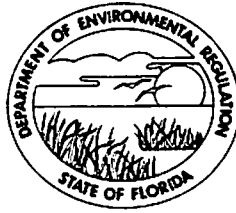


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STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION



CENTRAL FLORIDA DISTRICT

3319 MAGUIRE BOULEVARD
SUITE 232
ORLANDO, FLORIDA 32803-3767

BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ALEX ALEXANDER
DISTRICT MANAGER

March 29, 1988

A.R. Paquette & Company
2195 Quava Street
Glenwood, Florida 32722
Attn: Allen Paquette

OCF-HW-88-0109

Volusia County - HW
A.R. Paquette and Co.
FLD 982 105 884

Dear Mr. Paquette:

An inspection on March 22, 1988 was made to determine whether your company is in compliance with rules of State of Florida, Chapter 17-30, Part III, Standards for Generators and Transporters of Hazardous Waste and Owners and Operators of Hazardous Waste Facilities. The attached report, RCRA Compliance Inspection Report, indicates that at this time the hazardous waste classification of your facility is a transporter and is in compliance.

If you have any questions, please contact the inspector, Laxsamee Levin at 305/894-7555.

Sincerely,

Richard Tedder, P.E., Supervisor
Hazardous Waste Section

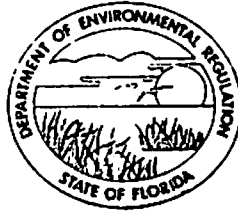
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Enclosure

cc: Don Trussell, DER Tallahassee

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HAZARDOUS WASTE INSPECTION REPORT

1. Inspection Report Complaint Routine Follow-up Permitting
Facility Name A.R. Paquette + Co. DER/EPA ID FLD 982105884
Address 310 N. Harris Street Deland Florida 32724
County Volusia Phone (904) 736-1978 Date 3-23-88 Time 10:00 a.m.

TYPE OF FACILITY

- | | | |
|---|---|--|
| Generator <input type="checkbox"/> Small Quantity <input type="checkbox"/> Generator <input type="checkbox"/> Cond. Exempt SQG | Storage <input type="checkbox"/> Container <input type="checkbox"/> Tank <input type="checkbox"/> Waste Pile <input type="checkbox"/> Surface Impoundment | Treatment <input type="checkbox"/> Tank <input type="checkbox"/> Land Treatment <input type="checkbox"/> Thermal <input type="checkbox"/> Chem/Phys/Bio. <input type="checkbox"/> Incinerator <input type="checkbox"/> Surface Impoundment |
| Transporter <input checked="" type="checkbox"/> Transporter | Disposal <input type="checkbox"/> Landfill <input type="checkbox"/> Surface Impoundment <input type="checkbox"/> Waste Pile | |

2. Applicable Regulations:

40 CFR 261.5 40 CFR 262 40 CFR 263 40 CFR 264 40 CFR 265
and 17-30.170 F.A.C.

3. Responsible Official: (Name & Title)

Allen Paquette - President

4. Survey Participants & Principal Inspector

Allen Paquette
Laxsabee Levin (FDER)

5. Facility Latitude:

Longitude

6. Type of Ownership: Federal State County Municipal Private

7. Permit Number: N/A Date Issued: _____ Expiration Date: _____

8. Discrepancies with Process Description; if different from previous report.

None

9. List and Explain Noncompliance Items.

None

Narrative

I. Introduction

On March 22, 1988 Laxsamee Levin (FDER) accompanied by Allen Paquette, President of A.R. Paquette & Co. inspected the company for compliance with hazardous waste transporter standards (40 CFR Part 263 and 17-30.170 F.A.C.). A.R. Paquette & Co. is a hazardous waste transporter and subcontractor for Hazardous Waste Consultants, Inc. The business has been established since February 1987 and has two employees.

The facility has not been inspected before.

II. Current Process Description

As stated earlier, A.R. Paquette & Co. works solely for Hazardous Waste Consultants, Inc. (HWC). HWC is another hazardous waste transporter and operates a transfer facility located in the city of Orlando. A.R. Paquette & Co. owns a licensed vehicle/truck. The truck consists of a tractor and trailer and has Florida license plates of A38 31F and AF 961X, respectively. The truck is used for transportation of hazardous waste drums from HWC directly to disposal and recycling facilities. During the non-transportation periods, the truck is parked in an industrial truck parking area located at 115 Old Daytona Road, Deland, Florida 32724. A.R. Paquette & Co. does not operate a hazardous waste transfer facility.

III. Waste Streams

A.R. Paquette & Co. is a hazardous waste transporter and does not generate hazardous waste due to the nature of its business.

IV. Waste Management Practices

A.R. Paquette & Co. picks up hazardous waste drums from HWC and directly transports them to disposal or recycling facilities.

Disposal and Recycling Facilities are:

Allworth, Inc.
Cecos International
Marine Shale Processors, Inc.
GSX Services
Dow Chemical
SolidTex Systems, Inc.

Birmingham, Alabama
Livingston, Louisiana
Morgan City, Louisiana
Pinewood, South Carolina
Plaquemine, Louisiana
Morrow, Georgia

A.R. Paquette & Co.
March 31, 1988
Page Four

V. Inspection

A.R. Paquette & Co. was inspected on March 22, 1988 as a hazardous waste transporter. A transporter financial responsibility insurance was presented to the inspector and a copy of the insurance statement was provided to the inspector. Manifests were randomly reviewed by the inspector. The licensed vehicle/truck was inspected and there were not any hazardous waste drums in the vehicle.

A.R. Paquette & Co. is in compliance with their financial insurance requirement. There was no discrepancy noted during the manifest review. There were not any violations noted during the inspection of the truck.

VI. Conclusion

Upon conclusion of the inspection a debrief was conducted with Mr. Allen Paquette, President of the Company. A.R. Paquette & Co. is a transporter and was in compliance at the time of inspection.

Date March 22, 1988
Inspector L. LEVIN
Facility ID# FLD 982105884

TRANSPORTERS CHECKLIST

Central Florida District

I. SITE NAME: A.R. PAQUETTE + COMPANY

II. TRANSPORTER REQUIREMENTS (40 CFR 263)

- 1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500) Yes No
- 2. Does transporter have an EPA identification number? (263.11(a)) Yes No
- 3. Does transporter comply with 10 day storage limit for transfer facilities? (263.12) Yes No *NA does not operate a transfer facility*
- a. Is the hazardous waste packaged according to 262.30? (263.12) Yes No
- 4. Does the transporter use manifest system as required by 263.20? Yes No

Do the manifests contain at least:

- a. Name and address of transporter? Yes No
- b. Name, address, identification code of generator? Yes No
- c. Name, address, identification code of designated permitted facility? Yes No
- d. Corresponding manifest document number? Yes No
- e. Description and quantity of each hazardous waste? Yes No
- f. Signature of subsequent transporters? Yes No
- g. Signatures signifying proper delivery or reasons why delivery could not be certified? Yes No

5. International shipments: (263.20(g))

N/A

- a. Record of date waste left U.S.?
- b. Presence of one signed copy in records?
- c. Signed copy of manifest returned to the generator?
- d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States?

Yes No
 Yes No
 Yes No
 Yes No

6. Are copies of the manifest retained for 3 years? (262.22)

NA has business less than 3 yr.
 Yes No

7. Is there evidence of discharge of hazardous waste? (263.30)

NA Yes No

8. Has transporter demonstrated the financial responsibility required under 17-30.170(2)?

Copy attached.
 Yes No

III. TRANSFER FACILITY REQUIREMENTS (17-30.171) NA

A. General Facility Standards (265 Subpart B)

1. Security (265.14)

- a. Is the facility security system adequate to minimize unauthorized entry?
- b. Are signs posted and legible for 25 feet?

Yes No
 Yes No

2. Inspection Requirement (265.15)

- a. Does the facility have a copy of the Inspection Plan?
- b. Does the facility have completed inspection logs?
- c. Were the deficiencies corrected in a timely manner?
- d. Are the inspection logs maintained at the facility for 3 years?

Yes No
 Yes No
 Yes No
 Yes No

3. Personnel Training (265.16)

- a. Do management personnel complete hazardous waste training?
 - Is training on-the-job?
 - Is training in-the-classroom?

Yes No
 Yes No
 Yes No