1/12/87? Yes ✓No
- (1) How many?

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- d. Use the guidelines in 265.193(a)(1)-(5) to determine when secondary containment meeting the requirement of 265.193 is to be provided (use narrative explanation sheet if necessary). N/A
- e. Have any variances (265.193(g)) from secondary containment been requested for existing tank systems? \_\_\_Yes \_\_\_No
- f. Are leak tests meeting the requirements of 265.191(b)(5) conducted annually for non-enterable underground tanks without secondary containment? \_\_\_Yes \_\_\_No
- g. Are leak tests as described above, or internal inspections or other tank integrity examinations done by an independent, qualified, registered P.E. annually for all other types of tanks systems and ancillary equipment? \_\_\_Yes \_\_\_No
- h. Are records of the results of leak tests or other tank integrity assessments kept on file? \_\_\_Yes \_\_\_No
- i. Were any tank systems or components found to be leaking or unfit for use as a result of leak tests or other assessments?

NOTE: If the answer is yes, refer to item #8 - Response to leaks or spills and disposition of leaking or unfit-for-use tank systems (265.196).

Comments:

6. Secondary containment systems (265.193(b)-(f)).

- a. Has secondary containment been provided for any tank system or component (see Items 4.d., 5.d, and 9.f)? ✓ \_\_\_Yes \_\_\_No
- b. If yes, has the containment system been:
- (1) Designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface water at any time during its use? ✓ \_\_\_Yes \_\_\_No
- (2) Capable of detecting and collecting releases and accumulated liquids until the collected material is removed? ✓ \_\_\_Yes \_\_\_No



c. To satisfy b., has the containment system been:

- (1) Constructed of or lined with materials that are compatible with the waste(s) to be contained? ☒ Yes ☐ No
- (2) Provided with sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with waste it is exposed to, climatic conditions, the stress of installation, and the stress of daily operations including vehicular traffic? ☒ Yes ☐ No
- (3) Placed on a foundation or base capable of providing support to the system, resistance to pressure gradients above and below, and protection against failure due to settlement, compression or uplift? ☒ Yes ☐ No
- (4) Provided with a leak detection system that is designed and operated so that it will detect the failure of either the primary and secondary containment structure or any release of waste or accumulated liquid into the secondary containment system within 24 hours or at the earliest practicable time based on existing leak detection technology and site conditions? ☒ Yes ☐ No
- (5) Sloped or otherwise designed or operated to drain or remove liquids resulting from leaks, spills, or precipitation? ☒ Yes ☐ No

d. Which device below is used to provide secondary containment for tanks? (Check those that apply.)

- ☐ (1) A liner (external to the tank)
- ☒ (2) A vault
- ☐ (3) A double-walled tank
- ☐ (4) An equivalent device approved by the Department.

e. If an external liner system is used, has it been: N/A

- (1) Designed or operated to contain 100% of the capacity of the largest tank within its boundary? ☐ Yes ☐ No
- (2) Designed or operated to prevent run-on or infiltration of precipitation into the system? ☐ Yes ☐ No

NOTE: If the containment collection system has sufficient excess capacity - able to contain precipitation from a 25-year, 24-hour rainfall event - this feature is not necessary.

- (3) Determined to be free of cracks and gaps? ☐ Yes ☐ No
- (4) Designed and installed to completely surround the tank and to cover all surrounding earth to prevent lateral and vertical migration of waste? ☐ Yes ☐ No
- f. If a vault system is used, has it been:
- (1) Designed or operated to contain 100% of the capacity of the largest tank within its boundary? ☒ Yes ☐ No
- (2) Designed or operated to prevent run-on or infiltration of precipitation into the system (see note above)? ☒ Yes ☐ No
- (3) Constructed with chemical-resistant water stops in place at all joints (if any)? ☒ Yes ☐ No
- (4) Provided with an impermeable interior coating or lining that is compatible with the accumulated waste to prevent migration into the concrete? ☒ Yes ☐ No
- (5) Provided with protection against the formation and ignition of vapors within the vault if the wastes being accumulated are ignitable or reactive? ☒ Yes ☐ No
- (6) Provided with an exterior moisture barrier or otherwise designed or operated to prevent migration of moisture into the vault (if it is subject to hydraulic pressure)? ☒ Yes ☐ No
- g. If double-walled tanks are used, are they: N/A
- (1) Designed as an integral structure so that the outer shell will contain releases from the inner tank? ☐ Yes ☐ No
- (2) Protected, if constructed of metal, from corrosion on the inner tank interior and outer shell exterior? ☐ Yes ☐ No
- (3) Provided with a built-in, continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time based on existing technology and site conditions? ☐ Yes ☐ No

Comments:

7. General operating requirements (265.194).

- a. Is there any evidence of ruptures, leaks, corrosion, or failure in the tank system or ancillary equipment? Yes ☒ No

NOTE: If the answer is yes, explain in the narrative report.

- b. Are appropriate controls and practices such as the following used to prevent spills and overflows from tanks or secondary containment systems:

(1) Spill prevention controls (e.g., check valves, dry discount couplings, etc.)? ☒ Yes      No

(2) Overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank)? ☒ Yes      No

(3) Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave, wind action, or precipitation? ☒ Yes      No

- c. Have any leaks or spills occurred in a tank system or its ancillary equipment? Yes ☒ No

NOTE: If the answer is yes, explain what steps were taken in response to this situation in the narrative report (see item #8 - 265.196).

Comments:

8. Inspections (265.195).

- a. Does the owner/operator inspect the following, each operating day, where present:

(1) Overfill/spill control equipment (e.g. waste-feed cutoff systems, bypass systems, and drainage systems)? ☒ Yes      No

(2) Aboveground portions of the tank system to detect corrosion or releases of waste? ☒ Yes      No

(3) Data gathered from monitoring equipment and leak detection equipment (e.g. pressure and temperature gauges, monitoring wells)? ☒ Yes      No

- (4) The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g. dikes) to detect erosion or signs of releases of hazardous waste (e.g. wet spots, dead vegetation)?

☒ Yes ☐ No

- b. Are cathodic protection systems, if present, inspected according to the following schedule:

- (1) Six months to confirm the proper operation of the cathodic protection system after the initial installation, and annually thereafter?

☐ Yes ☐ No

- (2) Every other month to inspect sources of impressed current?

☐ Yes ☐ No

- c. Are the inspection results documented in the operating record of the facility?

*yes*

Comments:

9. Response to leaks or spills and disposition of leaking or unfit-for-use tank systems (265.196).

- a. If a tank or secondary containment system has a leak or a spill has occurred, was the system immediately removed from service and the flow of hazardous waste into the system immediately stopped?

☒ Yes ☐ No

- (1) If the release was from the tank system, was as much of the waste as necessary removed within 24 hours or at the earliest practicable time after its detection to allow inspection and repair to be performed?

☒ Yes ☐ No

- (2) If the release was to the secondary containment system, were all released materials removed within 24 hours or in as timely a manner as possible to prevent harm to human health and the environment?

☒ Yes ☐ No

- b. If there was a visible release to the environment, was a visual inspection conducted by the owner/operator?

*N/A* ☐ Yes ☐ No

- (1) Was further migration of the leak or spill to soils or surface water prevented?

☐ Yes ☐ No

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- (2) Was the visible contamination removed and properly disposed of?

\_\_\_Yes \_\_\_No

- c. Was the release to the environment reported to the Department within 24 hours of detection?

\_\_\_Yes \_\_\_No

NOTE: A leak or spill of less than or equal to a quantity of one pound of hazardous waste and that is immediately contained and cleaned up is exempted from this requirement.

- d. Was a report to the Department, as specified in 265.196(d)(3), submitted within 30 days for nonexempt releases?

\_\_\_Yes \_\_\_No

- e. If a leak was the cause of a release, was the system repaired before being returned to service?

\_\_\_Yes \_\_\_No

- f. If the leak caused a release to the environment from a component of a tank system without secondary containment, was that component provided with secondary containment as specified in 265.193 before it was returned to service (see Item #6)?

\_\_\_Yes \_\_\_No

NOTE: If the leaking component is aboveground and can be inspected visually, secondary containment does not need to be provided after repair.

\*\*\*: If a component was replaced in order to repair the system, the owner or operator must comply with the standards for new tank systems or components 265.192 and 265.193 (see item #4).

- g. Was a major repair performed to return the tank system back to service?

\_\_\_Yes \_\_\_No

- (1) If yes, was a certification of this major repair done by an independent, qualified, registered P.E. before the system was returned to service?

\_\_\_Yes \_\_\_No

- (2) Was this certification submitted to the department within 7 days after returning the system to service?

\_\_\_Yes \_\_\_No

Comments:

10. Closure and post-closure care (265.197).

- a. At closure of a tank system, did the owner/operator remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste? N/A Yes No

Comments:

11. Special requirements for ignitable or reactive wastes (265.198).

- a. Are ignitable or reactive wastes placed in tanks? Yes No

(1) If yes, are they treated, rendered, or mixed before or immediately after placement in the tank system so that:

- The resulting waste, mixture, or dissolved material no longer meet the definition of ignitable or reactive waste and 265.17(b) is complied with? Yes No

OR

- The waste is stored or treated in such a way that is protected from any material or conditions that may cause the waste to ignite or react? Yes No

NOTE: If yes, use narrative explanation sheet to describe separation and confinement procedures. If no, use narrative explanation sheet to describe sources of ignition or reaction.

- OR - The tank system is used solely for emergencies? Yes No

- b. Are protective distances maintained between the tank accumulation areas and any public ways, streets, alleys, or adjoining property lines that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? Yes No

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12. Special requirements for incompatible wastes (265.199).

- a. Is there evidence that incompatible wastes were in the same tank?

\_\_\_ Yes \_\_\_ ☒ No

NOTE: If yes, use narrative explanation sheet to state the results (e.g. signs such as fire, toxic mists, heat generation, bulging containers, etc.) and whether 265.17(b) was complied with.

- b. If a waste is to be placed in a tank that previously held an incompatible waste or material, was that tank washed?

\_\_\_ Yes \_\_\_ No

NOTE: If yes, describe the washing procedure on the narrative explanation sheet. If no, was 265.17(b) complied with?

Comments:

Date 10/9/92  
Inspector GRAY GREGORY HESS  
Facility ID# FAI 9341671741

TRANSPORTERS CHECKLIST

I. SITE NAME: SAFETY-KLEEN / DOWNTON BEACH

II. TRANSPORTER REQUIREMENTS (40 CFR 263)

1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500) ☒ Yes ☐ No
2. Does transporter have an EPA identification number? (263.11(a)) ☒ Yes ☐ No
3. Does the transporter use manifest system as required by 263.20? ☒ Yes ☐ No

Do the manifests contain at least:

- a. Name, address, and EPA ID of transporter? ☒ Yes ☐ No
- b. Name, address, and EPA ID code of generator? ☒ Yes ☐ No
- c. Name, address, identification code of designated permitted facility? ☒ Yes ☐ No
- d. Corresponding manifest document number? ☒ Yes ☐ No
- e. Description and quantity of each hazardous waste? ☒ Yes ☐ No
- f. Signature of subsequent transporters? ☒ Yes ☐ No
- g. Signatures signifying proper delivery or reasons why delivery could not be certified? ☒ Yes ☐ No
- h. EPA waste codes? ☒ Yes ☐ No



4. International shipments: (263.20(g))

a. Record of date waste left U.S.?

b. Presence of one signed copy in records?

c. Signed copy of manifest returned to the generator?

d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States?

5. For SQG waste:

a. Is waste transported according to reclamation agreement?

b. Is following information recorded on a shipping paper:

Name, address, and EPA ID of waste generator  
Quantity of waste accepted  
DOT - required shipping info  
Date waste is accepted

c. Does transporter carry this shipping paper during transport?

d. Are records maintained for three years after termination or expiration of reclamation agreement?

6. Are copies of the manifest retained for 3 years? (263.22)

7. Is there evidence of discharge of hazardous waste? (263.30)

8. Has transporter demonstrated the financial responsibility required under 17-30.170(2)

9. Does the transporter verify financial responsibility with the Department annually (17-730.170(3))?

III. TRANSFER FACILITY REQUIREMENTS (17-730.171)

A. Does transporter comply with 10 day storage limit for transfer facilities? (263.12)

1. Is the hazardous waste packaged according to 262.30? (263.12)

B. General Facility Standards (265 Subpart B)

1. Security (265.14)

- a. Is the facility security system adequate to minimize unauthorized entry? ☒ Yes ☐ No
- b. Are signs posted and legible for 25 feet? ☒ Yes ☐ No

2. Inspection Requirement (265.15)

- a. Does the facility have a copy of the Inspection Plan? ☒ Yes ☐ No
- b. Does the facility have completed inspection logs? ☒ Yes ☐ No
- c. Were the deficiencies corrected in a timely manner? ☒ Yes ☐ No
- d. Are the inspection logs maintained at the facility for 3 years? ☒ Yes ☐ No

3. Personnel Training (265.16)

- a. Do management personnel complete hazardous waste training? ☒ Yes ☐ No
- Is training on the job? ☒ Yes ☐ No
- Is training in the classroom? ☒ Yes ☐ No
- b. Do laborers who handle hazardous waste complete training? ☒ Yes ☐ No
- Is training on the job? ☒ Yes ☐ No
- Is training in the classroom? ☒ Yes ☐ No
- c. Does training include:
- Emergency response procedures? ☒ Yes ☐ No
- Inspection procedures? ☒ Yes ☐ No
- Operation of hazardous waste handling equipment? ☒ Yes ☐ No
- d. How often is training reviewed? Every 6 months
- e. Does the facility have personnel training records including:
- Job title and description of position? ☒ Yes ☐ No
- Description of employee's training ☒ Yes ☐ No

- f. Is training successfully completed within 6 months of hiring/transfer to HW position? ☒ Yes ☐ No
- g. Are records maintained for three years at the facility? ☒ Yes ☐ No

4. Ignitable, Reactive, or Incompatible Waste (265.17)

- a. Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? ☒ Yes ☐ No
- b. Are "No Smoking" signs posted in the area? ☒ Yes ☐ No

C. Preparedness and Prevention (265 Subpart C)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility) ☐ Yes ☒ No

If yes, use narrative explanation.

2. Is the facility equipped with (265.32 - required equipment):

- a. Internal communications or alarm system? ☒ Yes ☐ No  
Is it easily accessible in case of emergency? ☒ Yes ☐ No
- b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No

- c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ☒ Yes ☐ No

Is this equipment tested to assure its proper operation?

☒ Yes ☐ No

How frequently? weekly

- d. Water of adequate volume for hoses, sprinklers or water spray system?

☒ Yes ☐ No

(1) Describe source of water. City of Brighton Beach

(2) Indicate flow rate and/or pressure and storage capacity, if applicable. \_\_\_\_\_

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3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space) ☒ Yes ☐ No
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with Local Authorities) ☐ N/A ☒ Yes ☐ No
- If N/A, explain \_\_\_\_\_
5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities) ☐ N/A ☒ Yes ☐ No
- If yes, indicate primary authority. Baytown Bld
- Is the fire department a city or volunteer fire department? city
6. Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities) ☒ Yes ☐ No
- Are they readily available to the emergency coordinator? ☒ Yes ☐ No
7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities) ☒ Yes ☐ No
- If no, has the owner/operator attempted to do this? N/A
8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37 - Arrangements with Local Authorities) ☐ Yes ☒ No

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## C. Contingency Plan and Emergency Procedures (265 Subpart D)

1. Does the facility have a contingency plan?  
(265.51 - Purpose and Implementation of Contingency Plan) ☒ Yes ☐ No
2. Is it maintained at the facility?  
(265.53 - Copies of Contingency Plan) ☒ Yes ☐ No
3. Is the contingency plan a revised SPCC Plan  
(265.52 - Content of Contingency Plan) ☒ Yes ☐ No
  - a. Does the plan include:
    - (1) Action personnel will take? ☒ Yes ☐ No
    - (2) Evacuation routes? ☒ Yes ☐ No
    - (3) Emergency Equipment? ☒ Yes ☐ No
    - (4) Is the emergency equipment properly inspected and maintained? ☒ Yes ☐ No
4. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator) ☒ Yes ☐ No
5. Who is the emergency coordinator? Thomas Sands
6. Has the facility supplied local police and fire departments with a copy of the contingency plan?  
(265.53(b) - Content of Contingency Plan) ☒ Yes ☐ No

## D. Container Storage Checklist

(Subpart I - Use and Management of Containers 265.170)

1. Are the containers in good condition (265.171)?  
(check for leaks, corrosion, bulges, etc.) ☒ Yes ☐ No
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? ☒ Yes ☐ No
3. Is the waste compatible with the containers and/or its liner? (265.172) ☒ Yes ☐ No

4. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173) Yes ☒ No

If yes, explain using narrative.

5. Are each of the containers inspected at least weekly (265.174)? ☒ Yes No

If no, explain using narrative concerning the frequency of inspection.

6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176) ☒ Yes No

If yes, explain using narrative.

7. Are incompatible wastes stored in the same containers? Yes ☒ No

If yes, explain using narrative.

8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? ☒ Yes No

If no, explain using narrative.

- E. Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112(c), 265.114, 265.115? (17-30.171(2)(b)) ☒ Yes No

- F. Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground? (17-730.171(2)(d)) ☒ Yes No

- G. Is a written log maintained for all waste entering or leaving the transfer facility? (17-730.171(2)(e)) Yes ☒ No

Does the log contain:

- Generators' names? ☒ Yes No  
Manifest numbers? ☒ Yes No  
Dates when waste enters and leaves facility? ☒ Yes No

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H. Has the facility notified the department on Form 17-730.900(6) (Transfer facility notification form)? (17-730.171(3))

☒ Yes ☐ No

I. Does the transfer facility have an EPA/DER ID number?

☒ Yes ☐ No

IV. UNREGULATED WASTES (HOUSEHOLD/CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR WASTES)

☐ N/A

1. Does the transporter have documentation that this waste was generated by an unregulated source?

☒ Yes ☐ No

2. If no, is the transporter assuming responsibility as the generator of this waste?

☐ Yes ☐ No

a. If yes, complete the applicable Generator or Small Quantity Generator checklist.

b. If no, the inspector should inform the transporter that he will be held responsible as the generator of the waste and will be reinspected to ensure that the applicable requirements are being satisfied. A follow-up inspection should be scheduled as follows:

i) 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed 1000 kg.

ii) 180 days after initial inspection if the quantity of "unregulated" wastes on site are less than 1000 kg.

3. Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)?

☒ Yes ☐ No

If yes, complete the Generator checklist.

V. LAND BAN WASTE

1. Does the transporter manage restricted (land ban) wastes?

If yes, check appropriate box(es).

☒ Yes ☐ No

"California List" ☒

F--- List ☒

Date 10/9/92  
Inspector GRAY, GREGORY, HESS  
Facility ID# FLD 987167797

RCRA COMPLIANCE INSPECTION REPORT  
TSD FACILITIES CHECKLIST

General Facility Standards

1. Site Name SAFETY - KIEEL / BOYNTON BEACH
2. Has facility received hazardous waste from a foreign source? (264.12 - required notices) Yes ☒ No
- If yes, has he filed a notice with the Regional Administrator and DER? N/A Yes No
3. Does the facility have a copy of the permit along with the approved application? Yes No

Waste Analysis (264.13) 264      Permit Condition     

1. Is a copy of the waste analysis plan maintained at the facility? ☒ Yes No
2. Does the facility have copies of completed waste analysis reports? ☒ Yes No
3. Has the waste analysis been reviewed or repeated as required? ☒ Yes No
4. (For off-site facilities) waste analysis that generators have agreed to supply? Yes No
5. Check waste analysis equipment to see if it is on-site and in working condition? Yes No

Security (264.14) 264      Permit Condition     

1. Is the facility security system adequate to minimize unauthorized entry? ☒ Yes No
2. Are signs posted and legible for 25 feet? ☒ Yes No

Inspection Requirement (264.15) 264      Permit Condition     

1. Does the facility have a copy of the Inspection Plan? ☒ Yes No



2. Does the facility have completed inspection logs? ☒ Yes ☐ No
3. Were the deficiencies corrected in a timely manner? ☒ Yes ☐ No
4. Are the inspection logs maintained at the facility for 3 years? ☒ Yes ☐ No
5. Is the facility equipped to prevent fire, explosion or contamination of the environment and is the equipment in working condition? ☒ Yes ☐ No

Personnel Training (264.16) 264\_\_\_\_ Permit Condition\_\_\_\_

1. Does facility have copy of training plan? ☒ Yes ☐ No
2. Does facility have personnel training records? ☒ Yes ☐ No
3. Has management completed training? ☒ Yes ☐ No
4. Have laborers completed training? ☒ Yes ☐ No
5. Is training successfully completed within 6 months of hiring/transfer to HW position? ☒ Yes ☐ No
6. Has the training been conducted as stated in the Training Plan? ☒ Yes ☐ No
7. Do the facility personnel training records include:
- a. Job title and description of position? ☒ Yes ☐ No
- b. Description of employee's training? ☒ Yes ☐ No
8. Are records maintained for 3 years? ☒ Yes ☐ No

Ignitable, Reactive, or Incompatible Waste (264.17) 264\_\_\_\_ Permit Condition\_\_\_\_

1. Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? ☒ Yes ☐ No
2. Are "No Smoking" signs posted in the area? ☒ Yes ☐ No

Preparedness and Prevention (264.30-.37) 264\_\_ Permit Condition\_\_

1. Is there evidence of fire, explosion or contamination of the environment? Yes ☒ No
2. Is the facility equipment located in accordance with the approved plan and is it functional? ☒ Yes No

Contingency Plan and Emergency Procedures (264.50-56) 264\_\_ Permit Condition\_\_

1. Does the facility have a copy of the Contingency Plan? ☒ Yes No
2. Has the plan been amended and have the amendments been approved? ☒ Yes No
3. Were the plan revisions submitted to all authorities? ☒ Yes No
4. Is the emergency coordinator on-site or within short driving distance of plant at all times? ☒ Yes No
5. Verify equipment location. Is it in working condition? ☒ Yes No

Manifest System, Recordkeeping and Report (264.70-77) 264\_\_ Permit Condition\_\_

1. Does the facility have copies of the Manifest?  
☒ Yes No
  - a. Are the manifests signed and dated and returned to the generator? ☒ Yes No
  - b. Is a signed copy given to the transporter? ☒ Yes No
  - c. Are there any manifests that have not been completely filled out? ☒ Yes No
2. Are copies of the manifest retained for three years? ☒ Yes No
3. Has the facility received any shipments of hazardous waste which were inconsistent with the manifest? ☒ Yes No

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a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?

\_\_\_ Yes \_\_\_ No

b. If no, has DER been notified?

\_\_\_ Yes \_\_\_ No

4. Does the facility have operating records that show a description and quantity of each hazardous waste and the date and method of T,S,D at the facility?

\_\_\_ Yes \_\_\_ No

5. Does location and quantity of hazardous waste agree with operating record?

\_\_\_ Yes \_\_\_ No

Groundwater Monitoring (264.90-.100) 264\_\_\_ Permit Condition\_\_\_

1. Does the facility have a copy of the Groundwater Plan?

✓ \_\_\_ Yes \_\_\_ No

2. Does the facility have copies of the groundwater analysis?

✓ \_\_\_ Yes \_\_\_ No

3. Has the analysis been conducted as specified?

\_\_\_ Yes \_\_\_ No

4. Has there been a statistically significant increase of the value for the parameter from background?

\_\_\_ Yes \_\_\_ No

5. Did the facility notify the Department of the parameter that showed a statistically significant increase within 7 days?

\_\_\_ Yes \_\_\_ No

6. Verify location of wells?

\_\_\_ Yes \_\_\_ No

7. Verify condition of wells and check for caps and locks?

\_\_\_ Yes \_\_\_ No

Closure and Post-Closure (264.110-.120) 264\_\_\_ Permit Condition\_\_\_

1. Is a copy of the approved plan and all revisions kept at the facility?

✓ \_\_\_ Yes \_\_\_ No

2. Does the maximum inventory of wastes at the facility exceed that specified in the Closure Plan?

\_\_\_ Yes ✓ \_\_\_ No

3. Does the facility have an approved post-closure plan (for land disposal facilities)?

✓ \_\_\_ Yes \_\_\_ No

4. Has the plan been amended and approved by the Department and distributed to the appropriate agencies?

☒ Yes ☐ No

Financial (264.140-.151) 264 Permit Condition

1. Does the facility have a written estimate, in current dollars, of the cost of closing the facility?

☒ Yes ☐ No

2. Has the financial assurance been updated for the last year?

☒ Yes ☐ No

3. Is the facility in compliance with the financial assurance regulation with respect to:

Closure cost?

☒ Yes ☐ No

Post-closure cost?

☐ N/A ☒ Yes ☐ No

Sudden liability?

☒ Yes ☐ No

Non-sudden liability?

☐ N/A ☒ Yes ☐ No

Date 10/9/93  
Inspector CRAY, GREGORY HESS  
Facility ID# \_\_\_\_\_

TSD CONTAINERS CHECKLIST (264.170-264.178)

264 \_\_\_\_\_ Permit Condition ✓

1. Are the containers in good condition (264.171)? ✓ Yes \_\_\_ No
2. Are the containers managed in accordance with the permit (264.171)? ✓ Yes \_\_\_ No
3. Is the number of containers equal to or below the max inventory for the permit? ✓ Yes \_\_\_ No
4. Are the containers in the designated bays by waste type? ✓ Yes \_\_\_ No
5. Is the waste stored in the specified container? ✓ Yes \_\_\_ No
6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak (264.173(b))? \_\_\_ Yes ✓ No

Explain.

7. Are each of the containers inspected at least weekly (264.174)? ✓ Yes DAIRY \_\_\_ No
8. Is the secondary containment system functional and are free liquids removed and managed in accordance with the permit? ✓ Yes \_\_\_ No
9. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? ✓ Yes \_\_\_ No
10. Is there sufficient aisle space to allow unobstructed movement and inspection? ✓ Yes \_\_\_ No

11. Specific Condition on Permit:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_ Yes \_\_\_ No  
\_\_\_ Yes \_\_\_ No  
\_\_\_ Yes \_\_\_ No

Date 10/9/92  
Inspector GRAY GREGORY HESS  
Generator EPA ID# FD 8416779

TSD TANKS CHECKLIST  
(40 CFR Part 264, Subpart J - Tank Systems)

NOTE: If multiple tanks exist, list each tank and specify compliance or noncompliance on the facility's site plan. Indicate on site diagram which tanks are not in compliance.

1. Are tanks presently used to accumulate waste? ☒ Yes ☐ No
2. Are there any exempt tank systems present (Closed-loop Recycling System - 261.4(a)(8))? ☐ Yes ☒ No
3. Assessment of the integrity of existing tank systems (264.191):
  - a. Number of existing tank systems without secondary containment (264.193) in operation, or for which installation commenced on or prior to July 14, 1986? \_\_\_\_\_
  - b. Number of existing tank systems without secondary containment (264.193) in operation, or for which installation commenced on or prior to the date the contained waste became hazardous (after 7/14/86)? \_\_\_\_\_
  - c. Are assessments on file for each of these tank systems (a & b)? ☒ Yes ☐ No

If yes, do the following apply?

- (1) Assessment conducted by 1/12/88? ☒ Yes ☐ No
- (2) For wastes becoming hazardous after 7/14/86, was assessment on tank containing such waste conducted within 1 year after the date the waste became hazardous? ☒ Yes ☐ No
- (3) Certification(s) by independent, qualified, and registered P.E.(s)? ☒ Yes ☐ No
- (4) Integrity assessment(s) results?  
☐ not leaking?  
☐ unfit for use? (see item #8)

Comments:

4. New tank systems or components (264.192):

- a. Number of new tank systems or components installed or put into use after 7/14/86? 5
- b. Are assessments on file for each of the new tank systems or components? ✓ Yes     No

If yes, do the following apply:

- (1) Assessment(s) certified by an independent, qualified, registered P.E.? ✓ Yes     No
- (2) Assessment(s) include the following information:
- Design standards (including secondary containment unless a variance-264.193(g) has been received)? ✓ Yes     No
  - Factor affecting corrosion potential of tanks or components in which the external shell or any external metal component is in contact with soil or water (determined by a corrosion expert)? ✓ Yes     No
  - The type and degree of external corrosion protection that is needed to ensure the integrity of the tank system(s) or components(s) described above (determined by a corrosion expert)? ✓ Yes     No
  - A determination of design or operational measures that will protect underground tank system components against potential damage from vehicular traffic? ✓ Yes     No
  - Design considerations to ensure that tank foundations will maintain the load of a full tank? ✓ Yes     No
  - Tank systems will be anchored to prevent flotation or dislodgement where it is placed in a saturated zone or is located within a seismic fault zone? ✓ Yes     No
  - Tank systems will withstand the effects of frost heave? ✓ Yes     No
- c. Are certification statements by a qualified installation inspector or qualified registered professional engineer on file to attest:
- (1) to proper tank system or component installation, tank system tightness, and that necessary repairs were performed if needed? ✓ Yes     No

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(2) That backfill, used for underground tank systems or components, was made up of noncorrosive, porous and homogeneous materials that were placed properly around the system or component to ensure proper support? N/A \_\_\_Yes \_\_\_No

(3) That ancillary equipment has been supported and and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction? \_\_\_Yes \_\_\_No

(4) That the type and degree of corrosion protection necessary was provided, based on the certified design assessment of the system? \_\_\_Yes \_\_\_No

(5) That an independent corrosion expert ensured the proper installation of a corrosion protection system if it was field-fabricated? \_\_\_Yes \_\_\_No

d. Has secondary containment been provided as required in 264.193 (see Item #6)?

(1) Has a variance (264.193(g)) been obtained from secondary containment? yes \_\_\_Yes \_\_\_No

Comments:

5. Containment and detection of releases (264.193).

NOTE: Tank systems storing hazardous waste that contain no free liquids and are located within buildings with impermeable floors are exempt from these requirements (264.190(a)).

EXEMPT

a. How old are the existing tank systems? \_\_\_

(1) If not known, what is the age of the facility? \_\_\_

b. How many existing systems are being used to store or treat dioxin containing wastes: F020, F021, F022, F023, F026, and F027? \_\_\_

c. Are there any existing tank systems which are used to store or treat materials which became hazardous wastes after 1/12/87? \_\_\_Yes \_\_\_No

(1) How many? \_\_\_



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- d. Use the guidelines in 264.193(a)(1)-(5) to determine when secondary containment meeting the requirement of 264.193 is to be provided (use narrative explanation sheet if necessary).
- e. Have any variances (264.193(g)) from secondary containment been requested for existing tank systems? ☐ Yes ☐ No
- f. Are leak tests meeting the requirements of 264.191(b)(5) conducted annually for non-enterable underground tanks without secondary containment? ☐ Yes ☐ No
- g. Are leak tests as described above, or internal inspections or other tank integrity examinations done by an independent, qualified, registered P.E. annually for all other types of tanks systems and ancillary equipment? ☐ Yes ☐ No
- h. Are records of the results of leak tests or other tank integrity assessments kept on file? ☐ Yes ☐ No
- i. Were any tank systems or components found to be leaking or unfit for use as a result of leak tests or other assessments?

NOTE: If the answer is yes, refer to item #8 - Response to leaks or spills and disposition of leaking or unfit-for-use tank systems (264.196).

Comments:

6. Secondary containment systems (264.193(b)-(f)).

- a. Has secondary containment been provided for any tank system or component (see Items 4.d., 5.d., and 9.f)? ☒ Yes ☐ No
- b. If yes, has the containment system been:
- (1) Designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface water at any time during its use? ☒ Yes ☐ No
- (2) Capable of detecting and collecting releases and accumulated liquids until the collected material is removed? ☒ Yes ☐ No

c. To satisfy b., has the containment system been:

- (1) Constructed of or lined with materials that are compatible with the waste(s) to be contained? ☒ Yes ☐ No
- (2) Provided with sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with waste it is exposed to, climatic conditions, the stress of installation, and the stress of daily operations including vehicular traffic? ☒ Yes ☐ No
- (3) Placed on a foundation or base capable of providing support to the system, resistance to pressure gradients above and below, and protection against failure due to settlement, compression or uplift? ☒ Yes ☐ No
- (4) Provided with a leak detection system that is designed and operated so that it will detect the failure of either the primary and secondary containment structure or any release of waste or accumulated liquid into the secondary containment system within 24 hours or at the earliest practicable time based on existing leak detection technology and site conditions? ☒ Yes ☐ No
- (5) Sloped or otherwise designed or operated to drain or remove liquids resulting from leaks, spills, or precipitation? ☒ Yes ☐ No

d. Which device below is used to provide secondary containment for tanks? (Check those that apply.)

- ☐ (1) A liner (external to the tank)
- ☒ (2) A vault
- ☐ (3) A double-walled tank
- ☐ (4) An equivalent device approved by the Department.

e. If an external liner system is used, has it been:

- (1) Designed or operated to contain 100% of the capacity of the largest tank within its boundary? ☐ Yes ☐ No
- (2) Designed or operated to prevent run-on or infiltration of precipitation into the system? ☐ Yes ☐ No

NOTE: If the containment collection system has sufficient excess capacity - able to contain precipitation from a 25-year, 24-hour rainfall event - this feature is not necessary.

- (3) Determined to be free of cracks and gaps? ☐ Yes ☐ No
- (4) Designed and installed to completely surround the tank and to cover all surrounding earth to prevent lateral and vertical migration of waste? ☐ Yes ☐ No

f. If a vault system is used, has it been:

- (1) Designed or operated to contain 100% of the capacity of the largest tank within its boundary? ☒ Yes ☐ No
- (2) Designed or operated to prevent run-on or infiltration of precipitation into the system (see note above)? ☒ Yes ☐ No
- (3) Constructed with chemical-resistant water stops in place at all joints (if any)? ☒ Yes ☐ No
- (4) Provided with an impermeable interior coating or lining that is compatible with the accumulated waste to prevent migration into the concrete? ☒ Yes ☐ No
- (5) Provided with protection against the formation and ignition of vapors within the vault if the wastes being accumulated are ignitable or reactive? ☒ Yes ☐ No
- (6) Provided with an exterior moisture barrier or otherwise designed or operated to prevent migration of moisture into the vault (if it is subject to hydraulic pressure)? ☒ Yes ☐ No

g. If double-walled tanks are used, are they:

- (1) Designed as an integral structure so that the outer shell will contain releases from the inner tank? ☐ Yes ☐ No
- (2) Protected, if constructed of metal, from corrosion on the inner tank interior and outer shell exterior? ☐ Yes ☐ No
- (3) Provided with a built-in, continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time based on existing technology and site conditions? ☐ Yes ☐ No

Comments:

7. General operating requirements (264.194).

- a. Is there any evidence of ruptures, leaks, corrosion, or failure in the tank system or ancillary equipment? Yes ☒ No

NOTE: If the answer is yes, explain in the narrative report.

- b. Are appropriate controls and practices such as the following used to prevent spills and overflows from tanks or secondary containment systems:

- (1) Spill prevention controls (e.g., check valves, dry discount couplings, etc.)? Yes ☒ No
- (2) Overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank)? Yes ☒ No
- (3) Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave, wind action, or precipitation? Yes ☒ No

- c. Have any leaks or spills occurred in a tank system or its ancillary equipment? Yes ☒ No

NOTE: If the answer is yes, explain what steps were taken in response to this situation in the narrative report (see item #8 - 264.196).

Comments:

8. Inspections (264.195).

- a. Does the owner/operator follow a schedule and procedure for inspecting overfill controls? Yes ☒ No
- b. Does the owner/operator inspect the following, each operating day, where present:
- (1) Aboveground portions of the tank system to detect corrosion or releases of waste? Yes ☒ No
- (2) Data gathered from monitoring equipment and leak detection equipment (e.g. pressure and temperature guages, monitoring wells)? Yes ☒ No

- (3) The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g. dikes) to detect erosion or signs of releases of hazardous waste (e.g. wet spots, dead vegetation)?

☒ Yes ☐ No

- b. Are cathodic protection systems, if present, inspected according to the following schedule:

- (1) Six months to confirm the proper operation of the cathodic protection system after the initial installation, and annually thereafter?

☐ Yes ☐ No

- (2) Every other month to inspect sources of impressed current?

☐ Yes ☐ No

- c. Are the inspection results documented in the operating record of the facility?

Comments:

9. Response to leaks or spills and disposition of leaking or unfit-for-use tank systems (264.196).

- a. If a tank or secondary containment system has a leak or a spill has occurred, was the system immediately removed from service and the flow of hazardous waste into the system immediately stopped?

☒ Yes ☐ No

- (1) If the release was from the tank system, was as much of the waste as necessary removed within 24 hours or at the earliest practicable time after its detection to allow inspection and repair to be performed?

☐ Yes ☐ No

- (2) If the release was to the secondary containment system, were all released materials removed within 24 hours or in as timely a manner as possible to prevent harm to human health and the environment?

☐ Yes ☐ No

- b. If there was a visible release to the environment, was a visual inspection conducted by the owner/operator?

☐ Yes ☐ No

- (1) Was further migration of the leak or spill to soils or surface water prevented?

☐ Yes ☐ No

*N/A since last inspection*

(2) Was the visible contamination removed and properly disposed of?

☐ Yes ☐ No

c. Was the release to the environment reported to the Department within 24 hours of detection?

☐ Yes ☐ No

NOTE: A leak or spill of less than or equal to a quantity of one pound of hazardous waste and that is immediately contained and cleaned up is exempted from this requirement.

d. Was a report to the Department, as specified in 264.196(d)(3), submitted within 30 days for nonexempt releases?

☐ Yes ☐ No

e. If a leak was the cause of a release, was the system repaired before being returned to service?

☐ Yes ☐ No

f. If the leak caused a release to the environment from a component of a tank system without secondary containment, was that component provided with secondary containment as specified in 264.193 before it was returned to service (see Item #6)?

☐ Yes ☐ No

NOTE: If the leaking component is aboveground and can be inspected visually, secondary containment does not need to be provided after repair.

\*\*\*: If a component was replaced in order to repair the system, the owner or operator must comply with the standards for new tank systems or components 264.192 and 264.193 (see item #4).

g. Was a major repair performed to return the tank system back to service?

☐ Yes ☐ No

(1) If yes, was a certification of this major repair done by an independent, qualified, registered P.E. before the system was returned to service?

☐ Yes ☐ No

(2) Was this certification submitted to the department within 7 days after returning the system to service?

☐ Yes ☐ No

Comments:

10. Closure and post-closure care (264.197).

- a. At closure of a tank system, did the owner/operator remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste? N/A \_\_\_\_ Yes \_\_\_\_ No

Comments:

11. Special requirements for ignitable or reactive wastes (264.198).

- a. Are ignitable or reactive wastes placed in tanks? ✓ Yes \_\_\_\_ No

(1) If yes, are they treated, rendered, or mixed before or immediately after placement in the tank system so that:

- The resulting waste, mixture, or dissolved material no longer meet the definition of ignitable or reactive waste and 264.17(b) is complied with? \_\_\_\_ Yes ✓ No

OR

- The waste is stored or treated in such a way that is protected from any material or conditions that may cause the waste to ignite or react? \_\_\_\_ Yes \_\_\_\_ No

NOTE: If yes, use narrative explanation sheet to describe separation and confinement procedures. If no, use narrative explanation sheet to describe sources of ignition or reaction.

*Kept in separate tanks*

- OR - The tank system is used solely for emergencies? \_\_\_\_ Yes ✓ No

- b. Are protective distances maintained between the tank accumulation areas and any public ways, streets, alleys, or adjoining property lines that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? ✓ Yes \_\_\_\_ No

Comments:

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## 12. Special requirements for incompatible wastes (264.199).

- a. Is there evidence that incompatible wastes were in the same tank?

Yes ☒ No

NOTE: If yes, use narrative explanation sheet to state the results (e.g. signs such as fire, toxic mists, heat generation, bulging containers, etc.) and whether 264.17(b) was complied with.

- b. If a waste is to be placed in a tank that previously held an incompatible waste or material, was that tank washed?

Yes ☐ No ☒

NOTE: If yes, describe the washing procedure on the narrative explanation sheet. If no, was 264.17(b) complied with?

Yes ☐ No ☐

## 13. Specific Conditions on Permit:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Yes ☐ No ☐

Yes ☐ No ☐

Yes ☐ No ☐

Yes ☐ No ☐



Date 10/9/92  
Inspector GUY GREGORY HESS  
Facility ID# FD 964112791

SURFACE IMPOUNDMENTS CHECKLIST

N/A

(40 CFR Part 264 Subpart K - Surface Impoundments)  
264\_\_\_\_ Permit Condition\_\_\_\_

NOTE: If multiple surface impoundments exist, list each impoundment and specify compliance or non-compliance on a facility site plan, indicate non-compliance items on diagram.

1. Are there any surface impoundments not being used to hold hazardous waste which were used at the facility for hazardous waste and will not be used in the future? ☐ Yes ☐ No

If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment? ☐ Yes ☐ No

2. Does the facility inspect the impoundments as required in the permit? ☐ Yes ☐ No

3. Does the impoundment appear to maintain adequate freeboard? ☐ Yes ☐ No

4. Does the earthen dike have adequate protective cover to minimize wind and water erosion? ☐ Yes ☐ No

5. Is the area managed to prevent fire, explosion or contamination of the environment? ☐ Yes ☐ No

6. Specific condition on permit:

\_\_\_\_\_  
☐ Yes ☐ No

\_\_\_\_\_  
☐ Yes ☐ No

\_\_\_\_\_  
☐ Yes ☐ No

\_\_\_\_\_  
☐ Yes ☐ No

Date 10/9/92  
Inspector Gray Gregory Hess  
Facility ID# FD044101791

LAND TREATMENT CHECKLIST

(40 CFR Part 264 Subpart M - Land Treatment)  
264\_\_\_\_ Permit Condition\_\_\_\_

N/A

1. Does the owner/operator have records showing the date, rate and method of waste application? ☐ Yes ☐ No
2. Is the run-off analyzed to see if it is a hazardous waste (264.272)? ☐ Yes ☐ No
  - a. If the run-off is considered hazardous, how is it handled? (Use narrative explanation.) ☐ Yes ☐ No
  - b. If it is not a hazardous waste, is it discharged through a point source to surface water? ☐ Yes ☐ NoIf yes, list NPDES Permit No. \_\_\_\_\_
3. Does the owner/operator inspect the unit weekly and after storms to detect evidence of:
  - a. Run-on and run-off control systems operation? ☐ Yes ☐ No
  - b. Wind dispersal control system? ☐ Yes ☐ No
4. Are food chain crops grown (264.276)? ☐ Yes ☐ No
  - a. If yes, can the owner/operator demonstrate from field testing that arsenic, lead, mercury or other toxic waste constituents:
    - (1) will not be transferred to the food portion of the crop or ingested by food chain animals? ☐ Yes ☐ No
    - OR
    - (2) will not occur in greater concentrations in the crops on the facility than in the same crops on untreated soils in the region? ☐ Yes ☐ No
5. Is the following information kept at the facility (264.276):
  - a. Tests for the specific wastes and application rates being used at the facility? ☐ Yes ☐ No

- b. Crop characteristics? ☐ Yes ☐ No
- c. Soil characteristics ☐ Yes ☐ No
- d. Sample selection criteria? ☐ Yes ☐ No
- e. Sample size determination? ☐ Yes ☐ No
- f. Analytical methods used? ☐ Yes ☐ No
- g. Statistical procedures? ☐ Yes ☐ No
6. If waste contain cadmium:
- a. Was the pH of the soil and waste mixture 6.5 or greater at the time of each waste application? ☐ Yes ☐ No
- If the pH was less than 6.5, did the waste contain cadmium concentrations of 2mg/kg or less? ☐ Yes ☐ No
- b. Is the annual application rate of cadmium less than 0.5 kg/ha (kilograms per hectare) for the following: tobacco, leafy vegetables or root crops grown for human consumption? ☐ N/A
- ☐ Yes ☐ No
- (1) For all other food chain crops, is the annual cadmium application rate less than 2.0 kg/ha? ☐ N/A
- ☐ Yes ☐ No
7. Is an unsaturated zone monitoring plan kept at the facility (264.278)? ☐ Yes ☐ No
8. Are ignitable or reactive wastes treated at the facility (264.281)? (Circle appropriate waste.) ☐ Yes ☐ No
- a. If yes, are the wastes immediately incorporated into the soil so that they are no longer reactive or ignitable? ☐ Yes ☐ No
- b. Describe or attach a copy of treatment.
9. Are incompatible wastes placed in the facility (264.282)? ☐ Yes ☐ No
- Are the incompatible wastes placed in different locations in the facility? ☐ Yes ☐ No

If no, look for signs of fire, heat generation,  
toxic mists, etc. (Use narrative explanation.)

10. Is run-on diverted away from the land treatment  
facility (264.272)?

\_\_\_\_Yes \_\_\_\_No

11. Is run-off from the land treatment facility  
collected?

\_\_\_\_Yes \_\_\_\_No

12. Is the area managed to prevent fire, explosion  
or contamination of the environment?

\_\_\_\_Yes \_\_\_\_No

13. Specific conditions on permit.

\_\_\_\_Yes \_\_\_\_No

\_\_\_\_Yes \_\_\_\_No

\_\_\_\_Yes \_\_\_\_No

Date

Inspector

Facility ID#

10/9/92

Gray Gregory Hess

FD984167791

LANDFILLS CHECKLIST

(40 CFR Part 264 Subpart N - Landfills)

264\_\_\_ Permit Condition\_\_\_

N/A

1. Is the waste from the collected run-off analyzed to determine if it is a hazardous waste or is it by definition a hazardous waste?

\_\_\_Yes \_\_\_No

- a. If it is a hazardous waste, how is it managed?  
(Use narrative explanation.)

- b. Is the collected run-off discharged through a point source to surface water?

\_\_\_Yes \_\_\_No

(1) If yes, list NPDES Permit Number\_\_\_\_\_

2. Does the owner/operator inspect the following weekly or after storms?

- a. Run-on and run-off control system operation?

\_\_\_Yes \_\_\_No

- b. Leak detection system?

\_\_\_Yes \_\_\_No

- c. Wind dispersal control system?

\_\_\_Yes \_\_\_No

- d. Leachate collection and removal systems?

\_\_\_Yes \_\_\_No

3. Is the following information maintained in the operating record (264.309):

- a. On a map, the exact location and dimensions, including depth of each cell with respect to permanently surveyed benchmarks?

\_\_\_Yes \_\_\_No

AND

- b. Contents of each cell and the approximate location of each hazardous waste type within each cell?

\_\_\_Yes \_\_\_No

4. Are reactive or ignitable wastes placed in the landfill (264.312)?

\_\_\_Yes \_\_\_No

- a. If yes, is it treated, rendered, or mixed before or immediately after placement in the landfill so it is no longer reactive or ignitable?

\_\_\_Yes \_\_\_No

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b. Describe treatment, etc., or attach a copy of treatment.

5. Are incompatible wastes placed in the same landfill cell (264.313)?

\_\_\_Yes \_\_\_No

If yes, what were the results? (Use narrative explanation.) (Look for signs of mixing of incompatible wastes; e.g., fire, toxic mist, heat generation, etc.)

6. Is run-on diverted from the landfill (264.301)?

\_\_\_Yes \_\_\_No

7. Is the landfill managed so that wind dispersal is controlled (264.301)? (Note blowing debris.)

\_\_\_Yes \_\_\_No

8. Are bulk or non-containerized liquid wastes or wastes containing free liquids placed in the landfill (264.314)?

\_\_\_Yes \_\_\_No

a. If yes, does the landfill have:

- (1) A liner which is chemically and physically resistant to the added liquid?

\_\_\_Yes \_\_\_No

AND

- (2) A functioning leachate collection and adequate removal system?

\_\_\_Yes \_\_\_No

OR

- b. Is the liquid waste treated chemically or physically so that free liquids are no longer present?

\_\_\_Yes \_\_\_No

9. Are containers holding liquid wastes placed in the landfill (264.314)?

\_\_\_Yes \_\_\_No

If yes, is the container designed to hold liquids for a use other than storage (e.g., battery, capacitor)?

\_\_\_Yes \_\_\_No

10. Are empty containers placed in the landfill (264.315)?

\_\_\_Yes \_\_\_No

If yes, are they reduced in volume (e.g., shredded, crushed)?

\_\_\_Yes \_\_\_No

DATE \_\_\_\_\_  
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11. Is there evidence of site instability?  
(e.g., erosion, settling)? (Use narrative  
explanation.) ☐ Yes ☐ No
12. Is there evidence of ponding of water on site?  
(Use narrative explanation.) ☐ Yes ☐ No
13. Is there any indication of improper or  
inadequate drainage? (Use narrative explanation.) ☐ Yes ☐ No
14. Is the area managed to prevent fire, explosion,  
or contamination of the environment? ☐ Yes ☐ No
15. Specific conditions on permit.
- \_\_\_\_\_ ☐ Yes ☐ No
- \_\_\_\_\_ ☐ Yes ☐ No
- \_\_\_\_\_ ☐ Yes ☐ No
- \_\_\_\_\_ ☐ Yes ☐ No

Date 10/9/92  
Inspector Gray, Gregory, Hess  
Facility ID# FLD9641167791

INCINERATORS CHECKLIST  
(40 CFR Part 264 Subpart O - Incinerators)  
264\_\_ Permit Condition\_\_

N/A

1. Is the incinerator operating at steady state conditions (temperature and air flow) before adding hazardous waste (264.345)? \_\_Yes \_\_No

If no, explain in narrative.

2. Does operating record include analysis of the following:

- |                              |            |
|------------------------------|------------|
| a. heating value?            | __Yes __No |
| b. halogen content?          | __Yes __No |
| c. sulfur content?           | __Yes __No |
| d. concentration of lead?    | __Yes __No |
| e. concentration of mercury? | __Yes __No |

NOTE: d. and e. not required if facility has written, documented data that show the elements are not present.

3. Does the owner/operator monitor the following when incinerating hazardous waste? Are any of the following instruments existing on the incinerator? (264.347(a)) (Check under applicable column.)

- a. Does the owner/operator monitor the following at least every 15 minutes?

	<u>Existing</u>	<u>Monitored</u>
1. Waste feed	__Yes __No	__Yes __No
2. Auxiliary fuel feed	__Yes __No	__Yes __No
3. Air flow	__Yes __No	__Yes __No
4. Incinerator Temperature	__Yes __No	__Yes __No
5. Scrubber flow	__Yes __No	__Yes __No
6. Scrubber pH	__Yes __No	__Yes __No
7. Relevant level controls	__Yes __No	__Yes __No

(After burner and temperature, O<sub>2</sub>, and CO meters are examples of relevant level controls.)



b. Does the owner/operator monitor the stack plume (emissions) at least hourly for (264.347(b)):

- (1) color (normal)? ☐ Yes ☐ No  
(2) opacity? ☐ Yes ☐ No

c. Does the owner/operator monitor the incinerator and associated equipment at least daily including (264.347(c)):

Circle those not in compliance.

- (1) pumps, valves, conveyors, pipes for leaks, spills, and fugitive emissions?  
(Use narrative explanation.) ☐ Yes ☐ No  
(2) emergency shutdown controls? ☐ Yes ☐ No  
(3) system alarms? ☐ Yes ☐ No

d. Are these inspections referenced in the inspection log? Review inspection plan, note deficiencies in narrative.

☐ Yes ☐ No

4. Is the area managed to prevent fire, explosion or contamination of the environment?

☐ Yes ☐ No

5. Specific conditions on permit.

\_\_\_\_\_  
☐ Yes ☐ No  
\_\_\_\_\_  
☐ Yes ☐ No  
\_\_\_\_\_  
☐ Yes ☐ No  
\_\_\_\_\_  
☐ Yes ☐ No

Date 10/9/92  
Inspector Gray Gregory Hess  
Facility ID# FLD9941107791

THERMAL TREATMENT CHECKLIST  
(40 CFR Part 265 Subpart P - Thermal Treatment)  
40 CFR 265 Permit Condition

N/A

NOTE: Applies to thermal treatment of hazardous waste in devices other than incinerators.

1. Is the process a non-continuous (batch) process? ☐ Yes ☐ No  
If no, is the process operating at steady state conditions (including temperature) before adding hazardous waste (265.373)? ☐ Yes ☐ No
2. Is a waste analysis, for wastes not previously treated, documented in the operating record (265.375)? ☐ Yes ☐ No
- a. Is a waste analysis performed on hazardous wastes not previously treated at the facility? ☐ Yes ☐ No
- b. Does it include analyses for the following:
- (1) heating value? ☐ Yes ☐ No  
(2) halogen content? ☐ Yes ☐ No  
(3) sulfur content? ☐ Yes ☐ No  
(4) concentration of lead? ☐ Yes ☐ No  
(5) concentration of mercury? ☐ Yes ☐ No

NOTE: 4. and 5. not required if facility has written, documented data that show the elements are not present.

3. Are the following instruments existing on the thermal treatment device (265.377): (Check existing column only.)

- a. Are the existing instruments which relate to combustion and emission control monitored at least every 15 minutes?

	<u>Existing</u>	<u>Monitoring</u>
(1) Waste feed	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
(2) Auxiliary fuel feed	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
(3) Treatment process temperature	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
(4) Relevant process flow	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
(5) Relevant controls (e.g., after burner, and temperature controls, O <sub>2</sub> and CO meters	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

b. Are stack plumes (emissions) monitored at least hourly:

- (1) color (normal)? ☐ Yes ☐ No  
(2) opacity? ☐ Yes ☐ No

c. Is thermal treatment process equipment monitored at least daily including: (NOTE: Circle those not in compliance.)

1. pumps, valves, conveyors, pipes, etc. (for leaks, spills and fugitive emissions)? ☐ Yes ☐ No  
2. emergency shutdown controls? ☐ Yes ☐ No  
3. system alarms? ☐ Yes ☐ No

4. Is there evidence of any open burning of hazardous waste (265.382)? (Use narrative explanation.) ☐ Yes ☐ No

5. Is open burning or detonation of waste explosives conducted (265.382)? ☐ Yes ☐ No

If yes, is the detonation performed in accordance with the following table? ☐ Yes ☐ No

Pounds of Waste Explosives or Propellants	Minimum Distance from Open Burning or Detonation to the Property of Others
0-100	204m (670 ft)
101-1,000	380m (1,250 ft)
1,001-10,000	530m (1,730 ft)
10,001-30,000	690m (2,260 ft)

6. Is the area managed to prevent fire, explosion or contamination of the environment? ☐ Yes ☐ No

7. Specific conditions on permit.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

☐ Yes ☐ No  
☐ Yes ☐ No  
☐ Yes ☐ No  
☐ Yes ☐ No

Date 10/9/92  
Inspector Gray Gregory #22  
Facility ID# 110964167791

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT CHECKLIST  
(40 CFR Part 265 Subpart Q - Chemical, Physical and Biological Treatment)  
265\_\_\_\_ Permit Condition\_\_\_\_

N/A

NOTE: Applies to treatment in other than tanks, surface impoundments, and land treatment facilities.

1. Describe treatment process (include information on wastes treated).
2. Check treatment process and equipment (265.401):

Are there any leaks, corrosion or other failures evident? ☐ Yes ☐ No  
If yes, describe. \_\_\_\_\_

3. Is the process a continuous feed system? ☐ Yes ☐ No

If yes, is it equipped with a means to stop waste inflow (e.g., waste feed cutoff system or bypass)? ☐ Yes ☐ No

4. If a hazardous waste is to be treated which is substantially different from any hazardous waste previously treated at the facility, or if a substantially different process than any previously used at the facility is to be used to chemically treat hazardous wastes, are the following obtained (265.402):

a. Waste analyses and trial treatment tests (e.g., bench scale)? ☐ Yes ☐ No

OR

b. Written, documented information on similar treatment of similar wastes? ☐ Yes ☐ No

5. Does the owner/operator inspect the following, where present (265.403)? (Indicate which items are present.) ☐ Yes ☐ No

a. At least daily:

(1) Discharge control and safety equipment (e.g., waste feed cutoff, bypass, drainage or pressure relief systems)? ☐ Yes ☐ No

(2) Data gathered from monitoring equipment (e.g., pressure and temperature gauges)? ☐ Yes ☐ No

b. At least weekly:

Construction materials of treatment process or equipment to detect corrosion or obvious signs of leakage? ☐ Yes ☐ No

DATE \_\_\_\_\_  
FACILITY ID \_\_\_\_\_

6. Are ignitable or reactive wastes placed in the treatment process (265.405)? (Circle appropriate waste). \_\_\_Yes \_\_\_No

If yes, is the waste treated, rendered, or mixed before or immediately after being placed in the treatment process so it no longer meets the definition of ignitable or reactive? (Describe or attach a copy of the treatment.) \_\_\_Yes \_\_\_No

7. Has the facility treated incompatible wastes (265.406)? \_\_\_Yes \_\_\_No

If yes, what were the results? (Look for signs of mixing of incompatible wastes; e.g., fire, toxic mist, heat generation, etc.) (Use narrative explanation.)

8. If a waste is to be placed in treatment equipment that previously held an incompatible waste, was that equipment washed? \_\_\_Yes \_\_\_No

If yes, describe washing procedures. (Use narrative explanation.)

Describe how it is possible for incompatible wastes to be placed in the same treating equipment. (Use narrative explanation.)

9. Is the area managed to prevent fire, explosion or contamination of the environment? \_\_\_Yes \_\_\_No

10. Specific conditions on permit.

	___Yes ___No
	___Yes ___No
	___Yes ___No
	___Yes ___No

RCRA INSPECTION REPORT  
LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility ID#: FZD984167791 Date of Inspection: 10/9/92

Facility Name: SAFETY - KLEEN / BOYNTON BEACH

Facility Address: \_\_\_\_\_

Facility Phone #: 607 Facility Contact: THOMAS SANDS

Contact's Title: BRANCH MANAGER

Persons present for Inspection: \_\_\_\_\_

Date and Time Inspection Began: 10/9/92 10:00 AM

Date and Time Inspection Ended: 10/9/92 12:20 PM

1. (a) Describe the generator's restricted waste streams (use the LDR Treatment Standards list) and the destination of each.

DO01 - Liquid & Dumpster mud  
FO02, FO04 - spent immersion cleaners (old)  
DO06, DO07, DO08 - spent immersion cleaners (new)  
FO02 - perchloroethylene  
FO03, FO05 - Paint related waste  
DO01, DO06, DO08 - mineral spirits  
DO04 - DO11, DO18, DO19, DO21 - DO30, DO32 - DO43 - FRS waste

} Tampa, FL  
} Lexington, ~~SC~~ SC

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(b) Are the wastes correctly identified? (You may need to review TOC, TSS, HOC, TCLP, PFLT, 3rd Thirds WW, NWW, Technology Acronyms, Tables 268.41, 268.42 & 268.43.) [268.7 Notices for 3rd Third includes variance until 8-8-90: Minimum Technology]

*yes*

(c) Is the generator storing restricted waste on site?

*yes*

Is the generator complying with 268.50?

*yes*

Is the generator complying with 262.34 as required by 268.50(a)(1)?

*yes*

Are the wastes identified correctly?

*yes*

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Have LDR wastes been stored over 90 days (generator)?

No

If the facility is a TSD and has been storing LDR wastes for over a year, can the TSD prove (if challenged) that the reason for such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal?

N/A

(d) Does the generator have a case-by-case extension or a variance? (specify)

N/A

## II. Waste with Treatment Standards

(a) Do the Notifications required by 268.7 include:

EPA Hazardous Waste #: yes

Applicable Treatment Standards or proper reference for wastes other than F001-F005, F020-F023, F026-F028, and California List (3rd Third Rule):

yes

Manifest Document #'s: yes

Waste Analysis Data, where available: yes

Certification Statement if Generator is Claiming to meet Treatment standards: yes

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Date Waste is Subject to Prohibitions if  
Subject to a Case-By Case Extension or Variance:

N/A  
yes

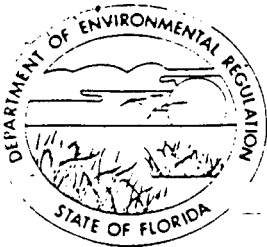
III. Does the generator maintain the above records on-site for five (5) years?

yes

IV. Additional Notes and Comments:

(Check for soft hammer compliance prior to May 8, 1990.)

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Date 3-12-91



# Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 •

Scott Benyon, Deputy Assistant Secretary

## HAZARDOUS WASTE SITE INSPECTION EXIT INTERVIEW SUMMARY

FACILITY: SAFETY - KAREN / BOYNTON BEACH DATE: 10/9/92

This exit interview is the Department's attempt to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-30, which adopts 40 CFR Parts 260-266 by reference. It is possible that the list of violations noted (checked) is incomplete. After Department internal review an inspection report will be finalized. In most cases the deficiencies noted by the investigator will not change in the final report, therefore, you are advised to immediately begin correcting these deficiencies noted below.

Please also be aware that the Department has signed an enforcement agreement with the USEPA which calls for the assessment and collection of monetary penalties when violations, such as these, are noted. While your quick response in correcting the deficiencies may not reduce calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

- ☐ 1. Hazardous waste determination [§262.11]. (See comments below).
- ☐ 2. Notification as a generator [§262.12].
- ☐ 3. Manifest deficiencies [§262 Subpart B].
- ☐ 4. Recordkeeping [e.g. test results, manifest, annual reports; §262.44].
- ☐ 5. Personnel training [§265.16; §262.34(d) for SQ].
- ☐ 6. Contingency Plan and Emergency Planning [§265 Subpart D; §262.34(d) for SQ].
- ☐ 7. Arrangements with local authorities [§265.37].
- ☐ 8. Emergency equipment [§265.32].
- ☐ 9. Aisle space [§265.35].
- ☐ 10. Container and tank labels [§265.34].
- ☐ 11. Open containers [§265.173].
- ☐ 12. Condition of containers [§265.171].
- ☐ 13. 50 foot rule for containers [265.176].
- ☐ 14. Tank requirements [§265 Subpart J].
- ☐ 15. "No smoking" signs or other ignitable/reactive requirements [§265.17].
- ☐ 16. Annual reporting [F.A.C. 17-30].
- ☐ 17. Accumulating >1000 kg without meeting 100-1000 kg/month standards [§261.5].
- ☐ 18. Ensuring delivery of HW to a proper HW facility [§261.5].
- ☐ 19. Notification as a TSD facility [§264.11].
- ☐ 20. Treatment without a permit [F.A.C. 17-30].
- ☐ 21. Storage without a permit [F.A.C. 17-30].
- ☐ 22. Disposal without a permit [F.A.C. 17-30].
- ☐ 23. Groundwater monitoring [§264 Subpart G].
- ☐ 24. Closure/post-closure [§264 Subpart G].
- ☐ 25. Notice in Deed [§264.120].
- ☐ 26. Financial responsibility [§264 Subpart H].
- ☐ 27. Other violations (see comments).

Comments: FACILITY APPEARS TO BE OPERATING IN COMPLIANCE WITH  
THE PERMIT. NO APPARENT HAZARDOUS WASTE VIOLATIONS WERE  
OBSERVED. THE FACILITY AND RECORDS WERE NEAT AND ORDERLY  
AND WELL MAINTAINED.

RECEIPT ACKNOWLEDGED BY  
drd/88

INVESTIGATOR