

From: Glorioso, Vinnie
To: [Mitchell, Cheryl L](#)
Subject: RE: HCC Jacksonville FDEP inspection email 3
Date: Monday, June 4, 2018 3:13:35 PM

Cheryl,

One of your other concerns was about EPA id numbers of our customers on how we check on this. HCC uses a generator certification form where we would ask the customer their EPA ID number. In addition I contacted waste approvals and received a response "We often do double check records. There is not a requirement for a transporter to verify EPA ID numbers."

As for drum labeling- You mentioned a blue label that says RCRA not regulated and said this was not adequate. Our waste approvals department told me: Only RCRA exempt (such as nonhaz or VSQG) utilize this exemption. I believe this an exemption they're referring to: https://www.ecfr.gov/cgi-bin/text-idx?node=se40.28.262_114

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