



Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
Z-024-152-369

Barry Hamilton, Field Supervisor
AETC
4317-L Fortune Place,
West Melbourne, FL 32904

Warning Letter
Class I Violations
OWL-HW-E-C-94-0039

Brevard County - HW
AETC
FLD984262790

Dear Mr. Hamilton:

A hazardous waste compliance inspection was conducted at your facility on October 25, 1994. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facility with 40 CFR 260-268, adopted in Florida Administrative Code Chapter 62-730.

During the inspection, possible Class I Violations of rules regarding hazardous waste management were noted. These possible violations are set forth in the "Summary of Potential Violations" section of the attached inspection report.

You are advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$50,000 per violation per day pursuant to Sections 403.727, Florida Statutes.

PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations and/or civil penalties for which you may be responsible. If, after further investigation, the Department determines that the violations occurred you may resolve the violations by correcting the violations, or in some cases, by providing an acceptable time schedule within which the violations will be corrected.

This matter may be resolved through the entry of a Consent Order which includes a compliance schedule and an appropriate penalty. Under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued within 120 days of the date of the attached inspection report. In order to avoid the issuance of a NOV a Consent Order must be entered well in advance of that date.

WARNING LETTER
Class I Violations
OWL-HW-E-94-0039
AETC

Please be aware that on all cases involving Class I Violations of RCRA hazardous waste rules, the Department is required to seek civil penalties in accordance with the EPA RCRA Civil Penalty Policy, dated October 26, 1990. A copy of this policy is available upon request.

Please contact Chris Aoussat or William Kappler, Hazardous Waste Section, at (407)894-7555 within 10 days of your receipt of this letter to schedule an informal conference concerning resolution of this matter.

Sincerely,

George Higgins
for William M. Bostwick Jr., P.E.
Acting District Director

Date: February 2, 1995

RS
RS/ca
RS

Enclosures: RCRA Inspection Report

cc: Don Trussell, Tallahassee
Debbie Valin, FDEP
USEPA Region IV
Tom Baker, AETC

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8. Discrepancies With Current Process Description:

First time inspection of this facility.

9. Summary of Potential Noncompliance Items:

a. Regulation: 40 CFR 265.16(a)(3)(c)/(d)(1)/(d)(2)/(d)(4)

Violation: Facility personnel must take part in an annual review of the initial training required per 40 CFR 265.16(a)(1).

AETC failed to show documentation that employees were trained annually in hazardous waste management.

Violation: The owner or operator must maintain the job title for each position, the name of the employee filling each job and a job description for each position listed relating to hazardous waste management.

AETC failed to show documentation showing the name and job title of each employee and position description relating to hazardous waste.

Violation: The owner or operator must maintain records that document that the training required has been given to, and completed by, facility personnel.

AETC failed to produce documentation verifying that facility personnel had been trained in the areas of hazardous waste management by a person trained in hazardous waste management procedures.

b. Regulation: 40 CFR 265.52(c)/(f)/40 CFR 265.53(b)

Violation: The contingency plan must describe the name and the arrangements made with the local hospital that will be used to provide emergency services.

AETC failed to identify in the contingency plan which hospital would provide emergency services.

Violation: The content of the contingency plan must include an evacuation plan and routes for facility personnel where there is a possibility that evacuation could be necessary.

AETC failed to provide for evacuation routes, in case of emergencies, in the contingency plan.

Violation: A copy of the contingency plan and all revisions to the plan must be submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service.

AETC failed to show documentation that all necessary local and State authorities had been notified and supplied with the contingency plan as required.

- c. Regulation: 40 CFR 265.174/FAC 62-730.171(2)(a)/40 CFR 265.15

Violation: The owner or operator must inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

The facility failed to show documentation that containers had been inspected as required. Also, lack of aisle space prevented inspectors from inspecting all, but the first two rows, of containers in the box van at the time of the inspection.

- d. Regulation: FAC 62-730.171(2)(e)

Violation: The transfer facility shall maintain a written record of when all hazardous waste enters and leaves the facility. This record shall include the generator's name, EPA/DEP identification number, and the manifest number. For conditionally exempt small quantity generators without an EPA/DEP identification number, the record shall include the name and address of the generator. This record keeping requirement applies to all hazardous wastes including hazardous waste generated by conditionally exempt small quantity generators.

AETC failed to maintain written documentation, including all the required information, of all hazardous waste entering and leaving the facility.

10. Recommended Corrective Actions:

- a. Regulation: 40 CFR 265.16(a)(3)(c)/(d)(1)/(d)(2)/(d)(4)

Corrective Action: AETC must ensure that facility personnel take part in annual reviews of the initial training required in hazardous waste management as required per 40 CFR 265.16(a)(1). The facility must maintain records that

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document that the training required was received and also include the job title, employee name, and job description for each position relating to hazardous waste.

- b. Regulation: 40 CFR 265.52(c)/(f)/40 CFR 265.53(b)

Corrective Action: The contingency plan must provide for evacuation routes for facility personnel where there is a possibility that evacuation could be necessary, along with the name of the local hospital that will be used to provide emergency services. The contingency plan and all revisions to the plan must be submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service.

- c. Regulation: 40 CFR 265.174/FAC 62-730.171(2)(a)/40 CFR 265.15

Corrective Action: AETC must show that inspections are performed on a weekly basis for areas containing and storing hazardous waste.

- d. Regulation: FAC 62-730.171(2)(e)

Corrective Action: AETC shall immediately maintain a written record of when all hazardous waste enters and leaves the facility. This record shall include the generator's name, EPA/DEP identification number, and the manifest number. For conditionally exempt small quantity generators without an EPA/DEP identification number, the record shall include the name and address of the generator. This record keeping requirement applies to all hazardous wastes including hazardous waste generated by conditionally exempt small quantity generators.

NARRATIVE

I. INTRODUCTION

On October 25, 1994 Chris Aoussat, Bill Kappler, and Debbie Valin(FDEP) in the presence of Barry Hamilton (Field Supervisor) of Advanced Environmental Technology Corporation (AETC), inspected the transfer facility for compliance with hazardous waste regulations.

AETC, located at 4317-L Fortune Place, West Melbourne, Brevard County, Florida, is a transfer facility which stores hazardous waste. The facility is approximately 11,500 sq. ft. in area, and

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is served by the City of West Melbourne for its water and sewage. AETC currently employs 3 employees at this transfer facility. The facility has been operating as a transfer facility since March of 1994. AETC was issued an EPA identification number of FLD984262790.

II. CURRENT PROCESS DESCRIPTION

AETC is a transfer facility which uses Environmental Transfer Corporation (ETC) as a transporter. ETC is owned and operated by AETC, the parent company. ETC travels throughout the state to pick up hazardous waste. The waste is then taken to another transporter, Freehold Cartage in Bartow, Florida or brought back to the transfer facility. According to signatures and dates on the manifests reviewed, some of the hazardous waste materials are kept longer than 24 hours, but all hazardous waste appeared to be managed within the required time limit for a transfer facility of 10 days.

III. WASTE STREAMS

AETC does not generate any hazardous waste of its own but does store hazardous wastes from the following waste streams as examples: D001, D002, D006, D008, D009, F002, F003, F005, U213, U226.

IV. WASTE MANAGEMENT

AETC uses ETC as the transporter to pick up hazardous waste materials from its customers throughout the state. ETC utilizes a 22 ft. enclosed box van with a capacity of 13,000 LBS. According to statements made by Barry Hamilton, the hazardous waste materials are either taken to another transporter, Freehold Cartage in Bartow, Florida or brought back to the transfer facility and kept on site longer than 24 hours until a larger load can be accumulated.

V. INSPECTION

A routine inspection was conducted at the facility on October 25, 1994, by the Department. Barry Hamilton (Field Supervisor) of Advanced Environmental Technology Corporation (AETC) accompanied Bill Kappler, Debbie Valin and Chris Aoussat (FDEP), during the inspection.

AETC operates under the EPA identification number of FLD984262790 as a hazardous waste transfer facility which stores waste for more than 24 hours but less than 10 days. AETC uses Environmental Transfer Corporation (ETC), a subsidiary of AETC, as the hazardous waste transporter operating under the EPA identification number of NJD991291584. The facility is approximately 11,500 square feet and is serviced by the town of West Melbourne for sewage and water.

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ETC travels through out the state utilizing a 22 foot box van, which is enclosed and has a 13,000 pound capacity for the transportation of hazardous waste. The hazardous waste is transported in 55-gallon drums and is either taken to another transporter (Freehold Cartage Inc., in Bartow, Florida) or brought back to the transfer facility. On occasion the hazardous waste material is driven directly to AETC's disposal facility at 2176 Will Suitt Road, North Carolina. Barry Hamilton (Field Supervisor) stated that the facility had been storing hazardous waste since March of 1994. Currently the hazardous waste is being stored on the vehicle on a manmade surface and not in the facility itself. At the time of inspection the box van was at the facility and contained one 5-gallon container of waste methyl ethylketone (MEK) and 28 55-gallon drums containing waste MEK and petroleum distillates. All containers that could be inspected due to available access within the vehicle were marked, labeled and dated properly. There was no other hazardous waste material stored at the facility.

The record review of the facility found that AETC did not have a written record of all waste entering and leaving the facility in accordance with FAC 62-730.171. Also, according to signatures and dates on the various manifests reviewed, some of the hazardous waste materials are kept longer than 24 hours, but all hazardous waste appeared to be managed within the required time limit of 10 days as required under the Florida Administrative Code 62-730. The contingency plan did not name a hospital that would be used nor provide for evacuation routes that would be used during emergency situations. AETC did not document the job titles for each position, the names of the employees filling each position and the job description for each position listed relating to hazardous waste management.

VI. LAND BAN

No violations were found.

VII. CONCLUSION

Following the inspection, an exit interview was conducted with Mr. Hamilton and he was informed of the potential violations. AETC was inspected as a transfer facility and was not in compliance at the time of this inspection.

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VIII. RECOMMENDATIONS:

According to 40 CFR 265.35/FAC 62-730.171(2)(a) the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless it can be demonstrated to the Regional Administrator that the aisle space is not needed for any of these purposes.

Barry Hamilton stated that future expansion of the facility would require an additional trailer for storage of hazardous waste materials. During the inspection of the box van used for transportation, it was noted that only the first two rows of drums could be inspected when the van is full, due to the lack of aisle space. This concern was addressed in a previous letter to Thomas M. Baker, Manager of Transportation and Insurance, dated April 28, 1993. If hazardous waste is stored on these trailers for a period of greater than 24 hours, which appears to be the case, the facility would be required to maintain aisle space according to 40 CFR 264.35.

The Department therefore recommends that AETC implement a plan of action in order to address this issue which will be of concern in the future.

AETC was inspected as a transfer facility and was not in compliance with hazardous waste regulations at the time of this inspection.

Report Prepared By:



Chris Aoussat
Engineer

RS/ca
JK

EXHIBIT I

BREVARD COUNTY - HW
ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION

SUMMARY OF PROPOSED SETTLEMENT OF LIABILITIES

<u>REGULATION VIOLATED</u>	<u>G/B AMOUNT</u>	<u>M-D</u>	<u>Total</u>	<u>MATRIX CATEGORY</u>
40 CFR 265.16(a)(3)(c)/ (d)(1)/(d)(2)/(d)(4)	\$ 6,500	N/A	\$6,500	Moderate/Moderate
40 CFR 265.52(c),(f)/ 40 CFR 265.53(b)	\$ 300	N/A	\$ 300	Minor/Minor
40 CFR 265.174/FAC 62-730.171(2)(a)/ 40 CFR 265.15	\$ 2,250	N/A	\$2,250	Minor/Major
FAC 62-730.171(2)(e)	\$ 9,500	N/A	\$9,500	Moderate/Moderate
TOTAL:	<u>\$ 18,550</u>		<u>\$18,550</u>	

Total Gravity Based Penalty: \$ 18,550

Total Multi-Day Penalty: N/A

Economic Benefit: N/A - less than \$2,500

Total Penalty: \$ 18,550

Chris Aoussat
Prepared By

1/18/95
Date

W.M. Bostwick, Jr.
for W.M. Bostwick, Jr. P.E.
Acting District Director

2/3/95
Date

EXHIBIT II
PENALTY COMPUTATION WORKSHEET

Company Name: AETC

Regulation Violated: 40 CFR 265.16(a)(3)(c)/(d)(1)/(d)(2)/(d)(4)

Assessments for each violation are determined on separate work sheets and totaled.

Part I - Seriousness of Violation Penalty

1.	Potential for Harm:	<u>Moderate</u>
2.	Extent of Deviation:	<u>Moderate</u>
3.	Matrix Cell Range:	<u>\$ 5,000 - 7,999</u>
	Penalty Amount Chosen:	<u>\$ 6,500</u> <u>Mid Range of Cell</u>
4.	Assessment:	<u>\$ 6,500</u>

Part II - Penalty Adjustments

	<u>Percentage Change*</u>	<u>Dollar Amount</u>
1.	Good faith efforts to comply/lack of good faith:	<u>N/A</u>
2.	Degree of willfulness and/or negligence:	<u>N/A</u>
3.	History of Noncompliance:	<u>N/A</u>
4.	Other unique factors:	<u>N/A</u>
5.	Justification for adjustments:	<u>N/A</u>

Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.

PENALTY COMPUTATION WORKSHEET (cont.)

6.	Adjusted Penalty (Line 4, Part I + Lines 1-4, Part II):	<u>\$ 6,500</u>
7.	Multi-day Penalty Amount Chosen From Multi-day Matrix Cell:	<u>N/A</u>
8.	Number of Days of Violation Minus One:	<u>N/A</u>
9.	Multi-day Penalty Amount (Line 7 x Line 8,):	<u>N/A</u>
10.	Economic Benefit of Noncompliance:	<u>N/A</u>
11.	Total (Lines 9 + 10,):	<u>N/A</u>
12.	Ability to Pay Adjustment: Justification for Adjustment:	<u>N/A</u>
13.	Total Penalty Amount (must not exceed \$25,000 per day of violation):	<u>\$ 6,500</u>

PENALTY COMPUTATION WORKSHEET
JUSTIFICATION

Regulation: 40 CFR 265.16(a)(3)(c)/d(1)/(d)(2)/d(4)

Violation: Facility personnel must take part in an annual review of the initial training required per 40 CFR 265.16(a)(1).

AETC failed to show documentation that employees were trained annually in hazardous waste management.

Violation: The owner or operator must maintain the job title for each position, the name of the employee filling each job and a job description for each position listed relating to hazardous waste management.

AETC failed to show documentation showing the name and job title of each employee and position description relating to hazardous waste.

Violation: The owner or operator must maintain records that document that the training required has been given to, and completed by, facility personnel.

AETC failed to produce documentation verifying that facility personnel had been trained in the areas of hazardous waste management by a person trained in hazardous waste management procedures.

The following penalties were calculated using the Department's "Guidelines for characterizing RCRA violations" and are in accordance with Department policy. The guideline violation followed was personnel training violations.

Part I

1. Potential for Harm: The facility failed to train facility personnel annually in hazardous waste management. Therefore, a Moderate potential for harm is warranted.

2. Extent of Deviation: Training was over due more than 1 year, therefore the extent of deviation is Moderate.

3. Multi-day Penalty Justification: Since this was a one time occurrence, no multi-day penalty is calculated.

EXHIBIT II
PENALTY COMPUTATION WORKSHEET

Company Name: AETC

Regulation Violated: 40 CFR 265.52(c)/(f)/40 CFR 265.53(b)

Assessments for each violation are determined on separate work sheets and totaled.

Part I - Seriousness of Violation Penalty

1.	Potential for Harm:	<u>Minor</u>
2.	Extent of Deviation:	<u>Minor</u>
3.	Matrix Cell Range:	<u>\$ 100 - \$ 499</u>
	Penalty Amount Chosen:	<u>\$ 300</u> <u>Mid Range of Cell</u>
4.	Assessment:	<u>\$ 300</u>

Part II - Penalty Adjustments

	<u>Percentage Change*</u>	<u>Dollar Amount</u>
1.	Good faith efforts to comply/lack of good faith:	<u>N/A</u>
2.	Degree of willfulness and/or negligence:	<u>N/A</u>
3.	History of Noncompliance:	<u>N/A</u>
4.	Other unique factors:	<u>N/A</u>
5.	Justification for adjustments:	<u>N/A</u>

Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.

PENALTY COMPUTATION WORKSHEET (cont.)

6.	Adjusted Penalty (Line 4, Part I + Lines 1-4, Part II):	<u>\$ 300</u>
7.	Multi-day Penalty Amount Chosen From Multi-day Matrix Cell:	<u>N/A</u>
8.	Number of Days of Violation Minus One:	<u>N/A</u>
9.	Multi-day Penalty Amount (Line 7 x Line 8,):	<u>N/A</u>
10.	Economic Benefit of Noncompliance:	<u>N/A</u>
11.	Total (Lines 9 + 10,):	<u>N/A</u>
12.	Ability to Pay Adjustment: Justification for Adjustment:	<u>N/A</u>
13.	Total Penalty Amount (must not exceed \$25,000 per day of violation):	<u>\$ 300</u>

PENALTY COMPUTATION WORKSHEET
JUSTIFICATION

Regulation: 40 CFR 265.52(c)/(f)/40 CFR 265.53(b)

Violation: The contingency plan must describe the name and the arrangements made with the local hospital that will be used to provide emergency services.

AETC failed to identify in the contingency plan which hospital would provide emergency services.

Violation: The content of the contingency plan must include evacuation plan and routes for facility personnel where there is a possibility that evacuation could be necessary.

AETC failed to provide for evacuation routes, in case of emergencies, in the contingency plan.

Violation: A copy of the contingency plan and all revisions to the plan must be submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service.

AETC failed to show documentation that all necessary local and State authorities had been notified and supplied with the contingency plan as required.

The following penalties were calculated using the Department's "Guidelines for characterizing RCRA violations" and are in accordance with Department policy. The guideline violation followed was contingency plans and emergency procedures.

Part I

1. Potential for Harm: The facility failed to show documentation that copies of the contingency plan had been submitted to the required agencies. Therefore, a Minor potential for harm is warranted.
2. Extent of Deviation: The extent of deviation is Minor.
3. Multi-day Penalty Justification: A multi-day penalty for this violation is only discretionary, therefore no multi-day penalty is calculated.

EXHIBIT II
PENALTY COMPUTATION WORKSHEET

Company Name: AETC

Regulation Violated: 40 CFR 265.174/FAC 62-730.171(2)(a)/40 CFR 265.15

Assessments for each violation are determined on separate work sheets and totaled.

Part I - Seriousness of Violation Penalty

1.	Potential for Harm:	<u>Minor</u>
2.	Extent of Deviation:	<u>Major</u>
3.	Matrix Cell Range:	<u>\$ 1,500 - \$ 2,999</u>
	Penalty Amount Chosen:	<u>\$ 2,250</u> Mid Range of Cell
4.	Assessment:	<u>\$ 2,250</u>

Part II - Penalty Adjustments

	<u>Percentage Change*</u>	<u>Dollar Amount</u>
1.	Good faith efforts to comply/lack of good faith:	<u>N/A</u>
2.	Degree of willfulness and/or negligence:	<u>N/A</u>
3.	History of Noncompliance:	<u>N/A</u>
4.	Other unique factors:	<u>N/A</u>
5.	Justification for adjustments:	<u>N/A</u>

Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.

PENALTY COMPUTATION WORKSHEET (cont.)

6.	Adjusted Penalty (Line 4, Part I + Lines 1-4, Part II):	<u>\$2,250</u>
7.	Multi-day Penalty Amount Chosen From Multi-day Matrix Cell:	<u>N/A</u>
8.	Number of Days of Violation Minus One:	<u>N/A</u>
9.	Multi-day Penalty Amount (Line 7 x Line 8,):	<u>N/A</u>
10.	Economic Benefit of Noncompliance:	<u>N/A</u>
11.	Total (Lines 9 + 10,):	<u>N/A</u>
12.	Ability to Pay Adjustment: Justification for Adjustment:	<u>N/A</u>
13.	Total Penalty Amount (must not exceed \$25,000 per day of violation):	<u>\$ 2,250</u>

PENALTY COMPUTATION WORKSHEET
JUSTIFICATION

Regulation: 40 CFR 265.174/FAC 62-730.171(2)(a)/40 CFR 265.15

Violation: The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

AETC failed to show documentation that inspections were performed on a-regular basis.

The following penalties were calculated using the Department's "Guidelines for characterizing RCRA violations" and are in accordance with Department policy. The guideline violation followed was unit management.

Part I

1. Potential for Harm: The facility failed to show documentation that inspection of containers was conducted on a weekly basis. Therefore, a Minor potential for harm is warranted.

2. Extent of Deviation: The extent of deviation is Major.

3. Multi-day Penalty Justification: A multi-day penalty for this violation is only presumed, therefore no multi-day penalty is calculated.

EXHIBIT II
PENALTY COMPUTATION WORKSHEET

Company Name: AETC

Regulation Violated: FAC 62-730.171(2)(e)

Assessments for each violation are determined on separate work sheets and totaled.

Part I - Seriousness of Violation Penalty

1.	Potential for Harm:	<u>Moderate</u>
2.	Extent of Deviation:	<u>Major</u>
3.	Matrix Cell Range:	<u>\$ 8,000 - \$ 10,999</u>
	Penalty Amount Chosen:	<u>\$ 9,500</u> Mid Range of Cell
4.	Assessment:	<u>\$ 9,500</u>

Part II - Penalty Adjustments

	<u>Percentage Change*</u>	<u>Dollar Amount</u>
1.	Good faith efforts to comply/lack of good faith:	
	<u>N/A</u>	<u> </u>
2.	Degree of willfulness and/or negligence:	
	<u>N/A</u>	<u> </u>
3.	History of Noncompliance:	
	<u>N/A</u>	<u> </u>
4.	Other unique factors:	
	<u>N/A</u>	<u> </u>
5.	Justification for adjustments:	
	<u>N/A</u>	<u> </u>

Percentage adjustments are applied to the dollar amount calculated on line 4, Part I.

PENALTY COMPUTATION WORKSHEET (cont.)

6.	Adjusted Penalty (Line 4, Part I + Lines 1-4, Part II):	<u>\$9,500</u>
7.	Multi-day Penalty Amount Chosen From Multi-day Matrix Cell:	<u>N/A</u>
8.	Number of Days of Violation Minus One:	<u>N/A</u>
9.	Multi-day Penalty Amount (Line 7 x Line 8,):	<u>N/A</u>
10.	Economic Benefit of Noncompliance:	<u>N/A</u>
11.	Total (Lines 9 + 10,):	<u>N/A</u>
12.	Ability to Pay Adjustment: Justification for Adjustment:	<u>N/A</u>
13.	Total Penalty Amount (must not exceed \$25,000 per day of violation):	<u>\$9,500</u>

PENALTY COMPUTATION WORKSHEET
JUSTIFICATION

Regulation: FAC 62-730.171(2)(e)

Violation: A transfer facility shall maintain a written record of when all hazardous waste enters and leaves the facility. This record shall include the generator's name, EPA/DEP identification number, and the manifest number.

AETC failed to maintain written documentation, including all the required information, of all hazardous waste entering and leaving the facility.

The following penalties were calculated using the Department's "Guidelines for characterizing RCRA violations" and are in accordance with Department policy. The guideline violation followed was record keeping.

Part I

1. Potential for Harm: The facility failed to maintain written documentation, including all the required information, of all hazardous waste entering and leaving the facility. Copies of manifests are maintained on-site and waste is not stored on-site for greater than 10 days. Therefore, a Moderate potential for harm is warranted.

2. Extent of Deviation: No operating log was kept including the date the waste enters the facility and the date waste leaves the facility, therefore, a Moderate extent of deviation is warranted.