



**Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report**

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**FACILITY INFORMATION:**

**Facility Name:** FPL Port West Properties

**On-Site Inspection Start Date:** 06/05/2018

**On-Site Inspection End Date:** 06/05/2018

**ME ID#:** 9966

**EPA ID#:** FLD000807792

**Facility Street Address:** 2455 Port West Blvd, Riviera Beach, FL 33407-1214

**Contact Mailing Address:** 2455 Port West Blvd, Riviera Beach, FL 33407-1214

**County Name:** Palm Beach

**Contact Phone:** (561) 845-4973

**NOTIFIED AS:**

LQG (>1000 kg/month)

Used Oil

**INSPECTION TYPE:**

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Kayla Acosta, Inspector

Other Participants: Tony Cevallos, Environmental Specialist

**LATITUDE / LONGITUDE:** Lat 26° 46' 6.5018" / Long 80° 6' 5.0991"

**SIC CODE:** 4931 - Trans. & utilities - electric and other services combined

**TYPE OF OWNERSHIP:** Private

**Introduction:**

A Compliance Evaluation Inspection (CEI) was conducted on FPL Port West Properties on 06/05/2018 by ES I inspector Kayla Acosta. FPL Port West was represented by Tony Cevallos, Environmental Technician. FPL Port West (FPL) is a supply distributor and waste consolidating facility for FPL substations, service centers, and power plants. The facility is approximately 170 acres or 7,405,200 square feet in size. The facility also runs on city water and sewer and has a total of 300 employees and 2 employees specifically in waste.

**Notification History:**

Notified as Large Quantity Generator (LQG): 11/26/1996

Notified as Used Oil Transporter: 05/15/1992

Notified as Used Oil Transfer Facility: 05/29/2009

Their current registration is active for: Used Oil Transporter/ Used Oil Transfer Facility (expiration date: 06/30/2019). Their latest notification as a Large Quantity Generator of Hazardous Waste was on 03/12/2018.

**Inspection History:**

The facility was last inspected on 05/16/2013. No violations were observed.

PPE was required to enter this facility. Department personnel was equipped with steel toe boots and safety glasses.

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### Process Description:

FPL Port West (FPL), is a supply distributor and waste consolidating facility. Conditionally Exempt Small Quantity Generator (CESQG) waste from FPL substations, service centers, and power plants are divided into three categories: RCRA regulated waste (hazardous waste), universal waste, and non-RCRA regulated waste. FPL conducts their own TCLP and PCB analysis at their FPL Central Lab facility in West Palm Beach. As a result of the operations conducted at this facility, the following wastes are generated: paint-related waste and spent aerosol cans (EPA waste code D001), PCB soil debris and PCB lab wastes from unknown transformers, non-PCB capacitors, corrosive waste (EPA waste code D002), reactive waste (EPA waste code D003), used mineral oil, universal waste batteries, and universal waste spent mercury lamps.

The inspector toured the facility's hazardous waste generation points with Mr. Cevallos, and reviewed hazardous waste and used oil disposal practiced. The following areas were inspected: Building C: Regulated Material Facility, Structure J: Oil Transfer Facility, Building A: Used Mineral Oil >50 PPM <499 PPM, Building K: Fabrication, Refurbishing, and Lighting Shop, and Building G: Automotive.

#### Building C: Regulated Material Facility/ 90 Day Hazardous Waste Storage

This building is the central receiving and accumulation area for universal waste, hazardous waste, and non-RCRA regulated waste. There is a separate 90-day storage area for hazardous waste as well as a satellite accumulation area for hazardous waste. This building is equipped with a shower station and fire control devices. The inspector observed:

##### Universal Waste:

- > (6) Six cardboard boxes closed and labeled "Spent Mercury Containing Lamps for Recycling" with start accumulation dates: 5/29/18, 5/23/18, 5/22/18, 6/04/18
- > (2) Two 55-gallon drums closed and labeled "Spent Mercury Containing Lamps for Recycling" with start accumulation dates: 5/26/18 and 3/30/18
- > (1) One 5-gallon closed container labeled "Used Batteries for Recycling" with start accumulation date 4/16/18
- > (1) One 5-gallon closed container labeled "Spent Mercury Containing Devices for Recycling" with start accumulation date 7/27/17

##### Satellite Accumulation Area:

- > (1) One 55-gallon satellite drum, closed and labeled "Hazardous Waste Paint-Related Material"

##### 90-Day Hazardous Waste Storage Area:

7 drums were observed with adequate aisle space, container management, and emergency contacts, phone, and evacuation map close by.

- > (4) Four 55-gallon closed drums labeled Hazardous Waste D001 Aerosols with start accumulation dates: 5/29/18, 06/1/18, 6/4/18
- > (1) One 55-gallon closed drum labeled Hazardous Waste Solid D006-D008 "Pending TCLP Analysis" with start accumulation dates: 5/20/18
- >(2) Two 55-gallon closed drums labeled Non-Hazardous Waste: Expired Products with Safety Data Sheets attached to demonstrate the expired products are non-hazardous

#### Structure J: Oil Transfer Facility

Mineral Oil is recovered from transformers that are taken down and are put out of service. At the scene they are determined to contain non-PCB or PCB mineral oil by the use of Chlor D-Tek halogen screening and additional analytical tests are conducted at FPL Central Lab. Most transformers contain non-PCB mineral oil which contains less than 50 PPM. The Used Oil transfer facility stores used mineral oil for less than 35 days which was demonstrated during the record review. The inspector observed:

- > (1) One double-walled 10,000 gallon capacity tank labeled Used Mineral Oil less than 50PPM.

The double-walled tank is contained within Structure J which was built with a secondary containment cement barrier and built-in sump. The storage tank registration and Used Oil Transporter/ Transfer facility registration was posted on the side of the double-walled tank for display. A spill response kit and a fire extinguisher were located within structure J, along with spill response procedures.

#### Building A: Used Mineral Oil >50 PPM <499 PPM

This building stores a 6000 gallon capacity tank which contains used mineral oil that has a halogen level (PPM) greater than 50 but less than 499 PPM. This tank is situated within a cement secondary contain

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structure that can hold 110% of the used mineral oil in the tank. This building is also equipped with fire control, eye shower station, and spill response equipment

#### Building K: Fabrication Refurbishing, and Lighting Shop

This building is used for repairing power grid parts, refurbishing, and is a supply area for lighting parts.

Building K is equipped with a paint booth. Paint booth filters are changed twice a year and TCLP tested at FPL's laboratory prior to being disposed of. There is also a bead blast machine and spent blast media is also TCLP tested for proper waste disposal. The inspector observed:

> (1) One 55 gallon drum, closed and labeled spent mercury containing lamps with start accumulation date 03/27/18

> (1) One 55 gallon satellite drum, closed and labeled hazardous waste aerosol cans

#### Building G: Automotive

FPL has their own fleet management facility equipped with five bay areas where they service company vehicles. Used antifreeze, used oil, and used oil filters generated from vehicle servicing here is picked-up by Heritage - Crystal Clean (EPA ID ILR000130062) and sent to their processing facility in Pompano Beach (EPA ID FLD984262410). Used oil rags are sent to be laundered at UniFirst. The building is equipped with a spill response carts, eye wash stations, and fire extinguishers. The inspector observed:

> (1) One 55-gallon drum of used coolant, closed and properly labeled

> (1) One 55-gallon drum of used oil absorbent pads, closed and properly labeled

> (2) Two 55-gallon satellite drums of used aerosol cans, closed and labeled hazardous waste

> (1) One 55-gallon drum of used oil filters, closed and properly labeled

> (1) One 300-gallon double walled Used Oil storage tank, closed and properly labeled

> (2) Two 30-gallon Used Oil Caddy properly labeled Used Oil

#### LQG Standards Implemented Onsite:

>Employee Training records - All employees that handle hazardous waste and used oil receive initial and annual training including Hazwoper training, used oil and hazardous waste management, proper disposal and cleanup of spills. Mr. Cevallos also completed the annual LQG Workshop on 01/18/2018 and conducts his own in-house LQG training for staff. Last documented training of facility employees was dated 05/09/2018.

>Full Contingency Plan (FCP) and Spill Prevention, Control and Countermeasure (SPCC) Plan - the facility had a hardcopy of their current Hazardous Waste Contingency Plan dated 06/20/2017 and a separate SPCC & Oil Spill Contingency Plan available during the inspection. The FCP included Mr. Cevallos as the Emergency coordinator with contact information and other emergency contacts, evacuation maps with the location of the hazardous waste storage area, waste minimization plan, explosion and fire scenarios, and emergency response arrangements with local authorities: Certified mail receipts for West Palm Beach Fire Department, Riviera Beach Fire Department, Riviera Beach Police Department, West Palm Beach Police, and St. Mary's Hospital.

>Weekly Inspection Log - The facility keeps a binder for weekly and monthly inspections of tanks and hazardous waste containers. Hazardous waste containers and universal waste containers are inspected every Friday. Last container inspection was on 06/01/2018.

>Biennial Report - The facility submitted a biennial report notification to the Department's Division of Waste Management stating that for 2017 the hazardous waste generated at the facility was below the LQG threshold of 1000 kg per month. Therefore, in accordance with 62-730.160(4) F.A.C. a biennial report is not required if hazardous waste generation does not exceed 1,000 kg per month.

>Preparedness and Prevention: During the inspection, the inspector observed several fire extinguishers within each building throughout the facility. Near to the designated hazardous waste area, there was an eye shower area and spill kits available. Evacuation route maps and proper internal communication systems were displayed and were in place in case of an emergency, including emergency contacts.

The facility uses one (1) truck for used mineral oil transport.

> One (1) - 2,000 gallon capacity FPL Oil Tanker. DOT placards were displayed (US DOT# 413426FL) on the side of the tanker. Transporters keep copies of the permits, notifications, contingency plan (in case of emergency) and manifests on the truck. The transporter is also equipped with a spill response kit and fire extinguisher.

#### Record Review:

- Hazardous Waste and Universal Waste:

1) The facility is compliant with the 90-day accumulation timeframe and ships out hazardous waste every 4-6 weeks. Last shipment was on 4/25/18 and was 455 kilograms or 1003 pounds of hazardous waste (below

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LQG amounts).

2) Hazardous Waste Transporters: Transporter 1 is Veolia ES Technical Solutions (EPA ID NJD080631369). Transporter 2 is Freehold Cartage Inc. (EPA ID NJD054126164). The designated facility is Veolia ES Technical Solutions, LLC. (EPA ID TXD000838896) located in Port Arthur, Texas.

3) Aside from the hazardous waste manifests, FPL keeps a daily receipt log for incoming hazardous waste and waste generated onsite which shows the weight of the waste, demonstrating that the facility had not gone over the 1000 kilograms per month which would trigger biennial reporting.

4) Lead acid batteries are sent to Sanders Lead Company Inc. in Troy Alabama for recycling. Bill of lading were available for review.

5) Universal waste lamps and batteries are picked up by Veolia ES Technical Solutions (EPA ID NJD080631369) and sent to Veolia ES Technical Solutions in Tallahassee, FL (EPA ID FL0000207449).

- Used Mineral Oil from Transformers

1) Used Oil Transport, acceptance logs, and shipping records from FPL substations and service centers were available for review at the time of inspection for the last 3 years. The facility was using an equivalent form [62-710.901(2)]. Each acceptance and delivery records comply with the requirements described in 40 CFR part 279.46, including generator EPA ID numbers from the FPL substations and service centers. Non-hazardous waste manifests were available for review for used oil. The second used oil transporter is Orlando Industrial Contractors, Inc. (EPA ID FLR000220392) and the designated facility is Theta America Group LLC (EPA ID FLR000220202) who markets the used oil.

2) Used oil greater than 50 PPM and less than 500 PPM is picked up by Clean Harbors Environmental Services (EPA ID MAD039322250) and sent to their Clean Harbors facility in Tucker, Georgia (EPA ID GAD980839187).

3) Insurance Liability - The facility provided the Department a letter of self-insurance provided and certified by FPL's Chief Financial Officer John Ketchum and supports the use of provision 62-710.600(2)(e)(b) F.A.C. for automobile liability and pollution liability in the amount of \$1,000,000 dated 01/03/2018.

4) Acceptance and delivery records and inspection logs for the used mineral oil tank demonstrate the transfer facility complies with the less than 35-day storage requirements.

5) Halogen Screening Procedure - The facility uses Chlor D-Tek for the testing of used oil halogen content on transformers. Additional testing for PCB's is conducted at FPL's Central Laboratory property. Documentation was provided.

6) The facility provided an Oil Spill Contingency/ SPCC Plan which contained emergency contacts, emergency response strategy and reporting, spill control actions, spill control equipment, and discharge notification procedures.

7) Permits - The facilities storage tank registration, and used oil transporter/ transfer facility registrations were on display. Used Oil registrations and storage tank registrations expire on 06/30/2019.

8) Annual Reporting - The facility is exempt from record keeping and reporting requirements as cited in 62-710.510(3). A generator of used oil that transports only its own used oil generated at its own non-contiguous operations to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter is not subject to the record keeping and reporting requirements of this section.

Used Oil Records from Fleet Garage:

1) Used oil rags are sent to be laundered at UniFirst Corporation in Pompano Beach, FL. Payment receipts were available for review. Last laundry pick-up 05/29/18.

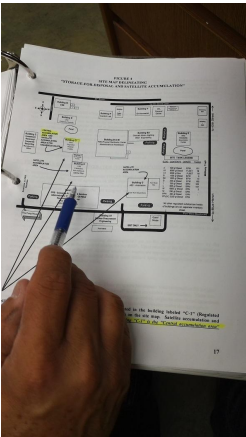
2) Used batteries are picked up by the distributor in exchange for new vehicle batteries by Rechten International Trucks. Last pick-up 06/01/18.

3) Used antifreeze, used oil filters, and used oil from vehicles are picked up by Heritage - Crystal Clean, LLC and sent to their used oil processing facility in Pompano Beach, FL (EPA ID FLD984262410).

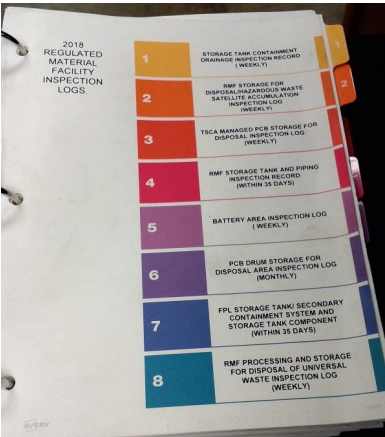
- Training: Training logs for used oil and hazardous waste training (conducted annually) for the last 3 years were reviewed and appeared to be in order. Last training was conducted in 05/09/2018.

**PHOTO ATTACHMENTS:**

Site Map



Inspection Log Book



Universal Waste: Spent Mercury Containing Lamps



Emergency Shower Station



HW Satellite Container



HW 90-Day Accumulation Area



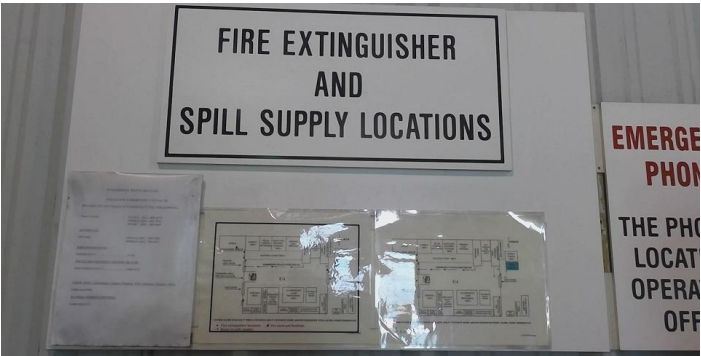


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HW Labels Correctly Filled



Emergency Contacts and Evac Map



Used Mineral Oil Double-Walled Tank



Spill Control Equipment



Fleet Garage



UO Storage Tank in Fleet Garage



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Aerosol Cans Satellite Container



UO Absorbent Container



### Conclusion:

FPL Port West operates as a Large Quantity Generator, a used oil transporter, and used oil transfer facility. The facility was in compliance with state and federal hazardous waste and used oil regulations.

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**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? 262.12(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), 62-730.240(1)	✓		
Item No.	40 CFR Part 268 -- 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 chooses 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.	40 CFR 262 Subpart B -- 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) <input type="checkbox"/> Item 1. Generator's U.S. EPA Identification Number <input type="checkbox"/> Item 2. Page 1 of "X" (total number of pages used to complete the manifest) <input type="checkbox"/> Item 3. Emergency Response Phone Number <input type="checkbox"/> Item 4. Manifest Tracking Number <input type="checkbox"/> Item 5. Generator's Mailing Address, Phone Number and Site Address <input type="checkbox"/> Item 6. Transporter 1 Company Name & U.S. EPA ID Number <input type="checkbox"/> Item 7. Transporter 2 Company Name & U.S. EPA ID Number	✓		



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Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A
	<input type="checkbox"/> Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number <input type="checkbox"/> Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group) <input type="checkbox"/> Item 10. Containers (Number and Type) <input type="checkbox"/> Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates) <input type="checkbox"/> Item 12. Units of Measure (Weight/Volume) <input type="checkbox"/> Item 13. Waste Codes. Enter up to 6 of the most representative waste codes. <input type="checkbox"/> Item 14. Special Handling Instructions and Additional Information <input type="checkbox"/> Item 15. Generator's / Offeror's Certifications <input type="checkbox"/> Item 16. International Shipments (Import or Export must be noted) <input type="checkbox"/> Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt) <input type="checkbox"/> Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility) <input type="checkbox"/> Item 19. Hazardous Waste Report Management Codes (On returned copies only) <input type="checkbox"/> 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) <input type="checkbox"/> The next non-rail transporter? <input type="checkbox"/> The Designated Facility if transported solely by rail? <input type="checkbox"/> 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 40 CFR 262.23(f)? 262.23(f)	✓		
Item No.	40 CFR 262 Subpart C -- 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) <input type="checkbox"/> Generator's Name and Address? <input type="checkbox"/> Generator's EPA ID Number? <input type="checkbox"/> Manifest Tracking Number?	✓		

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Item No.	40 CFR 262 Subpart C -- 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	✓		
Item No.	40 CFR 262 Subpart C -- 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: <input type="checkbox"/> Containers - Complete Container Checklist below <input type="checkbox"/> Tanks - Complete 40 CFR 265 Subpart J Tanks Checklist and meet 265 Subparts AA, BB, and CC, as applicable <input type="checkbox"/> Drip Pads - Complete 40 CFR 265 Subpart W Checklist <input type="checkbox"/> Containment Buildings - Complete 40 CFR 265 Subpart DD Checklist			
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.34(b)	✓		
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 265.111? 265.111	✓		
4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 265.114? 265.114	✓		
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.34(a)(2)	✓		
4.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.34(a)(2)	✓		
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.34(a)(3)	✓		
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? 262.34(c)(1)	✓		
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.34(c)(1)	✓		
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.34(c)(1)(i), 265.171	✓		
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.34(c)(1)(i), 265.172	✓		
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.34(c)(1)(i), 265.173(a)	✓		
4.54	Has the generator marked satellite containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers? 262.34(c)(1)(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.)			
4.56	If YES, within 3 days did the generator mark an accumulation start date on the excess waste container? 262.34(a)(2)	✓		
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.34(a)(3)	✓		
Item No.	40 CFR 265 Subpart I -- 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.) 265.171	✓		
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? 265.172	✓		
4.60	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 265.173(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? 265.173(b)	✓		
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 265.174	✓		
4.63	Does the generator properly document the weekly inspections? 62-730.160(5)	✓		
4.64	This should include at a minimum: (Check items below that are not in compliance) <input type="checkbox"/> Date and Time of inspection <input type="checkbox"/> Legibly printed name of inspector <input type="checkbox"/> Number of hazardous waste containers <input type="checkbox"/> Condition of containers <input type="checkbox"/> Notation of observations made <input type="checkbox"/> Date and nature of any repairs or remedial actions			

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Item No.	40 CFR 265 Subpart I -- 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? 265.176	✓		
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)? 265.177(a), 265.17(b)	✓		
4.67	If the facility places hazardous waste in an unwashed container that previously held incompatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 265.177(b), 265.17(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)? 265.177(c)	✓		
Item No.	40 CFR 265.16 -- 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? 265.16(a)(1)	✓		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 265.16(a)(2)	✓		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 265.16(a)(2)	✓		
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? 265.16(a)(3)	✓		
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? 265.16(b)	✓		
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 265.16(b)	✓		
4.75	Does the generator review training annually, at least once each calendar year? 265.16(c)	✓		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 265.16(d)(1)	✓		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 265.16(d)(2)	✓		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 265.16(d)(3)	✓		
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 265.16(d)(4)	✓		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 265.16(e)	✓		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 265.16(e)	✓		
Item No.	40 CFR 265 Subpart C -- 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? 265.31	✓		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 265.32(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? 265.32(b)	✓		
4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 265.32(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? 265.32(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 265.33	✓		
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? 265.34(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? 265.34(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? 265.35	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 265.37(a)(1)	✓		
4.92	Where more than one police or fire department may respond, has the facility designated a primary emergency police and/or fire authority? 265.37(a)(2)	✓		
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 265.37(a)(3)	✓		
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? 265.37(a)(4)	✓		
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 265.37(b)	✓		

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Item No.	40 CFR 265 Subpart D -- Contingency Plan and Emergency Procedures	Yes	No	N/A
4.96	Does the facility have a contingency plan? 265.51(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? 265.51(b)	✓		
4.98	Does the contingency plan describe actions to be taken in response to the following:			
4.99	Fires? 265.52(a)	✓		
4.100	Explosions? 265.52(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? 265.52(a)	✓		
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 265.52(b)	✓		
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 265.52(c)	✓		
4.104	Does the plan list names, addresses (office & home), and phone numbers (office & home) of emergency coordinator(s)? 265.52(d)	✓		
4.105	Does the plan identify the primary emergency coordinator and list alternates in order the they will assume responsibility? 265.52(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? 265.52(e)	✓		
4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 265.52(f)	✓		
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 265.53(a)	✓		
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 265.53(b)	✓		
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? 265.54	✓		
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? 265.55	✓		
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 265.56? 265.56	✓		
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? 265.56(i)	✓		
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? 262.40(c)	✓		
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 intended to be shipped off-site? 262.53(a)	✓		
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 262.60? 262.60	✓		

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**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.

Kayla Acosta

**Principal Inspector Name**

Inspector

**Principal Inspector Title****Principal Inspector Signature**

DEP

**Organization**

07/25/2018

**Date**

Tony Cevallos

**Representative Name**

Environmental Specialist

**Representative Title**

Florida Power &amp; Light Company

**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:**

Norva Blandin

**Inspection Approval Date:**

07/25/2018