Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Florida Transformer LLC DBA Emerald Transformer

On-Site Inspection Start Date: 02/24/2021 **On-Site Inspection End Date:** 02/24/2021

ME ID#: 74617 **EPA ID#:** FLR000168203

Facility Street Address: 4509 State Highway 83 N, Defuniak Springs, Florida 32433-3960

Contact Mailing Address: P O BOX 507, Defuniak Springs, Florida 32433-3960

County Name: Walton **Contact Phone:** (850) 892-2711

NOTIFIED AS:

LQG (>1000 kg/month), Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Transporter:** Own Waste, Commercial Waste **Used Oil:** On-Spec, Oil Filters, Processor

Universal Waste: Indicate types of UW generated and/or accumulated at the facility:

Generate/Accumulate: Batteries **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for LQG (>1000 kg/month) Facility
Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for Used Oil Processor Facility
Routine Inspection for Used Oil Marketer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Monica Hardin, Inspector
Héctor Danois, Environmental Engineer; Kayla Acosta, Physical Scientist; Jessica Pennington, Director Environmental Health and Safety; Kimber Armstrong, Regulated Services Supervisor

Other Participants:

LATITUDE / LONGITUDE: Lat 30° 47' 9.6599" / Long 86° 7' 16.1428"

NAIC: 335311 - Power, Distribution, and Specialty Transformer Manufacturing

TYPE OF OWNERSHIP: Private

Introduction:

Florida Transformer LLC (FL Transformer or facility) is a power transformer repair and processing facility located in DeFuniak Springs, Florida. The facility, situated on approximately 25 acres, has been in operation for over 40 years and currently has 93 employees. The current operations include transformer repair, service, sales, and used oil processing. The facility is a large quantity generator (LQG) of hazardous waste, and a registered hazardous waste transporter, used oil filter transporter, and used oil transporter, transfer facility, processer, and marketer.

FL Transformer was last inspected on October 25, 2018, by the Florida Department of Environmental Protection (DEP or Department) as a routine used oil processer and a hazardous waste compliance evaluation inspection (CEI) and was determined to be in compliance with applicable state and federal regulations.

A routine hazardous waste CEI was conducted, jointly with the US Environmental Protection Agency (EPA) on Febraruy 24, 2021 to determine compliance with state and federal hazardous waste and used oil regulations. Monica Hardin represented DEP and Héctor Danois and Kayla Acosta represented EPA. The inspection was

facilitated by Jessica Pennington- Director of Safety & Environmental Compliance and Kimber Armstrong- Regulated Services Supervisor.

Inspectors wore personal protective equipment while onsite including safety boots, safety glasses, hard hats, and face mask coverings (due to Covid-19).

Process Description:

Due to Covid-19, the facility was contacted in advance of the onsite inspection and an opening interview was conducted via Teams Meeting on February 19, 2021. Electronic records were requested in advance as well for offsite review. On February 24, 2021 inspectors arrived onsite at approximately 09:00 and were received by Ms. Pennington and Ms. Armstrong we introduced ourselves, briefly discussed the purpose of the visit and discussed a plan for the onsite inspection.

VISUAL INSPECTION

Laboratory

The Laboratory (lab) is in an indoor area immediately adjacent to In Processing with a chemical storage room also nearby. The lab was described as the first point of hazardous waste generation in the facility. The lab is responsible for conducting analyses on all equipment's oil that comes into the facility for repair. Hexane and sulfuric acid are primarily used for extraction in a gas chromatic spectrometer.

Within the lab we observed one satellite accumulation area (SAA) with one 5-gallon container labeled for hazardous waste and PCB waste. The container appeared closed and in good condition but did not appear to have an indication of the content's hazards (photo 1). The container is emptied daily in the 90-day accumulation area. There was also one 5-gallon container for PCB contaminated wastes such as pipettes and gloves; no liquid wastes are placed within this container.

In Processing

In Processing is a large warehouse building with five garage bays and an extended roof covering a loading dock area. The facility receives electrical equipment such as transformers and capacitors via a transportation fleet owned by the facility with the exception of three contract drivers. Equipment is unloaded and placed on a conveyor system into one of ten assembly lines based on type. Transformers that are destined for disposal from a generator must be accompanied with oil analysis documents upon arrival at the facility. Transformers destined for repair have oil samples taken upon arrival at the facility, a barcode is attached and remains with the equipment for the duration of its time at the facility. Once oil analyses are obtained, the equipment receives a colored tag based on polychlorinated biphenyl (PCB) concentrations in parts per million (ppm). In addition to the colored tags, transformers are also temporarily spray painted with their tag color and the PCB concentration is written on the lid.

Oils that are found to have less than two ppm of PCBs are filtered, visually inspected for moisture and placed into a storage tank. The removed oils that range between 2-49 ppm of PCBs are pumped to one of three holding tanks. These oils are then processed via the onsite oil processing equipment (Redragon) and subsequently stored in a 15,000-gallon tank. Transformer oils that have between 50 and 499 ppm of PCB content are pumped into storage tanks located in the PCB storage room.

Fire extinguishers, a shower & eyewash station, and multiple spill kits were noted throughout the area.

90-Day Central Accumulation Areas (CAAs)

The 90-day central waste accumulation areas are located along three different walls within In Processing. Florida Transformers has managed the waste storage area as one area, however it was noted during the inspection that there appears to be three separate designated areas.

At the time of inspection, CAA 1 located in the southwest corner contained four large boxes of lab waste. CAA 2 located next to the mineral spirits distillation unit, contained four 55-gallon drums of oil/mineral spirits for

distilling, three 55-gallon drums of used distiller oil, and one 55-gallon drum labeled as hazardous waste for distiller sludge waste and rags. CAA 3 located opposite of CAA 1 contained seven 55-gallon drums labeled as hazardous waste for paint filters (in water) and eight 55-gallon drums of waste PCB sludge (from the Redragon oil processing unit). All the observed containers appeared appropriately labeled, closed, and dated. The oldest accumulation start date noted was December 22, 2020.

It was noted the central accumulation areas were lacking 'No Smoking' signs as required near the storage of ignitable or reactive waste. The facility provided a photo on February 26, 2021 indicating 'No Smoking' signs were added.

Between CAA 1 and CAA 2, Tank Q was noted. Tank Q is a 560-gallon above ground storage tank (AST) for used oil sludge. The tank was located within a shallow containment area that did not appear capable of holding 110% of the capacity of the tank; this tank was also within close proximity to an open door (photo 2).

Between CAA 1 and CAA 3, is the PCB storage area. This area is for storage of consolidated laboratory PCB wastes and transformers that contain used oils having between 50-499 ppm of PCBs. The used oil from these transformers are pumped into the PCB storage room. This area has concrete floors coated with an acrylic sealant and is separated by a concrete berm.

Transformer Repair Shops

The facility conducts repairs on transformers in three areas based on transformer type. Each area contains a welding area, mineral spirits washer, processed oil product tote, and used oil storage containers except for the area for large transformers which did not have a mineral spirits washer. Upon repair transformers are refilled, sealed, tested, and if needed, painted. Observed used oil containers were sitting on secondary containment platforms and appeared appropriately labeled and closed. Closed flip-top containers were also noted for rags at work stations.

Located within the repair shops are specific areas for fabrication and regulator repair. At the time of inspection three 55-gallon drums labeled for used oil in the fabrication area and four 55-gallon drums in the regulator repair area were observed.

PCB transformers and associated equipment have a separate decommissioning process area, as no repairs are performed on PCB equipment. PCB contaminated components are treated in a scrap metal recovery oven for 2.5 hours prior to metal recycling. We observed four 55-gallon drums labeled for PCB oil, three 55-gallon drums of oil (product), and one 55-gallon drum of used mineral spirits labeled as hazardous waste. The observed containers appeared appropriately labeled and closed.

Outside of the repair shops, the facility maintains a self-closing dumpster-style container for oily waste rags and a roll-off dumpster for non-hazardous PCB industrial wastes.

Paint Area

This area consists of three paint booths and a blasting unit. Repaired transformers are painted as needed after sand blasting removes old paint. Two paint booths are accessed from indoors; in this area we observed one 55-gallon drum for paper/floor sweepings. The third paint booth is for larger components and is accessible from outdoors adjacent to the sand blasting unit.

The sand blasting unit collects blasting media and reuses it until it is no longer effective at removing paint. The spent blast material is collected via hoses into one of two 55-gallon drums. The hoses entered the drums through a hole in the top; the hoses did not appear secure with gaps evident between them and the drum top, causing these containers to appear open (Photo 3). There was an additional 55-gallon drum available for when a drum is full. There was also a 55-gallon drum attached to catch grit/dust during the process.

Tank Farm

The tank farm consists of five ASTs for the storage of used oil; three of these tanks, each with a capacity of

8,400-gallons, store used mineral oil before treatment. Two tanks, with 8,825-gallon and 15,000-gallon capacities, are secondary holding tanks for regenerated oil. The storage tanks are steel and are located within constructed secondary containment comprised of sealed concrete; the 15,000-gallon storage tank (PO-2) is double-walled. Additional ASTs are located within the tank farm for varying levels of PCB contaminated oils.

Adjacent to the tank farm is the mobile dechlorination unit ('Redragon') used for processing oils for sale as lubricant. The system treats PCB using a sodium reagent. The resulting solid/sludge waste (sodium chloride) is generated from the unit and accumulated in 55-gallon drums for offsite hazardous waste disposal.

Immediately adjacent to this area outdoors, we observed fifteen IBC totes (approximately 275-gallon) and four 55-gallon drums storing non-conventional used oil. The facility explained that this oil does not mix correctly and cannot be processed in their unit, therefore it is sent offsite to a different vendor. The containers all appeared labeled and closed, however were not located within secondary containment (Photo 4).

Decommission Area

A concrete area covered by a large pole-barn style structure surrounded by a drain leading to one of two storm water retention ponds is where non-PCB transformers destined for disposal are decommissioned; transformers are taken apart and pieces are separated. This area consists of long draining tables that drain to 5-gallon buckets; the equipment that comes through here has already been drained during in-processing, but residue often remains. The oil from the buckets is consolidated in an AST, also located in this area (T-7). 'Used Oil' was not observed on any of these containers or the AST. The AST was also not within appropriate secondary containment and was located near the edge of the concrete base (Photo 5).

RECORDS REVIEW

The following records were reviewed: biennial report (2019), HSWA and weekly inspections (2018-2020), contingency plan, quick reference guide (QRG) and arrangement with local authorities, employee training (2018-2020), Used Oil and HW Transporter registrations (FDEP Used Oil Approval 2020-2021 and FDEP Haz Waste Approval 2020-2021), Used Oil Shipments (2018-2020), Tank Inspections (2018-2020) and Waste Profiles. These records were requested prior to the onsite inspection and were reviewed following the onsite inspection.

It was noted the weekly inspections logs of the 90-day area only indicate one central accumulation area. As discussed above, the central accumulation area appears designated into three distinct areas and the weekly inspection logs must reflect this. The facility should update their log form or create a separate form to ensure all the required notations per 62-730.160(3), F.A.C. are recorded for each central accumulation area.

A closing interview was conducted with the facility on March 30, 2021 via Microsoft Teams to discuss the findings.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.15(a)(4)
Question Number:	4.53
Question:	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)
Explanation:	In the paint area, the grit blast unit sends spent blast media to 55-gallon drums. We observed two 55-gallon drums attached to the unit via hoses through a hole cut in the top of the drum. These hoses were not sealed and gaps were evident. (Photo 3)
Corrective Action:	All hazardous waste containers must remain closed except when adding or removing waste. FL Transformers must ensure the connection between the hoses and drums are

	closed.

Type:	Violation
Rule:	262.15(a)(5)
Question Number:	4.54
Question:	Has the generator marked satellite containers with the words "Hazardous Waste" AND an indication of the hazards of the contents? 262.15(a)(5)(i), 262.15(a)(5)(ii)
Explanation:	The SAA container in the lab was labeled with 'Hazardous waste', but did not appear to identify the hazards of the contents (Photo 1).
Corrective Action:	Label all hazardous waste containers with 'hazardous waste' and an indication of the contents' hazards.

Type:	Violation
Rule:	262.17(a)(1)(vi)(B)
Explanation:	At the time of inspection, the facility did not have 'No Smoking' signs near the central accumulation storage areas storing ignitable wastes.
Corrective Action:	Post 'No Smoking' signs near waste accumulation areas to prevent accidental ignition of ignitable wastes. On February 26, 2021, the facility provided a photo of a posted 'No Smoking' sign.

Type:	Violation
Rule:	279.22(c)(1)
Question Number:	5.4
Question:	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)
Explanation:	In the Decommission Area, containers (used to catch residual used oil) and the AST (T-7) (for consolidating used oil) did not appear labeled with 'Used Oil'.
Corrective Action:	Label all containers and above ground storage tanks used for the storage/accumulation of used oil clearly with 'Used Oil'.

Type:	Violation
Rule:	62-710.401(6)
Question Number:	5.10
Question:	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)
Explanation:	Tank Q (between CAA 1 and 2) was noted within a shallow containment area that did not appear capable of holding 110% of the capacity of the tank (560-gallons) and the tank was located close to an open door (Photo 2). Outside of the Tank Farm, 15 IBC totes and 4 drums were observed on concrete with no apparent secondary containment (Photo 4). In the Decommission Area, T-7 (AST) was sitting on a pallet with no apparent secondary containment; this AST was also near the edge of the concrete pad (Photo 5).
Corrective Action:	Store all containers and above ground storage tanks designated for used oil accumulation/storage (if not double-walled) on an oil-impermeable surface and within secondary containment with the capacity to hold 110% of the volume of the largest tank or container within the containment area.

COMMENTS:

Photos within this report were taken by Kayla Acosta and Monica Hardin.

PHOTO ATTACHMENTS:

Photo 1: Lab SAA with no indication of hazards

Photo 2: Tank Q shallow secondary containment

Photo 3: Grit blasting unit with open SAA drums

Photo 4: IBC totes and drums with no secondary containment

Photo 5: T-7 AST with no secondary containment near soil

Conclusion:

At the conclusion of this inspection, Florida Transformers LLC appeared to be out of compliance with state and federal hazardous waste and used oil regulations. Specifically for, open satellite accumulation containers, satellite accumulation containers lacking a hazards identification, missing ‘No Smoking’ signs near ignitable waste, containers/tanks not clearly marked with ‘Used Oil’, and containers/tanks lacking secondary containment.

4.0: Large Quantity Generator Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	40 CFR 262 Subpart A - General Standards	Yes	No	N/A
4.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
4.2	Did the facility obtain an EPA ID Number prior to treating, storing, disposing, or transporting hazardous waste? 262.18(a)	✓		
4.3	Are any hazardous wastes treated or disposed of on site? 268.7(a)(5), 62-730.240(1)			
4.4	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5)			✓
Item No.	Land Disposal Restrictions	Yes	No	N/A
4.5	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
4.6	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5)			
4.7	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)	✓		
4.8	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)	✓		
4.9	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)	✓		
4.10	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)	✓		
4.11	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			✓
4.12	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
4.13	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)			✓
4.14	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			✓
4.15	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
4.16	If the generator choses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
4.17	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
4.18	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)	✓		

4.19	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
4.20	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓
Item No.	The Manifest	Yes	No	N/A
4.21	Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are not in compliance) 262.20(a)(1) ☐ Item 1. Generator's U.S. EPA Identification Number ☐ Item 2. Page 1 of "X" (total number of pages used to complete the manifest) ☐ Item 3. Emergency Response Phone Number ☐ Item 4. Manifest Tracking Number ☐ Item 5. Generator's Mailing Address, Phone Number and Site Address ☐ Item 6. Transporter 1 Company Name & U.S. EPA ID Number ☐ Item 7. Transporter 2 Company Name & U.S. EPA ID Number ☐ Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number ☐ Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group. ☐ Item 10. Containers (Number and Type) ☐ Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates) ☐ Item 12. Units of Measure (Weight/Volume) ☐ Item 13. Waste Codes. Enter up to 6 of the most representative waste codes. ☐ Item 14. Special Handling Instructions and Additional Information ☐ Item 15. Generator's / Offeror's Certifications ☐ Item 16. International Shipments (Import or Export must be noted) ☐ Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt) ☐ Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility) ☐ Item 19. Hazardous Waste Report Management Codes (On returned copies only) ☐ Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)	✓		
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✓		
4.23	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✓		
4.24	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✓		
4.25	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✓		
4.26	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23(c)			✓
4.27	For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) ☐ The next non-rail transporter? ☐ The Designated Facility if transported solely by rail?			✓

	☐ The last rail transporter to handle the waste in the U.S. if exported by rail?			
4.28	If the generator did not receive a signed return copy of the manifest from the designated facility within 35 days of shipment, did the generator contact the transporter and/or designated facility? 262.42(a)(1)	✓		
4.29	If the generator did not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, did the generator file an exception report? 262.42(a)(2)			✓
4.30	If an exception report was submitted did it include a legible copy of manifest? 262.42(a)(2)(i)			✓
4.31	If an exception report was submitted did it include a cover letter signed by the generator explaining efforts taken to locate the waste and the results of those efforts? 262.42(a)(2)(ii)			✓
4.32	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
4.33	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
4.34	If YES, did the generator meet the requirements of 262.23(f)			✓
Item No.	Pre Transport Requirements	Yes	No	N/A
4.35	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
4.36	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓
4.37	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
4.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are not in compliance) 262.32(b) ☐ Generator's Name and Address? ☐ Generator's EPA ID Number? ☐ Manifest Tracking Number?			✓
4.39	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	Accumulation Requirements	Yes	No	N/A
4.40	Does the facility accumulate hazardous waste on-site prior to treatment or disposal?			
4.41	If YES identify applicable accumulation units: ☑ Containers - Complete Container Checklist also CC as applicable ☐ Tanks - Complete Tanks Checklist also AA, BB, and CC, as applicable ☐ Drip Pads - Complete Drip Pad Checklist ☐ Containment Buildings - Complete Containment Buildings Checklist			
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.17(b)	✓		
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 262.17(b)			✓
4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 262.17(a)(8)(iii)? 262.17(a)(8)(iii)			✓
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.17(a)(5)(i)(C)	✓		
4.46	Has the generator ensured an indication of the hazards of the content is visible for inspection on each hazardous waste container? 262.17(a)(5)(i)(B)	✓		
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked	✓		

	clearly with the words "Hazardous Waste"? 262.17(a)(5)(i)(A)			
4.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
4.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a)	✓		
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.15(a)	✓		
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.15(a)(1)	✓		
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.15(a)(2)	✓		
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)		✓	
4.54	Has the generator marked satellite containers with the words "Hazardous Waste" AND an indication of the hazards of the contents? 262.15(a)(5)(i), 262.15(a)(5)(ii)		✓	
4.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point? (If No, mark all items below as N/A.)			
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.17(a)(5)(i)(A)	✓		
Item No.	Use and Management of Containers	Yes	No	N/A
4.58	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.17(a)(1)(ii)	✓		
4.59	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.17(a)(1)(iii)	✓		
4.60	Does the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.17(a)(1)(iv)(A)	✓		
4.61	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 262.17(a)(1)(iv)(B)	✓		
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.17(a)(1)(v)	✓		
4.63	Does the generator properly document the weekly inspections? 62-730.160(3)	✓		
4.64	This should include at a minimum: (Check items below that are not in compliance) ☐ Date and Time of inspection ☐ Legibly printed name of inspector ☐ Number of hazardous waste containers ☐ Condition of containers ☐ Notation of observations made ☐ Date and nature of any repairs or remedial actions			
4.65	Does the generator ensure ignitable and/or reactive wastes are not stored closer than 50 feet to the facility's property line? 262.17(a)(1)(vi)(A)	✓		
4.66	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 262.17(a)(1)(vii)(A)	✓		
4.67	If the facility places hazardous waste in an unwashed container that previously held incomplatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 262.17(a)(1)(vii)(B)			✓
4.68	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.17(a)(1)(vii)(C)	✓		
Item No.	Personnel Training	Yes	No	N/A

4.69	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 262.17(a)(7)(i)(A)	✓		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 262.17(a)(7)	✓		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 262.17(a)(7)	✓		
4.72	Is the training program designed to ensure facility personnel respond effectively to emergencies and did not fail to cover emergency procedures and equipment? 262.17(a)(7)	✓		
4.73	Does the generator conduct training within 6 months of hire or within 6 months of an employee moving to a new position that requires training? 262.17(a)(7)	✓		
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 262.17(a)(7)	✓		
4.75	Does the generator review training annually, at least once each calendar year? 262.17(a)(7)	✓		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 262.17(a)(7)	✓		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 262.17(a)(7)	✓		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 262.17(a)(7)	✓		
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 262.17(a)(7)	✓		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 262.17(a)(7)	✓		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 262.17(a)(7)	✓		
Item No.	Preparedness and Prevention	Yes	No	N/A
4.82	Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? 262.251	✓		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 262.252(a)	✓		
4.84	Does the facility provide a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.252(b)	✓		
4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 262.252(c)	✓		
4.86	Does the facility provide and maintain water at adequate volume and pressure available to supply waterhose streams, foam producing equipment, automatic sprinklers, or water spray systems? 262.252(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 262.253	✓		
4.88	When hazardous waste is being handled, does the facility ensure all personnel involved have immediate access to an internal alarm or communication device? 262.254(a)	✓		
4.89	If only one employee is on premises while the facility is operating, does the facility ensure the employee has immediate access to a telephone or 2-way radio to summon external assistance? 262.254(b)	✓		
4.90	Does the facility maintain adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility in an emergency? 262.255	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 262.256(a)(2)	✓		
4.92	Where more than one police or fire department may respond, has the facility designated a	✓		

	primary emergency police and/or fire authority? 262.256(a)(3)			
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 262.256(a)	✓		
4.94	Has the facility attempted to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries that could result? 262.256(a)	✓		
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 262.256(b)			✓
Item No.	Contingency Plan and Emergency Procedures	Yes	No	N/A
4.96	Does the facility have a contingency plan? 262.260(a)	✓		
4.97	In the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents did the facility implement the contingency plan implemented immediately? 262.260(b)			✓
4.98	Does the contingency plan describe actions to be taken in response to the following:262.261(a)			
4.99	Fires? 262.261(a)	✓		
4.100	Explosions? 262.261(a)	✓		
4.101	Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? 262.261(a)	✓		
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 262.261(b)	✓		
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 262.261(c)	✓		
4.104	Does the plan list names and emergency phone numbers of emergency coordinator(s)? 262.261(d)	✓		
4.105	Does the plan identify the primary emergency coordinator and list alternates in order the they will assume responsibility? 262.261(d)	✓		
4.106	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 262.261(e)	✓		
4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 262.261(f)	✓		
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 262.262	✓		
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 262.262(a)	✓		
4.110	Has the facility updated the contingency plan with changes in emergency coordinators, facility design, construction, or operations, emergency equipment, plan failure in an emergency, or applicable regulations? 262.263	✓		
4.111	Has the facility designated an emergency coordinator either on premises or on call who is able to reach the facility in a short period of time and able to commit funds for incident response? 262.264	✓		
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 262.265? 262.265	✓		
Item No.	Record Keeping and Reporting	Yes	No	N/A
4.113	If the contingency plan has been implemented, did the owner or operator submit a written report to the Department within 15 days documenting the incident? 262.265(c)			✓
4.114	Does the generator keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for 3 years from the date the waste was last shipped off-site? 262.11(f)	✓		
4.115	Has the generator submitted a biennial report by March 1 of each even numbered year covering activities during the previous year? 262.41(a)	✓		

4.116	Does the generator maintain a copy of the biennial report for at least 3 years from the due date of the report? 262.40(b)	✓		
4.117	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
4.118	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was inteneded to be shipped off-site? 262.83(b)			✓
4.119	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
4.120	If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83			✓

5.0: Used Oil Generator Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)		✓	
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			✓
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)		✓	
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)			✓
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)			✓
5.16	contain the released oil? 279.22(d)(2)			✓
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✓
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✓
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✓		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✓		
Item No.	Used Oil Filter Container Management	Yes	No	N/A

5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)			✓
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)			✓
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)			✓
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)			✓
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)			✓
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)			✓
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)			✓
5.29	contain the released oi62-710.850(5)(b)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
	☐ Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	☐ Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
	☐ Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards?			✓

	[Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)	✓		
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)	✓		
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)			✓
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓
Item No.	Marketing and Processing	Yes	No	N/A
	☐ Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40			

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	CFR 279 Subpart H.]			
	☐ Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

6.0: Transporters Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) ☐ Exemption Type - Tolling Agreement ☐ Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓

6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Monica Hardin	Inspector	
Principal Investigator Name	**Principal Investigator Title**	
M E H	DEP	04/08/2021
Principal Investigator Signature	**Organization**	**Date**

Héctor Danois	Environmental Engineer
Inspector Name	**Inspector Title**
	US EPA
	Organization

Kayla Acosta	Physical Scientist
Inspector Name	**Inspector Title**
	US EPA
	Organization

Jessica Pennington	Director Environmental Health and Safety
Representative Name	**Representative Title**
	Florida Transformers
	Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Kimber Armstrong	Regulated Services Supervisor
Representative Name	**Representative Title**
	Florida Transformers
	Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver:	Brandy Smith	**Inspection Approval Date:**	04/09/2021