

1. Type: Violation

Rule: 264.71(a)(1)

Explanation: If a facility receives hazardous waste accompanied by a manifest, the owner, operator

or his/her agent must sign and date the manifest as indicated in paragraph (a)(2) of this section to certify that the hazardous waste covered by the manifest was received, that the hazardous waste was received except as noted in the discrepancy space of the manifest, or that the hazardous waste was rejected as noted in the manifest discrepancy space. Specifically, AERC, as the designated facility did not sign manifest

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**Corrective Action: Mike and Christian to take online 8-hour DOT refresher.
Mike and Christian to train drivers and warehouse employees on HW Manifests
Procedure will be one person author the documents and a separate to sign off**

2. Type: Violation

Rule: 264.75

Explanation: Biennial report. The owner or operator must prepare and submit a single copy of a biennial report to the Regional Administrator by March 1 of each even numbered year.

The biennial report must be submitted on EPA form 8700-13B. Specifically, AERC did not submit the biennial report until July.

**Corrective Action: This corrective action was completed when the Department received the report on July16, 2012.
Assign resource to continuously gather information for this report on a monthly basis EPA form 8700-13B
Place an action item on the corporate compliance calendar to ensure**

3. Type: Violation

Rule: 403.727(1)(c)

Explanation: 62-737.800(9) and 264.1- Failure to comply with permit condition Part I-General and Standard Conditions. Specifically, AERC stated in their permit application that they would limit storage of drums 1 or 2 high (no higher than 9 feet). Additionally, AERC stored universal waste in an area that was reserved for supplies.

Corrective Action:

**9' pipe created to ensure pallets are within range
Visual signage will be created and mounted in the warehouse for height limits.
Sign placed in supply storage area "No Universal Waste Storage"**

4. Type: Violation

Rule: 62-737.800(9)

Explanation: Owners and operators shall store processed and unprocessed materials in closed containers; and for broken or damaged unprocessed lamps and devices, and residuals, store these in closed, covered and sealed containers or in enclosed areas of the facility conforming to paragraph 62-296.417(1), F.A.C., to prevent mercury emissions. Specifically, AERC was storing bulbs in open containers and had not completely covered the roll off dumpster of glass.

Corrective Action: AERC has reviewed the importance of keeping all containers closed with employees that are stored on the warehouse floor.

5. Type: Violation

Rule: 262.20(a)(1)

Explanation: A generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, or a treatment, storage, and disposal facility who offers for transport a rejected hazardous waste load, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22. Specifically, as a co-generator, AERC prepared three hazardous waste manifests for Southern Carolina that did not contain an EPA identification number.

Corrective Action: Please see corrective actions listed item # 1