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Florida Department of Environmental Protection Hazardous Waste Inspection Report

#### FACILITY INFORMATION:

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Facility Name: Micro	Matic USA	Inc			
<b>On-Site Inspection Sta</b>	rt Date:	12/10/2018	<b>On-Site Ins</b>	spection End Date:	12/10/2018
ME ID#: 92147			EPA ID#:	FLR000194654	
Facility Street Address	<b>s:</b> 2386	Simon Ct, Brooks	ville, FL 346	604	
Contact Mailing Addre	<b>ss:</b> 2386	Simon Ct, Brooks	ville, FL 346	604	
County Name: Herna	ando				
NOTIFIED AS:					
LQG (>1000 kg/month)					
INSPECTION TYPE:					
Routine Inspection for L	QG (>1000 l	kg/month) facility			
INSPECTION PARTICI	PANTS:				
Principal Inspector: Al	bigail B Brido	ges, Environmenta	I Specialist I		
Other Participants: El	lizabeth Kna pecialist I; Je	uss, Environmenta eff Crowell, Engine	al Consultant ering Manag	;; Shannon Lenhart, Environ jer	mental
LATITUDE / LONGITUI	DE: Lat	28° 28' 9.051" / L	ong 82° 28' 2	24.5265"	
SIC CODE: 3499 - 1	Manufacturir	ng - fabricated met	al products,	nec	
TYPE OF OWNERSHIP	P: Pr	ivate			

#### Introduction:

Micro Matic USA, Inc. (Micro Matic) was inspected on December 10, 2018 to evaluate its compliance with state and federal regulations for Large Quantity Generators of Hazardous Waste. The inspectors were accompanied throughout the inspection by Jeff Crowell, Engineering Manager. In August 2018, this facility notified as a Large Quantity Generator. The facility was previously inspected by the Florida Department of Environmental Protection (Department) and the Environmental Protection Agency (EPA) on May 1, 2014, and this inspection resulted in a federal Consent Agreement and Final Order as a result of the nature of the violations noted in the inspection.

The facility has approximately 130 employees, and the facility's hours of operation are Monday through Friday from 8AM to 4:30PM. Micro Matic is on municipal water and sewer.

#### **Process Description:**

Micro Matic manufactures beverage dispensing equipment, such as beer and wine taps, from stainless steel and plastic components. The manufacturing process has not changed since the 2014 inspection. Metal parts are machined, finished, and assembled. Plastic parts are formed by injection molding or cutting hose stock to size. Parts are assembled by welding and other standard assembly processes. The facility does not paint parts.

Hazardous waste is generated during the metal surface finishing operations of stainless steel parts. Caustic degreasing is done with Daraclean 200, which is a potassium hydroxide solution, followed by a rinse in deionized water. The passivation lines use a passivation tank with Nitric Acid, followed by two rinse tanks containing DI water. Products are then placed in a "Pickling Tank" containing a hydrofluoric and nitric acid deoxidizer called Oakite Deoxidizer, and then dunked in three additional DI rinse tanks. The processing tanks were all in secondary containment. Deionized water is produced on site. Rinse waters are treated in the unit. Safety Data Sheets for the process chemicals were available for inspection. A small heated dryer is used after the final DI rinses. Countercurrent rinsing is used to minimize water use.

The facility does not discharge the process waste water to the sewer, and the facility does not have a

Page 2 of 12

Inspection Date: 12/10/2018

pretreatment permit. The final rinse from each process is treated on site in a tank system that includes overhead influent piping from the process area, to an above ground, 240-gallon plastic storage tank. The collected rinse water is transferred to an evaporator to be concentrated before disposal, and the evaporator sludge is cleaned out every 3 to 6 months. Both the tank and evaporator were labeled with the words "hazardous waste." However, the facility was not removing the treated waste from the system at least once every 90 days in order to comply accumulation time limits, or keeping an inventory log to document that the waste flows completely through the tank system every 90 days. This violation was a repeat violation from the 2014 Inspection. The system is located within secondary containment, except for the above ground piping which is exempt from secondary containment requirements if inspected for leaks on a daily basis. The facility was also not in compliance with the inspection requirements, as tank Inspection logs were only available for review from Oct. 2, 2018 to Dec. 10, 2018. The daily tank inspection logs must be maintained for a minimum of three years.

In the Central Accumulation Area, located in the same area as the hazardous waste tank and evaporator, there were many drums. All of which were empty, except for two. One of the two drums contained glycol. Despite having a hazardous waste label and being marked with an accumulation start date of Nov. 15, 2018, Mr. Crowell stated that the glycol was used as a coolant and it is reused as needed. The other drum was labeled as hazardous waste and the contents were described as cutting fluid, a mixture of water and a soluble oil. Mr. Crowell stated that evaporator sludge is mixed in with the used machine oil water. This drum had an accumulation start date of Nov. 27, 2018.

Emergency equipment, such as eye-wash stations and fire extinguishers, is available in the areas of operations. The fire extinguishers are maintained annually. During a review of the Contingency Plan, it was observed that the names and contact information of the emergency coordinators had not been updated. At the time of the inspection, the facility was unable to provide documentation to confirm that an attempt to make arrangements with authorities and emergency services had been made. Generators must retain documentation that an attempt to make arrangements with State or local authorities was made.

During the inspection, manifests were reviewed. All the manifests that were available for review were initial copies. Micro Matic did not retain completed copies of signed, returned manifests, and therefore the Department was not able to verify that the facility was in compliance with the requirement for exception reporting. If the generator does not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, the generator must file an exception report.

Training records for 2016 were available for review, however records for 2017 and 2018 were not available for review at the time of the inspection. Department inspectors were informed that the 2018 hazardous waste training had not yet been conducted, but the facility would schedule the training soon. Facility personnel must successfully complete a hazardous waste safety and management training within six months of being hired into a position that require them to handle hazardous waste, and this training must be reviewed annually. The training records for current employees must be kept until the closure of the facility. This is a repeat violation from the 2014 inspection.

### New Potential Violations and Areas of Concern:

#### Violations

Туре:	Violation
Rule:	262.17(a)(7)
Question Number:	4.69
Question:	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 262.17(a)(7)
Explanation:	As per 40 CFR 262.17(a)(7), facility personnel must successfully complete a hazardous waste safety and management training within six months of being hired into a position that require them to handle hazardous waste, and this training must be reviewed annually. The training records for current employees must be kept until the closure of the facility. At the time of the inspection, training records for 2016 were available for review, but records for 2017 were not available for review, and training had not been conducted for 2018.

Corrective Action: Hazardous waste training for 2018 shall be submitted to the Department for review.

Туре:	Violation
Rule:	262.17(a), 262.17(a)(5)(ii)(C), 262.17(a)(5)(ii)(D)
Explanation:	40 CFR 262.17(a)(5)(ii)(C): Facility must use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank if using a batch process, or in the case of a tank with a continuous flow process, demonstrate that estimated volumes of hazardous waste entering the tank daily exit the tank within 90 days of first entering
	40 CFR 262.17(a)(5)(ii)(D): Facility must keep inventory logs or records with the above information on site and readily available for inspection.
Corrective Action:	Micro Matic must either empty the hazardous waste tank out every 90 days in order to comply accumulation time limits, or keep an inventory log to document that the waste flows completely through the tank system every 90 days. Inventory logs must be documented, and records must be maintained for a minimum of three years.
Туре:	Violation
Rule:	262.256(a), 262.256(b)
Explanation:	262.256(a): Failure of the facility to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements.
	40 CFR 262.256(b): Failure of the facility to maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency. This documentation must include documentation in the operating record that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.
Corrective Action:	The facility must submit confirmation that an attempt was made to make arrangements with authorities and emergency services.
Туре:	Violation
Rule:	262.40(a)
Explanation:	A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. At the time of the inspection, the facility was unable to produce the final signed manifests for January 2016 through May 2018; however, the initial generator copies were available. No exception reports were filed per 40 CFR 262.42.
Corrective Action:	The facility must ensure that a final signed copy of each manifest is received from the designated facility within 35 days (see 40 CFR 262.42) and that each final signed manifest is kept on site for at least three years. Facility shall immediately contact the destination facility and request copies of the final signed manifests for January 2016 thru May 2018, and then submit the manifests to the Department for review.

Туре:	Violation
Rule:	262.17(a)
Explanation:	The generator stored hazardous waste for greater than 90 days without applying for, and receiving, a RCRA permit. During the inspection, it was observed that Micro Matic had stored hazardous waste in the facility's hazardous waste tank system for more than 90 days. This is a repeat violation from the 2014 inspection
Corrective Action:	The facility must ensure that waste is not stored on site for more than 90 days.
Туре:	Violation
Rule:	262.263(d)
Explanation:	Failure of a generator to review and immediately amend a contingency plan when the list of emergency coordinators changes.
Corrective Action:	The facility must update their Contingency Plan with the new emergency coordinators and submit the updated Contingency Plan to the Department.
Туре:	Violation
Rule:	265.195(b), 265.195(e), 265.195(g)
Explanation:	40 CFR 265.195(b): Failure of a generator to perform daily inspects of the tank system, including above ground piping that is not within secondary containment, at least once each operating day.
	40 CFR 265.195(g): Failure to document the required daily inspections in the operating log; failure to retain such records for a minimum of 3 years.
Corrective Action:	Facility must immediately begin conduct and document daily inspections of the tank system, including any ancillary equipment not in secondary containment, every operating day and records of these inspections must be retained for a minimum of 3 years. Facility shall submit at least two months of daily inspection records to the Department for review.

## PHOTO ATTACHMENTS:

### Hazardous Waste Tank



### Hazardous Waste Drums



Micro Matic USA Inc Inspection Report Inspection Date: 12/10/2018

#### **Conclusion:**

Based on the observations made at the time of this inspection, the facility was not operating in compliance with state an federal hazardous waste rules\* and regulations applicable to Large Quantity Generators of Hazardous Waste.

\*Please note that Florida adopted the Generator Improvements Rule on June 18, 2018

### 1.0 - Pre-Inspection 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.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	<		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			~
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	~		

### 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.

ltem 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)			>
ltem 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)			>
ltem 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	ĺ	ĺ	
	Item 3. Emergency Response Phone Number	ĺ	ĺ	
	Item 4. Manifest Tracking Number	~	ĺ	
	Item 5. Generator's Mailing Address, Phone Number and Site Address		ĺ	
	Item 6. Transporter 1 Company Name & U.S. EPA ID Number	Í		
	Item 7. Transporter 2 Company Name & U.S. EPA ID Number	Í		

ltem No.	The Manifest	Yes	No	N/A
	Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID			
	<ul> <li>Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group.</li> <li>Item 10. Containers (Number and Type)</li> </ul>			
	<ul> <li>Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates)</li> <li>Item 12. Units of Measure (Weight/Volume)</li> </ul>			
	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			
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste	~		
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	~		
4.25	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest	~		
4.26	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the			~
4.27	signed and dated manifest to the Designated Facility? 262.23(c) For rail shipments originating at the site of generation did the generator provide at least 3 signed and			<b>-</b>
	dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) The next non-rail transporter?			2
	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	Pre Transport Requirements	Yes	No	N/A
4.35	Before transporting or offering hazardous waste for transport off-site, did the generator package the	0		
4.36	waste in accordance with 49 CFR parts 173, 178, and 179? 262.30 Before transporting or offering hazardous waste for transport off-site, did the generator label each			
4.37	package in accordance with 49 CFR part 172? 262.31 Before transporting or offering hazardous waste for transport off-site, did the generator mark each			
4.38	package in accordance with 49 CFR part 172? 262.32(a) 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)	5.1		
		~		
	Vianitest i racking number?			

ltem No.	Pre Transport Requirements	Yes	No	N/A
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	<		
ltem 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(a)(8)(iii)? 262.17(a)(8)(iii)			~
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 the accumulation start date is visible for inspection on each hazardous waste container? $262.17(a)(5)(i)(C)$	<		
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"? 262.15(a)(5)			>
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.)			
4.56	If YES, within 3 days did the generator mark an accumulation start date on the excess waste container? $262.17(a)(5)(i)(C)$			~
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? $262.17(a)(5)(i)(A)$			~
ltem 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	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.17(a)(1)(iv)(A)	٢		
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)	٢		
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			

ltem No.	Use and Management of Containers	Yes	No	N/A
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)			~
ltem 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)		>	
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 $2.62 \cdot 17(a)(7)$			>
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)			>
ltem 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(h)			>
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			~
ltem 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			~

Inspection Date: 12/10/2018

#### 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.

Abigali B Bridges	Environmental Specialist I	
Principal Inspector Name	Principal Inspector Title	
Abigai Budges	FDEP-SWD	01/29/2019
Principal Inspector Signature	Organization	Date
Elizabeth Knauss	Environmental Consultant	
Inspector Name	Inspector Title	
	FDEP-SWD	
	Organization	
Shannon Lenhart	Environmental Specialist I	
Inspector Name	Inspector Title	
	FDEP-SWD	
	Organization	
Jeff Crowell	Engineering Manager	
Representative Name	Representative Title	
	Micro Matic USA, Inc.	

Violations" or areas of concern.

#### **Report Approvers:**

Approver: Shannon Kennedy

**Inspection Approval Date:** 01/29/2019