From: Heyns, Jared
To: shawnmckenzie@nrcc.com
Cc: pfulton@nrcc.com; Blandin, Norva; Grajeda, Carlos
Subject: NRC Gulf Environmental Services, Inc. (EPAID FLD099077257) Exit Interview
Date: Tuesday, August 20, 2019 4:45:00 PM

Shawn,

This email serves as an exit interview to the routine Compliance Evaluation Inspection (CEI) conducted by the Florida Department of Environmental Protection (FDEP) on Thursday, August 15th, 2019 to determine your facility's compliance with federal and state hazardous waste regulations. Thank you again for your time and assistance throughout the inspection. The following potential non-compliance items were observed during the inspection:

- 40 CFR 263.20(a)(1) – Failure to comply with the Manifest System - Department inspectors observed that in at least one instance bills-of-lading were used in place of the Manifest System on a pick-up of Hazardous Waste described as fireworks. These bills-of-lading were in regards to a pick-up conducted on 05/19/2017 for the City of Pompano Beach. Also, several manifests were observed to be incomplete by lacking EPA waste codes associated with the listed Hazardous Waste.
- 40 CFR 263.21(a)(3) – Failure to comply with the Manifest System – Department inspectors observed several manifests (010535635JJK, 010535618JJK, 016432553JJK, 016432552JJK, 016432555JJK) which contained a signature for a second transporter in Line #17 of the Uniform Hazardous Waste Manifest, but did not list a Transporter #2 in Line #7 of the manifest. Please provide copies of the these manifests.
- 40 CFR 263.22(a) - Hazardous Waste Transporter recordkeeping requirements – Department inspectors observed several manifests (010535635JJK, 010535618JJK, 020902503JJK) lacking a final signed copy received from the destination facility. Please provide a copy of the third signed copy of the hazardous waste manifests for the last three (3) years.

Also, please provide the following documentation for the Department to review:

- Copies of all hazardous waste manifests for the last three (3) years, including those under the name of 'SWS Environmental Services'.
- An explanation of how NRC Environmental operates as a primary transporter and uses Stericycle as a secondary transporter, as well as a description of your facility's role as an emergency contract service.
- Records of employee training for 2017. Department inspectors viewed employee training records for years 2018 and 2019 at the time of the inspection, but were not able to review 2017 records.

Please provide a response and documentation by close-of-business Friday, August 30th. Feel free to reach out to myself or Norva Blandin if there are any questions or concerns. Thank you for your help with these matters.

Regards,

Jared Heyns

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