FLORIDA POWER & LIGHT (FLD000807792)
PORT WEST PROPERTIES
2455 PORT WEST BOULEVARD
WEST PALM BEACH, FLORIDA 33407-1248

Facility Contacts:

Primary Emergency Coordinator:	**Porfirio A Cevallos (Tony)**	**Office 561-845-4973** **Home 561-309-8095** **Cell 561-662-7536**	**24/7**
Secondary Emergency Coordinator:	**Jeff Wade**	**Office 561-681-3135** **Emergency Line 561-640-2515** **Cell 954-599-0317**	**24/7** **24/7**

Hazardous Waste Information

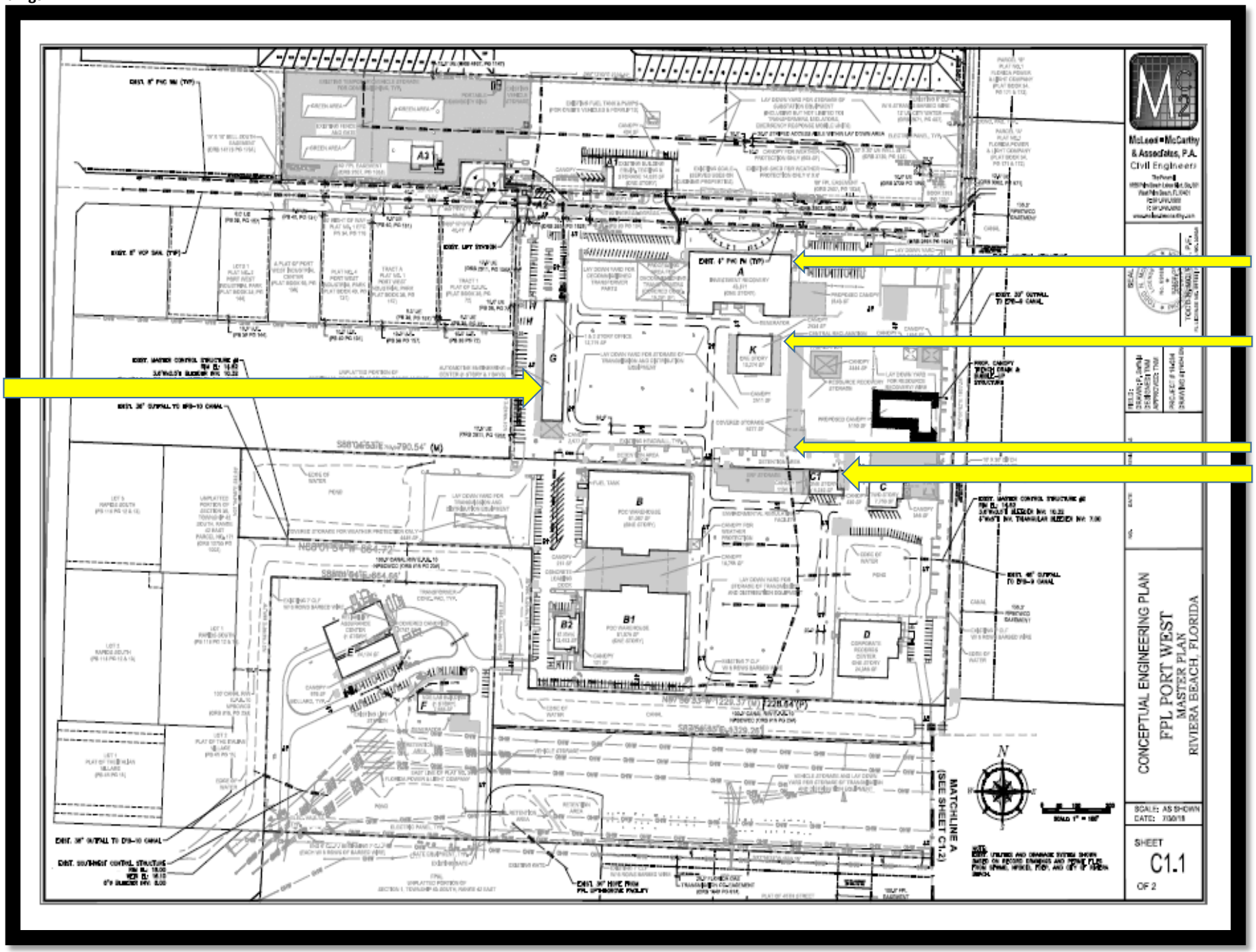
Name of Waste	Waste Code	Waste Type	Location Accumulation	Maximum Amounts Present	Response Notes	Special notes to Hospital/Treatment personnel
1. Bead Blast	D006 D008 (Cadmium and Lead)	RCRA	Outside of building **"K"**, on Southeast corner and/or Inside building **"C-1"** by Central Accumulation Area **CAA**	one, 55-gallons drum	Proper cleanup and disposal of excess materials is crucial to preserving the safety of the local water supply, and to avoid spreading pollutants through the space and neighboring properties	If personnel comes into direct contact with material, have an employee wash their body parts, if in eyes wash eyes for several minutes.
2. Aerosol Cans	D001 (Ignitability)	RCRA	Inside building **"C-1"** by Central Accumulation Area **CAA** and Satellite Accumulation area **SAA**	Twenty five -55 gallon drums	Use PPE to prevent contact with skin and eyes	If personnel comes into direct contact with material, have an employee wash their body parts, if in eyes wash eyes for several minutes.
			Inside Building **"k"** by paint booth on the south east side of the building	one, 55-gallons drum		
			In bay # 3 and bay # 5 inside building **"G"**-East Fleet Garage	Two, 55 gallon drums		
3. Unused expired product	Various Waste Codes/TCLP	RCRA	Inside building **"C-1"** by Central Accumulation Area **CAA** and satellite Accumulation area **SAA**	Three standard pallets	Used absorbent material inside conex behind building " C-1"	None
4. Waste Paint Related Material	D001 (Ignitability)	RCRA	Inside building **"C-1"** by Central Accumulation Area **CAA** and Satellite Accumulation area **SAA**	one, 55-gallons drum	Use PPE to prevent contact with skin and eyes	None
5.Parts Washer Filter Media/Solution	Various Waste Codes/TCLP	RCRA	In bay # 2 inside building **"G"**-East Fleet Garage and/or Inside building **"C-1"** by Central Accumulation Area **CAA**	one, 30 gallon drum	Use PPE to prevent contact with skin and eyes	If personnel comes into direct contact with material, have an employee wash their body parts, if in eyes wash eyes for several minutes.
6. Used Mineral Oil > 50 < 500 ppm PCB's	PCB	TSCA	Building **"A"** Inside south side-Annex III Storage 6000 gallons tank-Temporary Storage On-site	one, 6,000 gallon tank inside a berm-Annex III Storage	Use PPE to prevent contact with skin and eyes	If personnel comes into direct contact with material, have an employee wash their body parts, if in eyes wash eyes for several minutes.
7.. PCB Small Capacitors from Street Light Heads decommissioning	PCB	TSCA	Inside building **"C-1"** by Central Accumulation Area **CAA**	one, 55-gallons drum	Use PPE to prevent contact with skin and eyes	If personnel comes into direct contact with material, have an employee wash their body parts, if in eyes wash eyes for several minutes.
8. Power Generation Central Lab- TSCA Lab Samples	PCB	TSCA	Inside building **"C-1"** Inside - Annex III Storage by Central Accumulation Area **CAA**	one, 55-gallons drum	Use PPE to prevent contact with skin and eyes	If personnel comes into direct contact with material, have an employee wash their body parts, if in eyes wash eyes for several minutes.

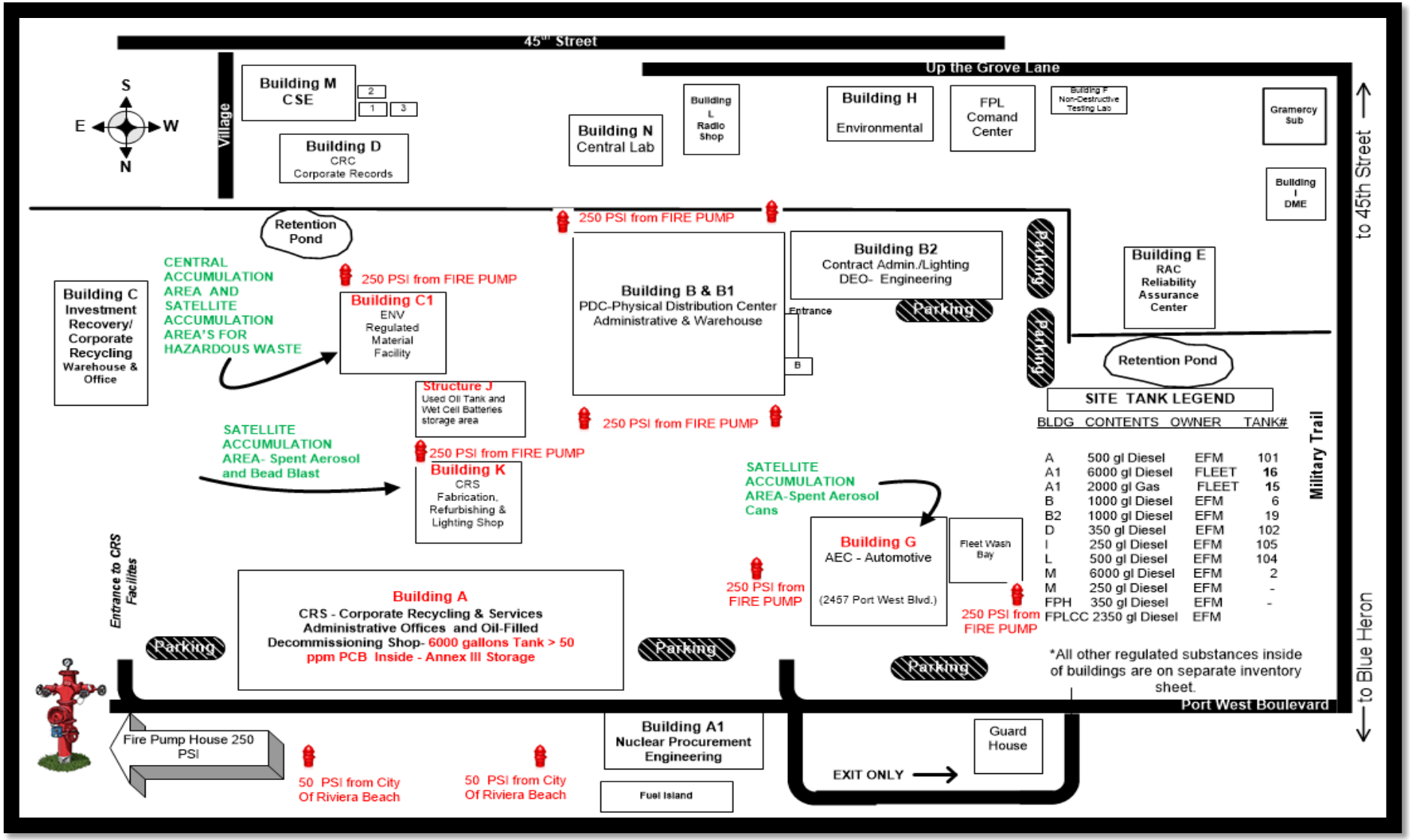
9. Field spills clean up debris -PCB>50 ppm Soil/ Debris	PCB	TSCA	Inside building "C-1" Inside - Annex III Storage by Central Accumulation Area CAA	Six, 55-gallons drum	Use PPE to prevent contact with skin and eyes	If personnel comes into direct contact with material, have an employee wash their body parts, if in eyes wash eyes for several minutes.
10. HID-Lamps/Mercury Vapor Bulbs and lamps	D009 (Low risk-Managed as Universal Waste)	Universal Waste	Inside building "C-1" Inside Accumulation Area - and outside building "K" on the south west side of the building	Twenty pallets inside building "C-1" and Two 55 gallon drums outside building "K".	The Clean-up: 1. All workers shall be trained in accordance with the OSHA Hazard Communication Standard. 2. Use proper hand and eye protective equipment. 3. Carefully sweep and place broken glass into empty drum, plastic bag, or box. 4. Properly seal the drum, box, or bag with tape or other means.	None
10. Mercury Containing Devices	D009 (Low risk-Managed as Universal Waste)	Universal Waste	Inside building "C-1" inside Accumulation Area	One,30 gallons poly drum	The Clean-up: 1. All workers shall be trained in accordance with the OSHA Hazard Communication Standard. 2. Use proper hand and eye protective equipment. 3. Carefully sweep and place broken glass into empty drum, plastic bag, or box. 4. Properly seal the drum, box, or bag with tape or other means.	None
11. Lithium Batteries	D009 (Low risk-Managed as Universal Waste)	Universal Waste	Inside building "C-1" inside Accumulation Area	One,30 gallons poly drum	The Clean-up: 1. All workers shall be trained in accordance with the OSHA Hazard Communication Standard. 2. Use proper hand and eye protective equipment. 3. Carefully tape all terminals to prevent metal to metal contact. 4. Properly seal the drum, box, or bag with tape or other means.	None
12. NI-Cad Batteries	(Low risk-Managed as Universal Waste)	Universal Waste	Inside building "C-1" inside Accumulation Area	One,30 gallons poly drum	The Clean-up: 1. All workers shall be trained in accordance with the OSHA Hazard Communication Standard. 2. Use proper hand and eye protective equipment. 3. Carefully tape all terminals to prevent metal to metal contact. 4. Properly seal the drum, box, or bag with tape or other means.	None
13. Lead Acid Batteries	D002 (Low risk-Managed under Subpart G)	Wet Cell Batteries-Managed under Subpart G	Inside building "J" Just northwest of building "C-1".	Thirty three thousands pounds packed in around 28 wooden pallets	Wear protective equipment, access spill response material from conex behind building "C-1", Eliminate all ignition sources, do not touch damaged containers, Stop leak if you can do it without risk, absorb or cover with dry earth, and or other non-combustible material. Prevent form entry into waterways, Clark valve in place sewers. DO NOT GET WATER INSIDE CONTAINERS	Administer Oxygen if breathing is difficult, remove and isolate contaminated clothing and shoes, in case of contact with substance, immediately flush skin or eyes with running water for at least 20 minutes, for minor skin contact, avoid spreading material on unaffected skin. EFFECTS of exposure to substance may be delayed.

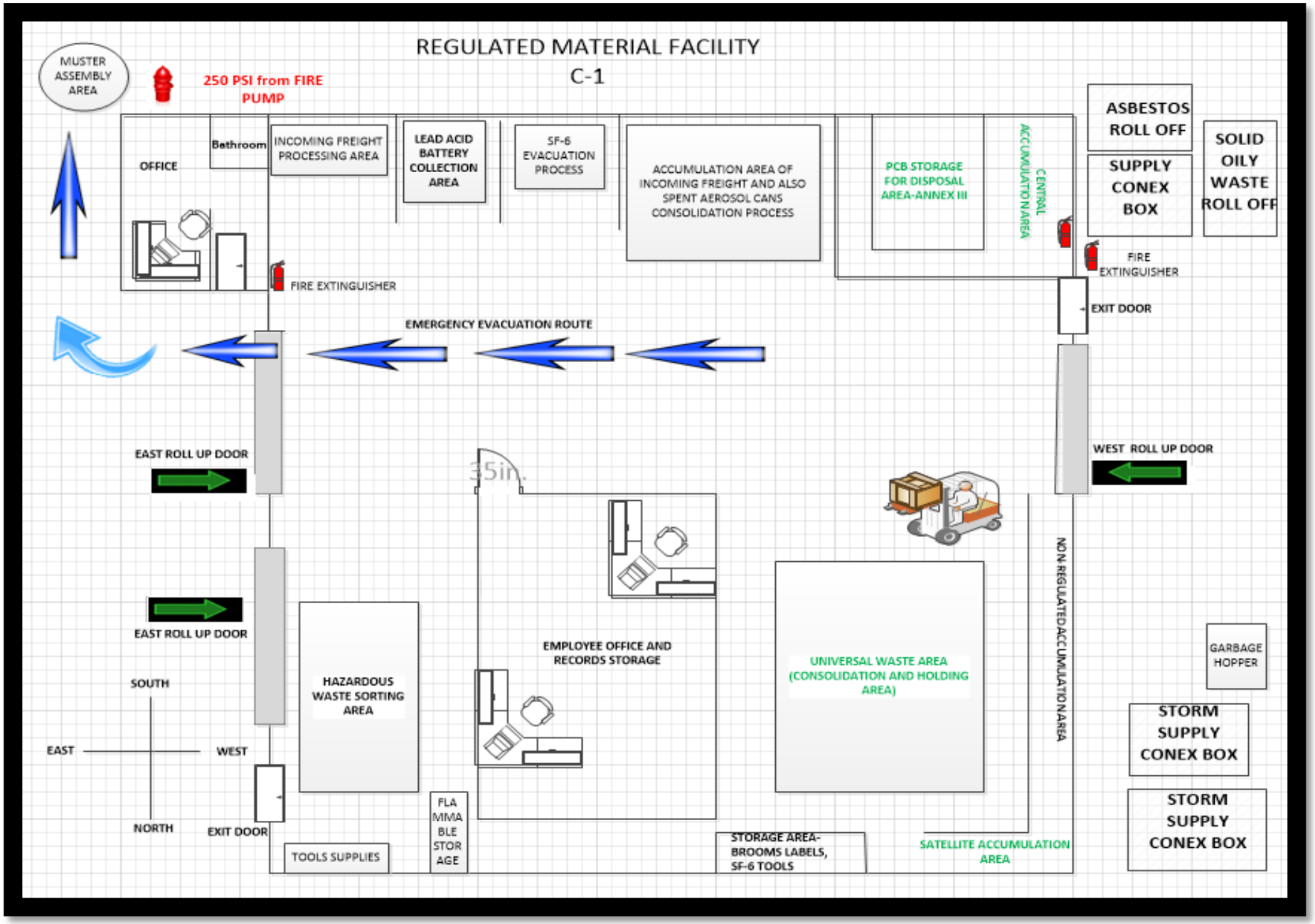
FLORIDA POWER LIGHT
2455 PORT WEST BLVD
WEST PALM BEACH, FL 33407

Buildings

Buildings



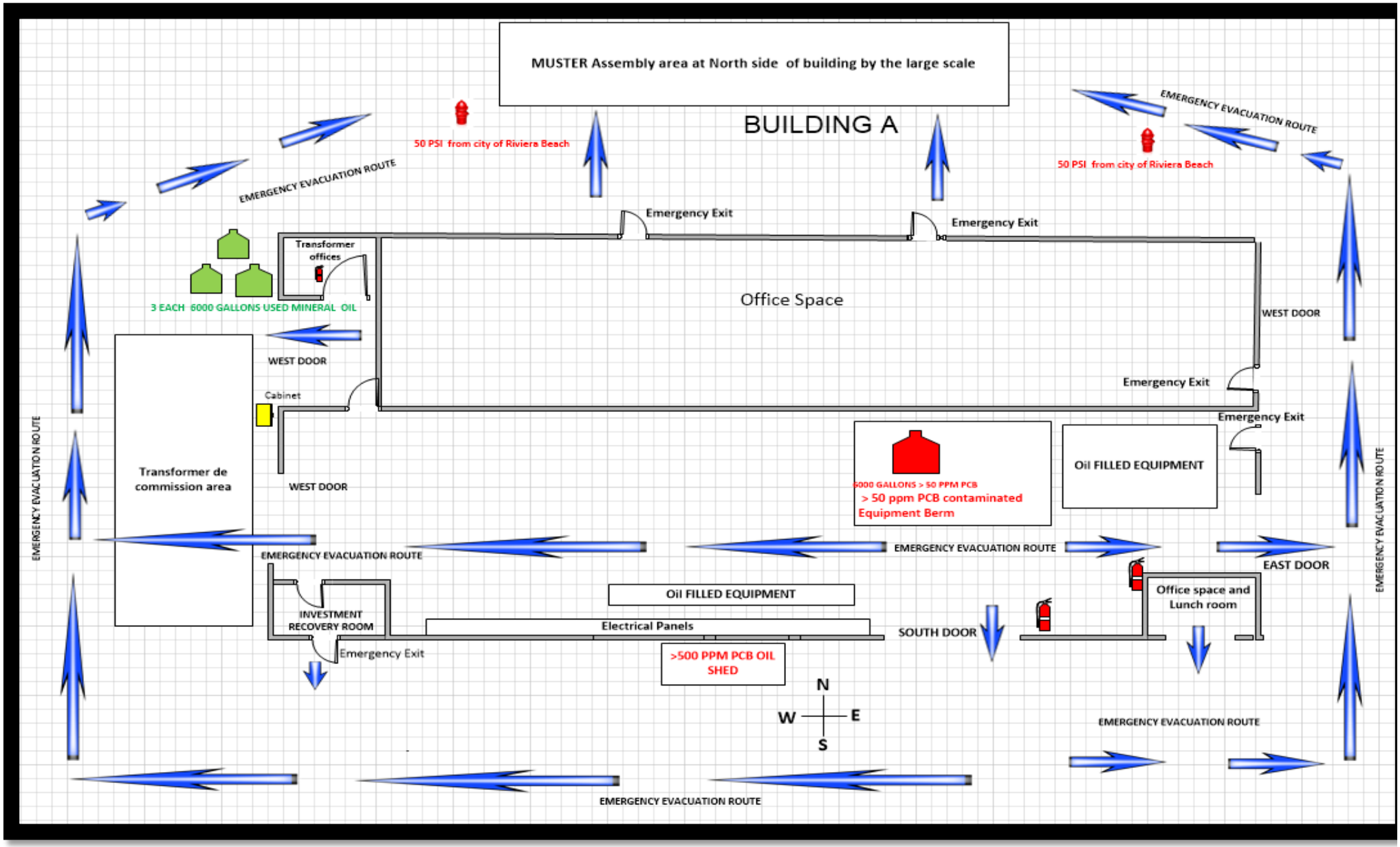

45th Street
Up the Grove Lane
S
E
W
N
Village
Building M
CSE
2
1
3
Building D
CRC
Corporate Records
Building N
Central Lab
Building L
Radio Shop
Building H
Environmental
FPL
Comand
Center
Building F
Non-Destructive
Testing Lab
Gramercy
Sub
Building I
DME
to 45th Street
Retention
Pond
250 PSI from FIRE PUMP
Building B & B1
PDC-Physical Distribution Center
Administrative & Warehouse
Building B2
Contract Admin./Lighting
DEO- Engineering
Parking
Entrance
B
Building E
RAC
Reliability
Assurance
Center
Retention Pond
CENTRAL
ACCUMULATION
AREA AND
SATELLITE
ACCUMULATION
AREA'S FOR
HAZARDOUS WASTE
Building C
Investment
Recovery/
Corporate
Recycling
Warehouse &
Office
250 PSI from FIRE PUMP
Building C1
ENV
Regulated
Material
Facility
Structure J
Used Oil Tank and
Wet Cell Batteries
storage area
250 PSI from FIRE PUMP
SATELLITE
ACCUMULATION
AREA- Spent Aerosol
and Bead Blast
250 PSI from FIRE PUMP
Building K
CRS
Fabrication,
Refurbishing &
Lighting Shop
SITE TANK LEGEND
BLDG CONTENTS OWNER TANK#
A 500 gl Diesel EFM 101
A1 6000 gl Diesel FLEET 16
A1 2000 gl Gas FLEET 15
B 1000 gl Diesel EFM 6
B2 1000 gl Diesel EFM 19
D 350 gl Diesel EFM 102
I 250 gl Diesel EFM 105
L 500 gl Diesel EFM 104
M 6000 gl Diesel EFM 2
M 250 gl Diesel EFM -
FPH 350 gl Diesel EFM -
FPLCC 2350 gl Diesel EFM
Military Trail
SATELLITE
ACCUMULATION
AREA-Spent Aerosol
Cans
Building G
AEC - Automotive
(2457 Port West Blvd.)
Fleet Wash
Bay
250 PSI from
FIRE PUMP
250 PSI from
FIRE PUMP
Entrance to CRS
Facilities
Parking
Building A
CRS - Corporate Recycling & Services
Administrative Offices and Oil-Filled
Decommissioning Shop- 6000 gallons Tank > 50
ppm PCB Inside - Annex III Storage
Parking
Parking
*All other regulated substances inside
of buildings are on separate inventory
sheet.
Port West Boulevard
to Blue Heron
Fire Pump House 250
PSI
50 PSI from City
Of Riviera Beach
50 PSI from City
Of Riviera Beach
Building A1
Nuclear Procurement
Engineering
Fuel Island
Guard
House
EXIT ONLY

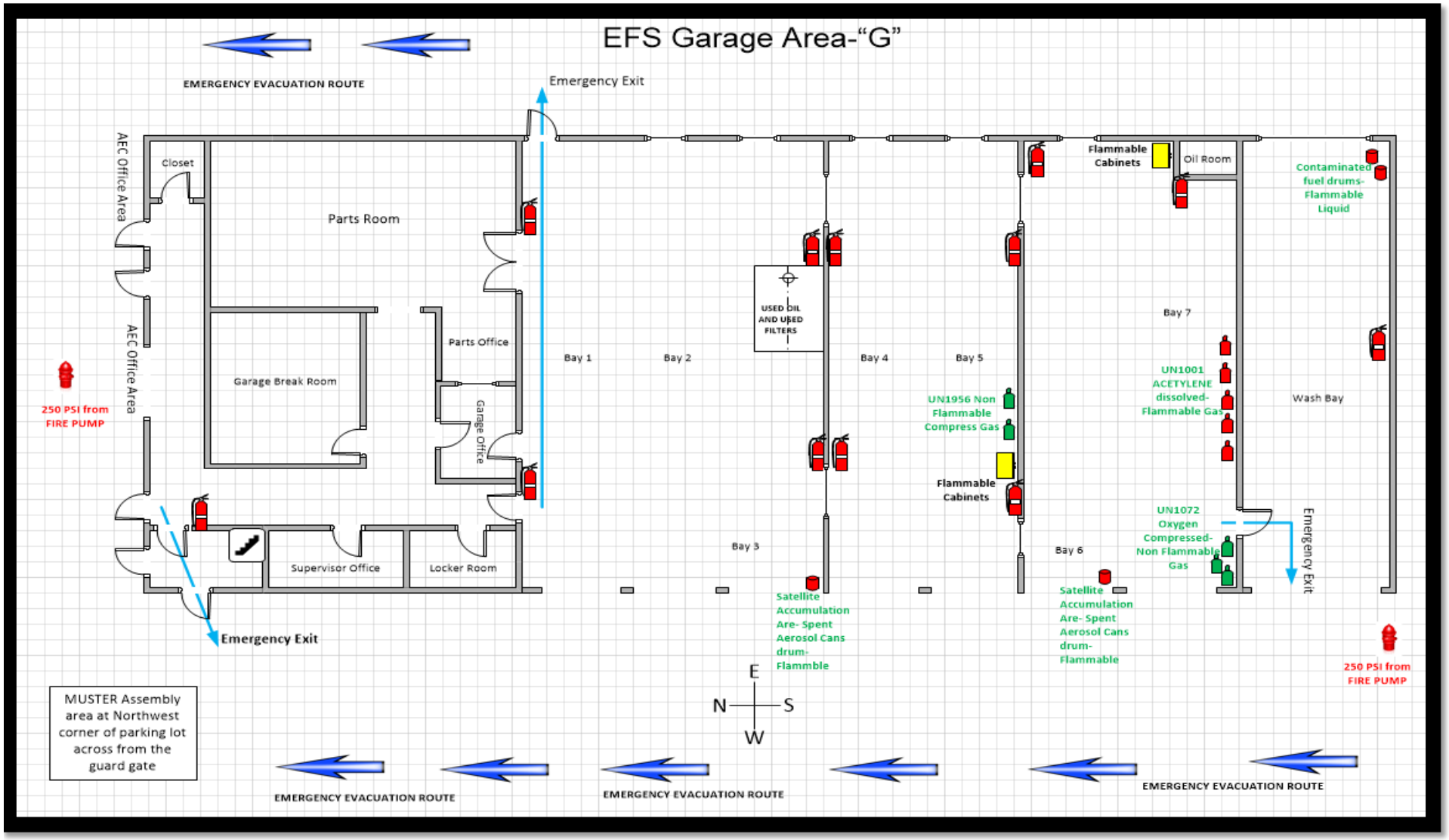


Central accumulation area for Aerosol cans, Bead Blast and Paint related material(D001,D006,D008)

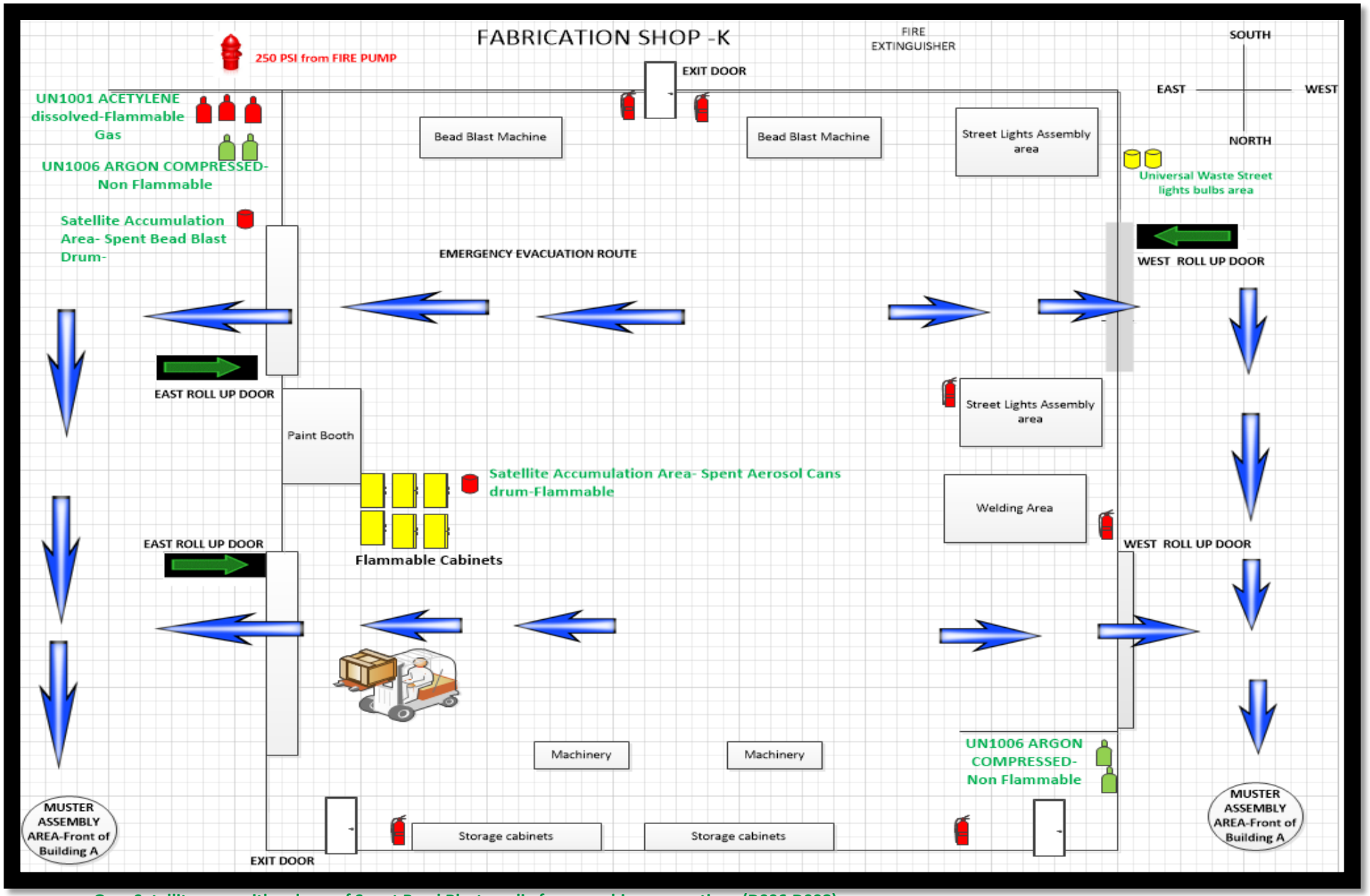
Satellite accumulation area for Aerosol cans and Paint Related Material(D001)

Fire alarm notifies "Simplex" who monitors all on site alarm panels

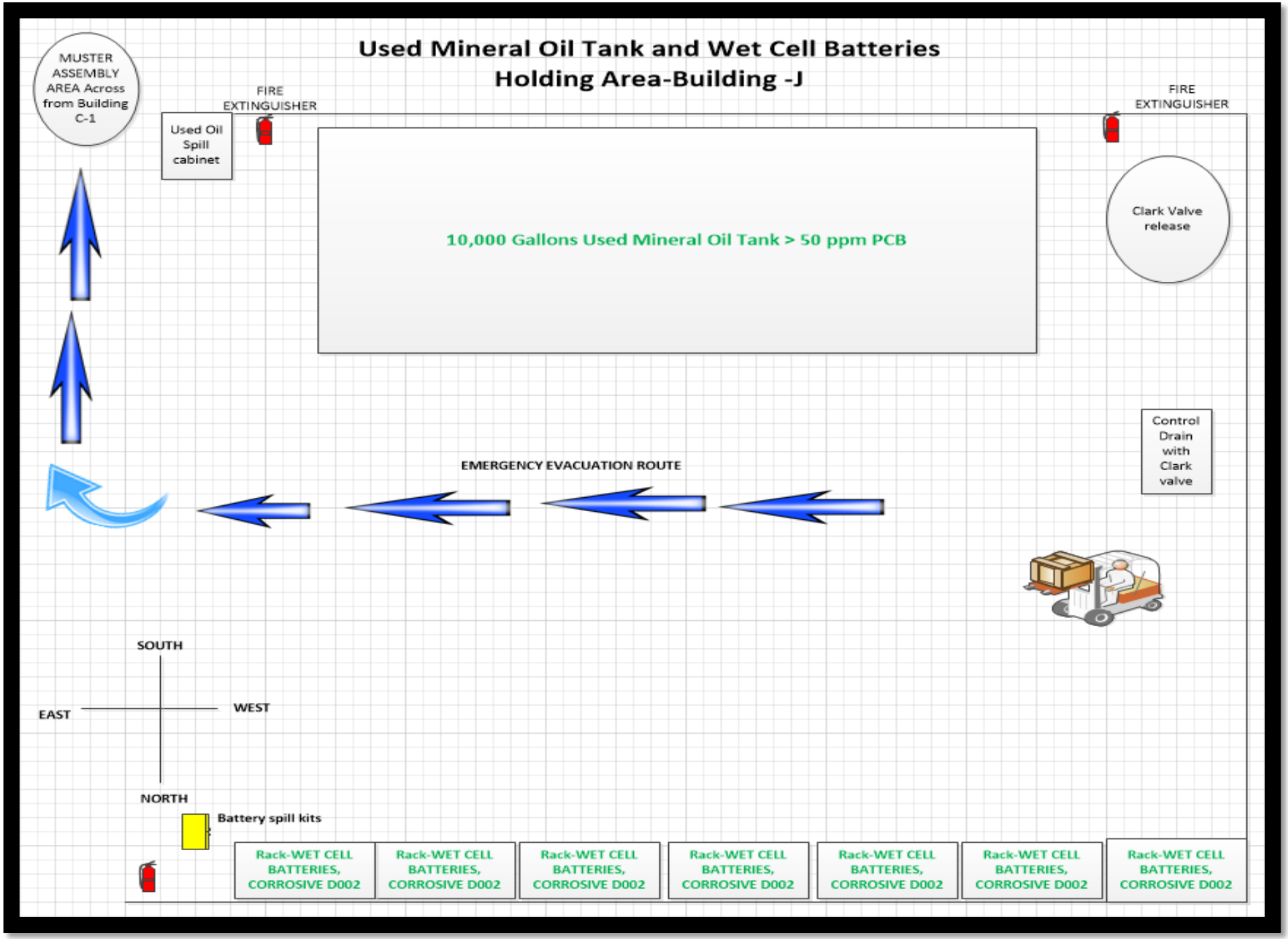

MUSTER Assembly area at North side of building by the large scale
BUILDING A
50 PSI from city of Riviera Beach
50 PSI from city of Riviera Beach
EMERGENCY EVACUATION ROUTE
EMERGENCY EVACUATION ROUTE
Emergency Exit
Emergency Exit
Transformer offices
3 EACH 6000 GALLONS USED MINERAL OIL
Office Space
WEST DOOR
WEST DOOR
Cabinet
Emergency Exit
Emergency Exit
Transformer de commission area
WEST DOOR
6000 GALLONS > 50 PPM PCB
> 50 ppm PCB contaminated Equipment Berm
Oil FILLED EQUIPMENT
EMERGENCY EVACUATION ROUTE
EMERGENCY EVACUATION ROUTE
EAST DOOR
EMERGENCY EVACUATION ROUTE
EMERGENCY EVACUATION ROUTE
Oil FILLED EQUIPMENT
Office space and Lunch room
INVESTMENT RECOVERY ROOM
Electrical Panels
SOUTH DOOR
Emergency Exit
>500 PPM PCB OIL SHED
N
W
E
S
EMERGENCY EVACUATION ROUTE
EMERGENCY EVACUATION ROUTE
EMERGENCY EVACUATION ROUTE



Two, Aerosol cans Satellite Areas (D001)
Three, Compressed Gas cylinders areas (Class 2)
Two, Used and new oil containers areas(Non-Haz.)
Four, Off specifications contaminated fuel drums



One, Satellite area with a drum of Spent Bead Blast media from machines operations (D006,D008)
One, satellite area with a drum of Spent Aerosol Cans (D001)
One, satellite are for Universal Waste (Lamps)
Two, areas containing various compress gas



One, 10,000 gallons tank of Used Mineral Oil

One, holding area of Batteries wet filled with acid for recycling (Corrosive D002)

HAZARDOUS WASTE MANAGEMENT PROGRAM

And

HAZARDOUS WASTE CONTINGENCY PLAN

FLORIDA POWER & LIGHT
FLD000807792
PORT WEST PROPERTIES
2455 PORT WEST BOULEVARD
WEST PALM BEACH, FLORIDA 33407-1248

File: HWMP
Revision: March 14th, 2019

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I. INTRODUCTION – GENERAL REGULATORY FRAMEWORK

Small amounts of hazardous waste are generated at the Port West Properties Site Complex. Thus, to ensure that all hazardous wastes generated at these facilities are managed in full compliance with applicable federal and state regulations, this Hazardous Waste Management Plan has been developed to provide guidance for all relevant aspects of hazardous waste regulatory conformance.

This plan describes the site's hazardous waste management obligations as required by the Federal Resource Conservation and Recovery Act (RCRA) and implementing regulations (40 CFR 260 through 266), as adopted by reference into Chapter 17-730 Florida Administrative Code (FAC). Every January, the plan will be reviewed by the Site Program Coordinator, and if deemed appropriate, will be amended or revised to reflect current site conditions and activities. Major changes in waste volumes, types or programs will be instrumental in determining the need to amend the existing plan.

Also described are the management methods that take place to handle those specific waste materials that are managed at the Port West Properties Environmental Regulated Materials Facility under Waste Consolidation from VSQG's at a LQG (40 CFR 262.14 (a)(5)(viii) regulatory requirement. This program is described in detail later in this document.

The Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP) have assigned a RCRA Identification Number for the Port West Properties Site. The assigned number and mailing address of the site for RCRA purposes is:

RCRA Identification Number: FLD000807792

RCRA Address: **PORT WEST PROPERTIES**
2455 PORT WEST BLVD., BUILDING A
WEST PALM BEACH, FLORIDA 33407

For purposes of the RCRA program, approximately **one third of the Port West Properties Site located North of Canal EB-10 and West of Canal EB-9 (Identified in Figure 4 on page 13)** is presently classified as a **"Large Quantity Generator" (LQG),** generating more than 1,000 kilograms (2,200 pounds) of hazardous waste per month.

Appendices A, G-1 and G-2, H and I are some of the hazardous waste management regulations, a summary of interpretations of the regulation developed by FDEP and **Contingency Plan Guidance developed by the FDEP. (Contingency Planning – Preparedness and Prevention information and procedures are included under Section VII of the plan, and those specific areas are highlighted in the Table of Contents for ease in locating during an emergency.)**

II. FACILITY DESCRIPTION

A. Physical Facility Description and Operations

Port West Properties Site Complex is utilized for a variety of general FPL operating business functions, carried out by several different departments. The complex is comprised of seventeen (17) buildings situated on approximately 200 acres in both the cities of Riviera Beach and West Palm Beach, Florida. There are approximately 300 FPL personnel presently working at this site. Figures 1 and 2 are maps showing the geographical location of the site, including the major roads serving the area. Figure 3 is a schematic of the site including buildings, parking lots and other prominent features. The whole site is served by the West Palm Beach Sewer System.

FIGURE 1
GEOGRAPHICALLY SHOWN SITE LOCATION
WITHIN THE STATE OF FLORIDA

FIGURE 2
GEOGRAPHICALLY SHOW SITE LOCATION
WITHIN PALM BEACH COUNTY

From I-95:

1. Take 45th Street going West /FL-702W, Exit #54.
2. Turn RIGHT at Military Trail.
3. Turn RIGHT onto Port West Blvd (By Water Rapids).
4. Travel on Port West Blvd to end of Road

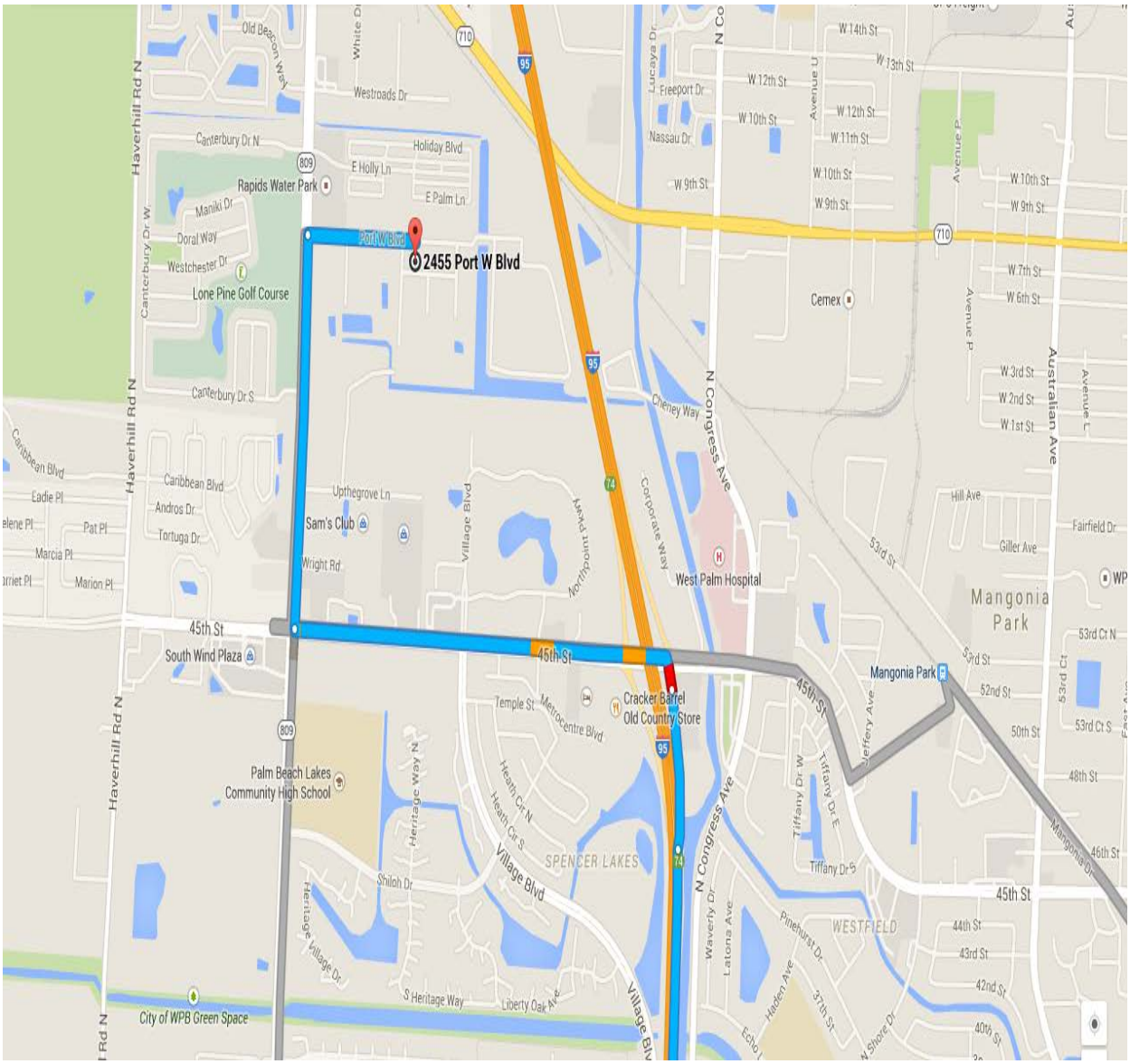
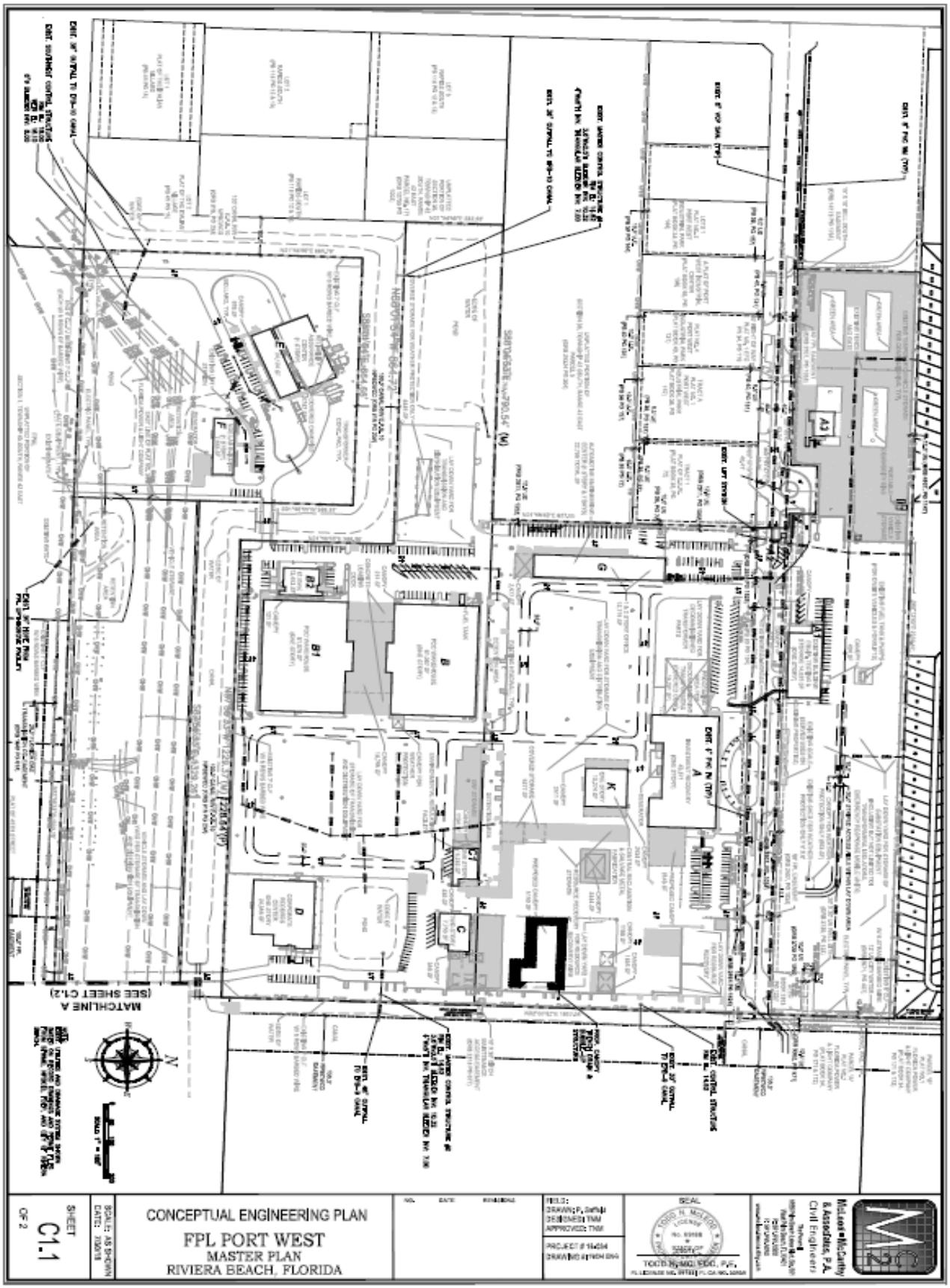


FIGURE 3
SCHEMATIC DIAGRAM OF THE
PORT WEST PROPERTIES SITE



B. **Systems and Operation Where Hazardous Waste may be Generated**

The Port West Properties Site complex has several operations and/or systems where hazardous wastes are routinely generated. The majority of these wastes, however, are infrequently generated in relatively small quantities. Most business units on the complex are responsible for managing their own specific waste streams under the purview of the Program Coordinator. General maintenance waste such as fluorescent bulbs, lead acid batteries, ni-cad batteries, aerosol cans, and paint related materials generated by the business units on site, are collected within the unit then transported, still within the confines of the site, to the Regulated Materials Facility for subsequent waste management. The major operating units on the Port West Properties site, and their specific hazardous waste streams are:

1. Corporate Recycling Services

- Bead blast machines are used to clean electrical connectors.
- Aerosol cans.
- Paint related material.

2. Transformer Decommissioning

All oil filled electrical equipment and transformers are drained of "free flowing oil", < 499 PPM PCB's, under Federal and State TSCA-PCB Rules.

All oil filled equipment and transformers > 500 PPM PCB's. Are not drained and managed intact, shipped to an approved vendor who will decommission and incinerate as prescribed under Federal, State, and TCSA-PCB Rules.

All mineral oil <49 PPM PCB's is sent to approved used oil recycler. All > 50 PPM PCB oil is sent to an approved TSCA facility which will incinerate as prescribed by TSCA-PCB rules.

3. Street Light Sort / Evaluate / Dismantle

CRS personnel first remove, and then segregate, oil filled capacitors and ballasts from the street light heads that are collected from all company service centers. Collected and segregated drums of suspect PCB ballasts and oil filled capacitors are transfer to the Regulated Material Facility and disposed of as a TSCA waste. These ballasts are not hazardous wastes and are therefore not required to be counted in the monthly hazardous waste generation accounting. All HID lamps are transferred to the Regulated Materials Facility for consolidation and shipment to an off site recycler, in accordance with FAC 62-737.

4. Environmental Services

The Environmental Services Manager at the RMF manages the Power Delivery Business Unit's "Very Small Quantity Generator (VSQG) Program". Under the authorization of the FDEP 40 CFR, quantities from VSQG waste are collected from all FPL Power Delivery Service Centers, FPL Power Plants, FPL office buildings and some NextEra Energy, Inc. sites in Florida. These wastes normally consist of empty aerosol spray cans, paint related wastes and occasionally, off specification chemicals. More information on these programs will be discussed in Chapters III and IV.

The majority of waste management activities for CRS and the FPL Power Delivery Business and NextEra Energy Sites takes place in the Regulated Materials Facility. The Regulated Material Building was designed to provide a facility that meets or exceeds regulatory requirements for various waste management activities. It is a 60' x 80' building, constructed on a concrete floor underlaid with a 30 mil high-density polyethylene liner with sealed seams. The concrete floor has a polyurethane sealer coating. The building has a separate hood ventilated sampling area, a Central Accumulation Area for hazardous waste for disposal area, a staging area for non-regulated material and an additional, separated area for aerosol cans processing within the satellite collection. The facility added a PCB Storage for Disposal area with containment in 2002. This storage area is designed to hold 140 cubic feet (1047 gallons).

Environmental personnel, at the Regulated Material Building, manage the fluorescent tube and HID lamp collection and recycling programs for most of the FPL and NextEra Energy facilities system-wide. They also manage the collection and recycling programs for lead acid batteries, Lithium and ni-cad batteries and monitor electronic circuit boards. Dismantling these items are managed under recycling regulations, are not generally subject to RCRA regulation, and do not have to be counted in the monthly RCRA hazardous waste generation accounting. More information on these programs will be discussed in Chapter V.

5. Automotive Engineering Center –East Fleet Services (EFS)

The activities of this department include design of specifications, acquisition, receipt check-in and outfitting of new automotive and construction equipment. Another section of the department at the same facility manages the receipt, cannibalization or repair and sale of retired vehicles.

The EFS also generates oily rags, used oil and oil filters. These materials are recycled using outside firms and do not have to be included in hazardous waste accounting. They also generate aerosol cans on site which are accumulated by them (SAA) and sent to the Regulated Materials Facility for disposal.

The EFS also could generated ZEP parts washer RCRA/ or Non RCRA Waste.

6. Corporate Records Center

This facility generates general maintenance wastes and may, on rare occasions, dispose used microfiche from records retention, for recycling and silver recovery. This used microfiche is not required to be entered into the monthly RCRA hazardous waste generation accounting, due to the low soluble silver level. All microfiche is shredded by current approved vendor on a yearly schedule.

7. Warehousing and Office Complex

This facility generates general maintenance wastes and could also generated unused expired products for disposal.

8. Other Buildings and Departments on Site.

There are other buildings and departments located at the Port West Properties Site and are not part of the Large Quantity Generator (LQG) status. These other buildings fall under a different EPA ID than the Port West Properties(FLD000807792)

CRS WASTE MINIMIZATION POLICY (9-18-2014)

WASTE MINIMIZATION POLICY

The Waste Minimization Plan for Florida Power and Light's (FPL) Corporate Recycling & Services (CRS) operation and the Regulated Materials Facility (RMF) is designed to support FPL's commitment to conserving resources as stated in the Nextera Energy Corporate Environmental Policy (Appendix A). This policy establishes that as a corporation:

"[We] are committed to being an industry leader in environmental protection and stewardship, not only because it makes business sense, but because it is the right thing to do. Our commitment to compliance, conservation, communication, and continuous improvement fosters a culture of environmental excellence and drives the sustainable management of our business planning, operations, and daily work.

In accordance with our commitments to environmental protection and stewardship, NextEra Energy, Inc. endeavors to: (…)

Conserve

- *Prevent pollution, minimize waste, and conserve natural resources*
- *Avoid, minimize, and/or mitigate impacts to habitat and wildlife*
- *Promote the efficient use of energy, both within our company and in our communities*."

The operations at the CRS support this policy through a focused effort to minimize waste by consolidation to facilitate the identification of opportunities for material and equipment reuse and viable markets for recycling. When a viable market for recycling or reuse cannot be identified, then the non-regulated waste is streamed to the landfill; all regulated waste is consolidated at the RMF to insure proper management and disposal in accordance with Federal, State and local guidelines.

HISTORY AND GOALS

In 1991, FPL spent $1.2 million hauling trash from its service centers alone. In that same year, the state of Florida mandated that county trash disposal volumes be reduced by 30% by the end of the following year. FPL responded by reviewing and identifying opportunities to reduce the quantity of solid waste disposal. The Legislature has since set a new goal to recycle 75% of the municipal solid waste stream by 2020.

FPL has already accomplished much in support of the State's goal through the company's waste minimization program, which is solely responsible for the collection and disposal of scrap materials at its service centers. One of the program's highest priorities is to educate employees on the importance of recycling.

Waste minimization is the reduction in volume and toxicity of the waste which is produced in our daily activities. This reduction can be achieved in many ways. Waste can be reduced by using less packing material. Used material can be recycled into another useful product, as used conductor is broken down into its raw metals. Waste can also be reduced by prolonging the life of used material through refurbishment. Waste minimization also offers economic benefits essential for cost competiveness through avoided and reduced operating costs. By removing cardboard from the waste stream, disposal volumes have significantly dropped since plan inception.

FPL has made a commitment to not only reduce disposal cost and volume, but also demonstrate a proactive attitude toward environmental issues.

CRS is responsible for supporting FPL efforts on waste minimization. Together with salvaging and scrapping material, an emphasis has been placed on recovery (redeployment or finding new markets) for used items, and promoting the recycling program. This plan is designed to provide guidance regarding what material is recyclable and how to effectively construct and manage a salvage area.

CORPORATE RECYCLING & SERVICES OPERATIONS

The Corporate Recycling and Services operation (CRS) is located at the Physical Distribution Center (PDC) in Riviera Beach, FL. Since its inception in 1980, CRS has operated on a positive cash flow basis.

CRS operations can process nearly all end-of-use material, which is initially collected and sorted at the service centers. At CRS, this material is typically:

- Refurbished
- Sold as scrap
- Recycled
- Disposed (includes environmentally sensitive waste items)

CRS PRODUCTION AREAS

Wire and Cable

Scrap wire and cable is processed as follows:

• URD, or underground cable contains inhibitor, a gooey substance used as an oxidation inhibitor, and therefore the cable is removed from its jacket and cut into 4’ pieces

• Overhead wire/cable does not contain inhibitor, and therefore can be processed using one of two methods, granulation or chopping – these methods ensures that FPL receives the greatest value

• Submarine cable, which can contain lead sheathing is placed in a lined, covered container

Dismantling

Hardware and other assorted metal materials sent to CRS are sorted by type and whether or not the item can be reused or refurbished. If they are, then these items are directed to the refurbishment area. If not, then they are broken down and the components are managed or sold accordingly.

Refurbishment

Hardware is the primary material refurbished and returned to inventory for reuse and deployment. The refurbishment process may include the use of bead blast to remove oxidation from the item. Efforts are taken to reduce the potential toxicity of the bead blast waste to prevent generation of a hazardous waste by strategically monitoring machine runtimes and routinely changing the blast media. A significant portion of hardware received is refurbished.

Streetlight Warranty Assessment and Refurbishment
Streetlights less than 5 years of age are assessed for warranty. If the unit tests "good" during this process, then it is refurbished and put back into inventory. All other units are claimed as warranty and/or dismantled. Streetlights greater than 5 years are automatically dismantled.

Corporate Recycling
Meters are sorted by type and packaged for sale to recycling vendors. Cardboard is baled and sold in truckload quantities. Polyethylene plastics (HDPE, LDPE, HWLDPE, XPE) from wire jacket and underground bore pipe is baled and sold for recycling.

WASTE MANAGEMENT
Material that cannot be refurbished, scrapped, or recycled is ultimately managed as waste. Items which have been identified as environmentally sensitive are disposed according to federal, state and local rules and regulations. Examples of materials managed are:

- Spent aerosol cans
- PCB >50 ppm contaminated oil, equipment, soil or debris
- PCB- street light capacitors/electrical ballasts
- Waste paint related material
- Spent bead blast
- Expired/unused product
- Non-friable asbestos
- Non-PCB electrical capacitors
- Sulfur hexafluoride (SF-6) Gas
- Lamps and High Intensity Discharge (HID) lamps
- Batteries
- Mercury containing devices
- Treated wood

FUTURE PLANS
Any material can potentially be recycled provided CRS can find an industry that is willing to purchase it and process it into another useful product. CRS is constantly looking at incoming materials to see if any new opportunities exist.

REQUIREMENTS FOR EFFICIENT OPERATION OF CRS
It is imperative that the salvage and recycling efforts between CRS, the service centers and other FPL facilities be coordinated. For efficiency, material must be presorted by kind when received. Tubs, racks, and pallets that contain mixed material require cumbersome hand sorting. Materials that are presorted can be easily processed and the shipping tub or rack promptly returned.

All shipping containers coming to CRS MUST have the point of origin accurately identified, and all drums received at CRS MUST be properly marked and labeled (refer to *FPL-Internal Shipping Guidelines*).

Transportation of DOT-regulated material or waste must be coordinated with a FPL approved vendor. Trash should be disposed of locally. CRS should not receive any items that are not identified in the *Shipping Guidelines* without prior approval by CRS. The Local Area

Environmental Coordinator (AEC) will assist in the disposal of other sensitive waste items that are not outlined in the *Shipping Guidelines*.

The ***FPL-Internal Shipping Guidelines*** (Appendix B) provides a current list of items being collected and where each is to be sent – CRS or RMF. These *Guidelines* are updated annually and can be found for reference on the Juno Environmental internal website. Also outlined in the *Guidelines*, are recommendations for the type of container in which to collect the material. These recommendations should be followed unless the material could be more effectively collected and sent in another form or fashion. Lastly, the following section will provide things to consider when setting up a collection area at a service center and/or storeroom.

SERVICE CENTER/STOREROOM RECYCLING AND WASTE COLLECTION AREAS

The layout of the recycling area in the service center is an important aspect of the program. Since each service center is unique, the actual footprint will vary from location to location.

The following should be considered for a successful recycling area:

• The recycling area needs to be accessible to trucks and compatible traffic patterns of the service center.
• Dumpsters lower than eye level should be considered so contents can easily be examined.
• Inspect containers regularly. A clean, organized area will make material separation easy for the user.
• Pallets, blue tubs, racks and drums should be organized with fork lift accessibility in mind.
• Drums should have drum covers to prevent water intrusion
• Container contents should be marked with removable labels. Attach labels with things such as hooks, magnets or tape.
• Inspect containers before sending to CRS or RMF A minimum of containers with mixed material or trash should be sent.
• All containers sent to CRS or RMF should be clearly marked point of origin, contents and properly label.
• Manage dumpsters. Dumpsters must be full before pickups. Inquire about different container sizes and pick up options available.

APPENDIX A

NEXTERA ENERGY CORPORATE ENVIRONMENTAL POLICY	NEE-ENV-2015 - Corporate Environmental Policy
Policy Number/Title:	
Function:	Environmental (ENV)
Date Approved:	05/01/13
Approver:	Randall R. LaBauve, Vice President Environmental Services

Scope

This policy outlines NextEra Energy, Inc.'s responsibilities in support of its commitment to environmental protection and stewardship.

Employees should also refer to internal business unit environmental management systems and guidelines.

Policy

At NextEra Energy, Inc., we are committed to being an industry leader in environmental protection and stewardship, not only because it makes business sense, but because it is the right thing to do. Our commitment to compliance, conservation, communication, and continuous improvement fosters a culture of environmental excellence and drives the sustainable management of our business planning, operations, and daily work.

In accordance with our commitments to environmental protection and stewardship, NextEra Energy, Inc. endeavors to:

Comply

• Comply with all applicable environmental laws, regulations, and permits
• Proactively identify environmental risks and take action to mitigate those risks
• Pursue opportunities to exceed environmental standards
• Participate in the legislative and regulatory process to develop environmental laws, regulations, and policies that are technically sound and economically feasible
• Design, construct, operate, and maintain our facilities in an environmentally sound and responsible manner

Conserve

• Prevent pollution, minimize waste, and conserve natural resources
• Avoid, minimize, and/or mitigate impacts to habitat and wildlife
• Promote the efficient use of energy, both within our company and in our communities

Communicate
• Communicate this policy to all employees and publish it on the corporate website
• Invest in environmental training and awareness to achieve a corporate culture of environmental excellence
• Maintain an open dialogue with stakeholders on environmental matters and performance

Continuously Improve
• Establish, monitor, and report progress toward environmental targets
• Review and update this policy on a regular basis
• Drive continuous improvement through ongoing evaluations of our environmental management system to incorporate lessons learned and best practices.

http://eweb.fpl.com/global/policies/Environmental%20(ENV)/ADM-112.shtml?company=

APPENDIX B

FPL-INTERNAL SHIPPING GUIDELINES: http://eweb.fpl.com/bunit/jes/library.shtml

III. WASTE TYPES GENERATED, EXPETED QUANTITIES, WASTE ACCUMULATION AND DISPOSAL

A. Waste Types and Expected Quantities

Waste Types and expected quantities are presented in the following Table 1, which also contains a summarization of on-site waste management methods.

Section 1 of this table list RCRA Regulated Wastes (hazardous wastes) that are counted in the monthly status of the Site.

Section 2 depicts Toxic Substance Control Act (TSCA) Regulated Wastes (PCB regulated). These wastes are not counted in the monthly RCRA generation at the Site.

Section 3 depicts used mineral oil / used oil and used oil filters regulated under the State of Florida Used Oil Rule. These wastes are not counted in the monthly RCRA generation at the Site.

Section 4 depicts those environmentally sensitive materials generated or managed on site that are either non-regulated or exempt. These include mercury-containing lamps, and devices, lead acid batteries, ni-cad batteries, lithium batteries, E-waste (circuit boards).

TABLE 1
WASTE TYPES QUANTITIES

TABLE 1-WASTE TYPES QUANTITIES			
Waste Type	**Expected Volume**	**On Site Management Method**	**Disposal / Recycle**
Section 1 - (RCRA Controlled)			
Central Reclamation & Salvage			
1.. Bead Blast	1,600 lbs. annually	Cleaning of electrical connectors and distribution line components	RCRA Hazardous Waste Disposal
2. Aerosol Cans	10,000 Lbs. annually	Collect evaluate on site waste. Redeployed if it can be still be used.	Generated Waste is sent to Approved Hazardous Waste Facility for incineration.(RCRA TSD)
3. Unused expired product	1,500 lbs. annually	Collect evaluate on site waste. Redeployed if it can be still be used.	RCRA Hazardous Waste Disposal
4. Waste Paint Related Material	2,000 lbs. annually	Collect evaluate on site waste. Redeployed if it can be still be used.	RCRA Hazardous Waste Disposal
5.Parts Washer Filter Media/Solution	200 lbs. annually	Collect evaluate on/off site waste	RCRA Hazardous Waste Disposal

2/26/2019

TABLE 1
WASTE TYPES QUANTITIES (Continued)

TABLE -1- WASTE TYPES QUANTITIES (Continue)

Waste Type	Expected Volume	On Site Management Method	Disposal / Recycle
Section 2 - (TSCA Controlled) Central Reclamation & Salvage			
1. PCB Small Capacitors in Street Light Heads	1,500 lbs. annually	Segregate at Regulated Materials Facility and temporarily store in DOT approved Drums	Shipped off site for incineration to approved vendor.
2. Used Mineral Oil > 50 < 500 ppm PCB's	20,000 gallons annually	CRS- Annex III Storage 6000 gallons tank-Temporary Storage On-site	Shipped off site for incineration to approved vendor.
3.Power Generation Central Power Generation Central-TSCA Lab Samples	2,000 lbs. annually	RMF- Annex III Storage-Temporary Storage in DOT Drums	Shipped off site for incineration to approved vendor.
4.Power Delivery spill clean up debris -PCB>50 ppm Soil/ Debris	1,500 lbs. annually	RMF-Annex III Storage-Temporary Storage in DOT Drums	Shipped off site for incineration to approved vendor.

2/26/2019

TABLE 1
WASTE TYPES QUANTITIES (Continued)

TABLE 1- WASTE TYPES QUANTITIES (Continued)

Waste Type	Expected Volume	On Site Management Method	Disposal / Recycle
Section 3 - Used Oil/ Oil Filters			
CRS and RMF 1. Used Mineral Oil	18,000 gallons at any one time	Used Oil stored in 4 different Registered Tanks.	Off-site Recycling
Automotive Engineering Center 2. Used Oil and New Oil	1,200 gallons per year.	Stored in Oil Storage Area in multiples size of Tanks	Off-site Recycling
3. Used Oil Filters	5 drums per year	Collected then Drained at Work Site/ Filters send off for recycling	Off-site Recycling
Section 4 - Universal Waste			
Power Delivery			
1. HID-Lamps/Mercury Vapor Bulbs and lamps	70,000 lbs. annually	Bulbs/lamps are consolidated on-site at the Regulated Materials Facility for shipment to an approved recycler in accordance with FAC 62-737	Off site Recycling
2. Mercury Containing Devices	75 lbs. per year	Collection/Storage/Management and Off-site Recycling in Accordance with FAC 62-737	Off site Recycling
3. Lithium Batteries	1,000 lbs. per year	Collection/Storage/Management and Off-site Recycling in Accordance with FAC 62-737	Off site Recycling
4. Lead Acid Batteries	Up to 170,000 lbs. per year.	Management in Accordance with Lead-Acid Battery Reclaiming Regulations (Sub part G)-See Appendix K	Off site Recycling

2/26/2019

TABLE 1
WASTE TYPES QUANTITIES (Continued)

TABLE 1-WASTE TYPES QUANTITIES (continued)

Waste Type	Expected Volume	On Site Management Method	Disposal / Recycle
Section 4 - (Environmental Sensitive Material Continued)			
Power Systems (continued)			
5. NI-Cad Batteries	1,500 lbs. per year	We Collect & Ship all Ni-Cad batteries to a recycler for processing as part of Universal Waste Program	Disposal/Recycle
6. Electronic Equipment	10,500 lbs. annually	Accumulation of electronic equipment	Consolidation & shipment to a recycler
7. Capacitors Line type Non-PCB	275,000 lbs. per year	Consolidation at Facility and shipped to a metal reclaimed for incineration and metal recovery	Send for disposal to current approved vendor

2/26/2019

B. Summary of Monthly Hazardous Waste Generation

The calculated average generations of hazardous waste (RCRA) from all locations on the PWP site, on a monthly basis are as follows:

Program	80 KG / month

The calculated average generations of hazardous waste (RCRA) from all FPL & NextEra Energy "Very Small Quantity Generator (VSQG) Waste Collection Program", on a monthly basis are as follows:

VSQG Program	975 KG / month

C. Hazardous Waste Accumulation Procedures and Container Labeling

Wastes are accumulated in containers that are in good condition and are compatible with the type of waste. All waste containers are kept closed except when adding or transferring wastes. Each waste type is segregated and controlled in a manner preventing any mixing of unlike waste.

Like wastes are accumulated in Satellite Accumulation Area's Containers, near each waste point-of generation. Satellite Accumulation Area's Containers are labeled with the words "Hazardous Waste" and/or designated with the waste name (i.e., "Paint Related Waste" or "Ignitable Waste"). Areas where Satellite Accumulation Containers are located have "No Smoking" signs conspicuously post in flammable and combustible areas. The facilities that have "Satellite Accumulation Area" and / or "Central Accumulation Area" areas are indicated on the Site Map in Figure 4.

When a maximum of 55 gallons of waste is accumulated at a satellite location, hazardous waste labels are completed, including an accumulation start-date, and affixed to each container which is to be shipped for off-site disposal. When waste volume reaches 55 gallons at a satellite location, the container is transferred to the **Central Accumulation Area location.** This transfer will be made within 72 hours of reaching the 55-gallon maximum. Wastes are shipped off-site for disposal within 90 days (as LQG) or 180 days (as SQG) of the accumulation start-date in the Central Accumulation Area location.

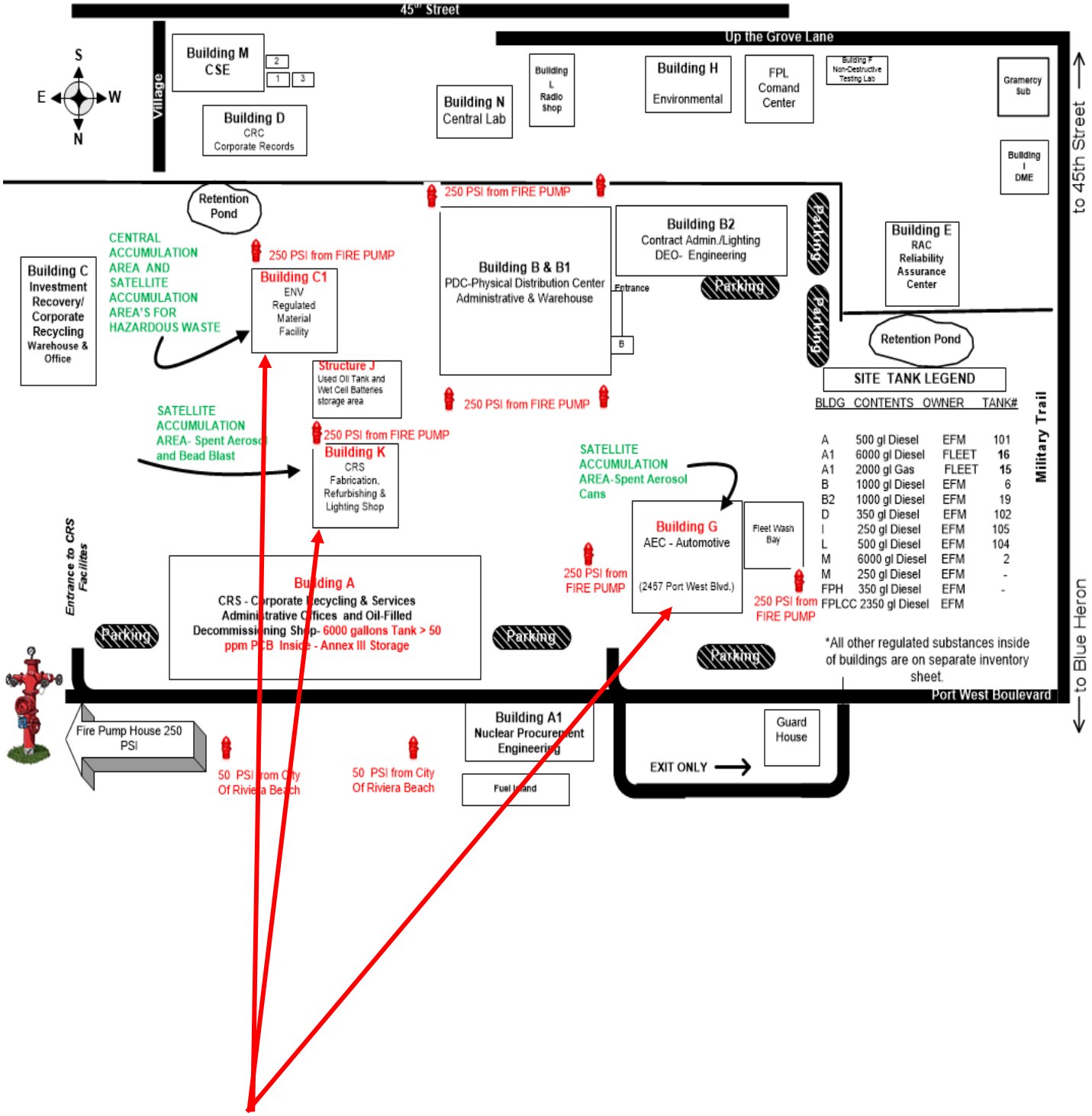
At Satellite Accumulation areas and Central Accumulation Area location, aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.

D. Hazardous Waste Disposal and Record Keeping Procedures

Under the Hazardous Waste Management Regulations, waste stream knowledge and / or a one-time waste characterization of a specific waste stream, knowledge, and or analytical waste characterization are adequate to meet Transportation and Disposal Requirements. With strict waste stream segregation, the number of chemical analyses to determine if wastes are hazardous is minimized. Information on waste disposal procedures is coordinated with hazardous waste disposal vendors with guidance from the Program Coordinator.

Records of hazardous waste generated at each location described in II.-B above is maintained, including wastes shipped off-site for disposal and / or recycling. Records include both the waste type(s) and the quantities generated.

FIGURE 4
SITE MAP DELINEATING
"CENTRAL ACCUMULATION AREA AND SATELLITE ACCUMULATION"



"Satellite Accumulation" and "Storage-for-Disposal" Areas are located in the building labeled "C-1" (Regulated Materials), "G" (Automotive Maintenance Facility) "K" (Fabrication) on the site map. Satellite accumulation and Storage for Disposal areas are indicated by arrows. *Note: only Building "C-1" is the "Central accumulation area"* building, the remaining, "G", and "K" are Satellite Accumulation Area's.

All hazardous wastes to be shipped off-site for disposal is packaged in DOT approved containers and properly manifested for shipment. Hazardous wastes are transported and disposed of only by RCRA (hazardous waste) permitted transporters, at permitted disposal facilities. All manifesting and other transportation and disposal records are maintained at the appropriate generating facility (Regulated Materials Facility (RMF) and Automotive Maintenance Facility) for at least three (3) years (See Appendix F for a sample manifest).

E. Manifest Discrepancy Reporting

A generator of greater than 1000 kilograms of hazardous waste in a calendar month, who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility with **35** days of the date the waste was accepted by the initial transporter must contact the transporter and / or the owner or operator of the designated facility to determine the status of the hazardous waste. If the generator has not received the return manifest in **45** days then the generator must submit a legible copy of the manifest, with some indication that the generator has not received confirmation of delivery, to the EPA Regional Administrator for the region in which the generator is located. (In the case of Port West Properties Site, this notification would be made to the Local Department District Office, See Table 2.)

NOTE: The submission to the DEP need only be a handwritten or typed note on the manifest itself, or an attached sheet of paper stating that the return copy was not received.

IV. VERY SMALL QUANTITY GENERATOR (VSQG) WASTE CONSOLIDATION PROGRAM

FPL operates a Very Small Quantity Generator (VSQG) Waste Collection Program under the new improvement rule 40 CFR 262.14 (a) (5) (viii). Wastes are collected from well over 60 of the companies VSQG status generators (mostly service centers, Power Plants and office buildings) where those generators do not exceed the 100-kilogram maximum generation level as specified in 40 CFR Table 1 to 262.13

Potential hazardous waste is accumulated at each eligible company VSQG, but never to the maximum accumulation limit of 1000 kilograms. The waste material is shipped using a simple "Bill of Lading" via the Contract / FPL Transportation System and collected at Port West Properties (PWP) Regulated Materials Facility. The materials managed in this manner are normally, only spent aerosol spray cans (See Appendix L), paint wastes, and solvents. Shipment and subsequent management of these wastes are detailed in the Environmentally Sensitive Materials Matrix (Appendix C).

Copies of the Bills of Lading (with supporting documentation) act as the record of generation by the participating VSQG facility and as the record of receipt for the RMF. Upon receipt at the RMF, the wastes are managed as if they are generated at the RMF. In other words, the wastes are segregated or combined and those portions that cannot be recycled (i.e., the residual fluid in spent aerosol spray cans) are collected in satellite accumulation and disposed of as hazardous waste.

V. WASTE RECYCLING PROGRAMS

FPL runs several waste recycling programs at CRS. These programs encompass wire reclamation for copper and aluminum recycling, paper and cardboard recycling, as well as other recyclable commodities. There are several programs at the CRS that concern wastes that, if they were disposed of, might be considered hazardous wastes. However, as recyclable entities, they are managed as non-hazardous wastes under the appropriate State and Federal Guidelines. These are as follows:

A. Fluorescent Lamps (including HID's and MCD's)

RMF is the designated consolidation point for FPL of field collected spent fluorescent lamps. The program meets all generator requirements of FAC 62-737 (Appendix J) and collects the lamps onsite for pickup by a designated Mercury Recovery Facility (Approved Vendor). Lamps are managed to prevent breakage and the immediate containment of any release that may occur due to accidental breakage. Employees are familiar with the proper packaging and the containment and cleanup of any accidentally released material.

HID bulbs are collected throughout the Company and brought to CRS and The Regulated Materials Facility arranges the proper disposal to a designated, permitted, mercury recovery facility.

Mercury containing devises (MCD's) such as mercury wetted switches and mercury relays are collected at CRS during the disassembly of circuit boards. Only small quantities of these switches are generated (less than a five-gallon container every 6 months), but they are held at the Regulated Materials Facility for shipment to a designated permitted mercury recovery facility.

B. Lead Acid Batteries

Many of the Company's spent lead acid batteries are collected at RMF under the auspices of 40 CFR Subpart G, 266.80(a)(2)(3), see Appendix C for detailed procedures on the packaging and shipping of lead acid batteries from field locations into RMF for recycling, (See 40CFR 266.80 for the regulatory reference). After being received on site, the batteries are held in temporary storage until enough weight has accumulated to facilitate pickup by, and shipment to, a secondary lead smelter (i.e., Sander's Lead).

C. Ni-Cad Batteries

Ni-Cads are collected from FPL and consolidated at the Regulated Materials Facility and shipped to INMETCO.

D. Lithium Batteries

Are collected from FPL facilities and consolidated at the Regulated Materials Facility and shipped to approved vendor for recycling.

E. Electronic Scrap:

Collected at FPL facilities- The Electronic Equipment are collected shipped to CRS and held for shipment to an approved recycler.

VI. PROGRAM MANAGEMENT

A. Overall Program Coordination

The overall program coordination is the responsibility of the Regulated Material Facility reprentative with the Environmental Services Group. As the Program Coordinator, he / she interfaces with the two (2) major waste generators on this site (CRS, and Automotive) and with all other operating units on the site to ensure compliance with applicable Federal, State and Local Environmental Regulation for Hazardous Waste and Hazardous Materials Management. He / she, and / or their staff, represents the Site in meetings and negotiations with Federal, State and Local agencies, periodically performs Site waste audits to monitor performance and recommends the appropriate "good management practice" for waste handling and disposal.

The Program Coordinator interfaces with the Corporate Environmental Services Department to stay current with new and / or changing environmental regulations and provides operating unit input to active legislative initiatives and regulatory issues. This position is also responsible for the Very Small Quantity Generator Program, as it relates to the management of waste at both the CRS and field locations (Power Plants, Solar Plants and Service Centers). He / she also act as the "Primary Emergency Coordinator" for the Site. In his / her absence, the program responsibility falls to the first or second alternate, as shown in Table 2.

B. Daily Program Operations

The supervisor of the Regulated Materials Area has overall responsibility for daily implementation of program operations. He / she is the major holder of site records for waste management and disposal profiles, and works closely with the Corporate Program Coordinator to ensure compliance with applicable Federal, State and Local environmental regulations for hazardous waste and hazardous materials management and the implementation of "good management practice".

On a daily basis, he / she or one of their employees, walks throughout the PDC Site, using the Site Check List (See Appendix E) or an electronic device to evaluate regulatory compliance and best management practices. Under the direction of the Corporate Program Coordinator, he / she tracks and monitors the monthly generation of hazardous waste from all locations on the Site, to ensure compliance with Federal, State and Local regulations.

VII. CONTINGENCY PLANNING PREPAREDNESS AND PREVENTION

A. **Arrangements with Local Authorities**

Large Quantity Generators of hazardous waste are required to make emergency response arrangements with local authorities. For the Port West Properties Site Facilities, these authorities / agencies are identified in Table 2. Arrangements with local authorities was accomplished by inviting authority representatives to the facility and familiarizing them with the areas where hazardous waste may be generated and handled, as well as all other aspects of hazardous waste management operations. At the time of the offering of a visit, a Checklist (Figure 5) was used to document that arrangements have been pursued and / or made with the authorities / agencies.

TABLE 2
PORT WEST PROPERTIES SITE
HAZARDOUS WASTE EMERGENCY COORDINATOR
AND EMERGENCY TELEPHONE NUMBERS

	CONTACT NAME	PHONE NUMBER
Emergency Coordinator 1:	Porfirio A Cevallos	Office 561-845-4973
		Home 561-309-8095
		Cell 561-662-7536
Alternate Emergency Coordinator 2:	Jeff Wade	Office 561-681-3135
		24/7- 561-640-2515
		Cell 954-599-0317
Security Office for Port West Properties Site	Main Gate	561-845-4900
		561-640-2120
FPL Environmental Services Department		
Hazardous Waste Issues	Tomey Tuttle	Office 561-691-7050
		Cell 772-812-5464
Oil Spills into Water Issues	Rory Rahming	Office 561-691-3961
		Cell 786-427-7437
FPL Governmental Affairs Department	Don Kiselewski	Office 561-691-7948
Local Government and Wellfield Ordinance		
FPL Corporate Security		561-694-5000
Fire Department		
Riviera Beach Emergency	Chief Regional K.Duren	911 or 561-712-6550
600 West Blue Heron Blvd, Riviera Beach Fl, 33404		or 561-845-4110
Palm Beach Emergency	PBCFR Station 17	911 or 561-694-8130
8130 N Jog Rd, West Palm Beach FL, 33401	Battalion Chief Mike wells	911 or 561-233-1395
		or 561-308-8017
Police Department		
Riviera Beach Emergency	Chief Michael Madden	911 or 561-845-4128
600 West Blue Heron Blvd, Riviera Beach Fl, 33404		
Palm Beach Police	Chief Nicholas Caristro	911 or 561-838-5454
345 South County Road Palm Beach, FL 33480		
St. Mary's Hospital, 45th Street		
Emergency Coordinator-Director of Security	Robert Fore	Cell-540-798-6792
901 45th Street Riviera Beach ,FL 33407		
Palm Beach County HRS		
Environmental Manager(Department Director)	Deborah Drum	561-233-2400
Florida Department of Environmental Protection-Environmental Manager	Norva Blandin	Direct- 561-681-6728
Southeast District—3301 Gun club road MSC 7210-1 WPB, FL 33406-3007	Secretary	561-681-6600
Florida Department of Environmental Protection ***Head of Emergency Response.***	Kenton Brown	561-681-6767
State Warning Point		850-413-9911
Florida Div Emergency, State Watch Office		1-800-320-0519
National Response Center (Federal)		800-424-8802

FIGURE 5
CHECKLIST FOR EMERGENCY-RESPONSE AUTHORITY
TOUR OF THE PORT WEST PROPERTIES SITE COMPLEX

INSPECTING AUTHORITY: _____

A. Offer to Local Authority for Visit

Offer made to: _____ Date: _____

Offer made by: _____

Response: _____ Made By: _____ Date: _____

B. Site Facilities Tour (FPL location symbol indicates area visited, or where record was observed)

1) Satellite Accumulation Areas_____
2) Storage-for-disposal Area _____
3) Emergency Response Equipment _____
4) Communications Systems_____

   (Loudspeakers, telephones, alarms, video surveillance, fire protection systems, etc.)
5) Security System _____

C. Records and Response Procedures Review

1) Contingency Planning _____
2) Hazardous-Waste Container Labeling _____
3) Training Records _____
4) Manifesting Records _____

_____

Visiting Officials Signature and Title Date

_____

FPL Personnel Conducting Tour and Title Date

B. **Responsibilities of the Emergency Coordinator**

The Emergency Coordinator or their designed is responsible for coordinating all activities regarding implementation of emergency response activities. The Emergency Coordinator or designee is available to respond to emergencies on a 24 hours' basis. The names and telephone numbers of the Emergency Coordinator and designees are show on Table 2. The primary Emergency Coordinator is normally at the facility from 7:00 A.M. to 5:00 P.M. The Emergency Coordinator and his / her designees are familiar with emergency response activities described in this Plan and are familiar with all facility operations, the location of all records, the facility layout and the location and characteristics of the regulated wastes.

The offices of the Emergency Coordinator and his / her alternates are in Building C-1 or H: During any event covered by this Plan, building "C" offices will function as the "Incident Command Post". This area is located away from the facilities that store or generate hazardous waste, and provides support services and communication links that are required during an emergency response. Copies of waste profiles and chemical information on concerning onsite waste generation and storage are kept in these offices.

In cases of all reported emergencies, the Emergency Coordinator will assess the severity of any hazardous waste incident and determine the appropriate action necessary to adequately respond. If an incident requires off-site emergency assistance, appropriate emergency response groups will be contacted by the Emergency Coordinator. The Emergency Coordinator has the authority to commit the necessary onsite and / or contract resources during an emergency. A list of the agencies and groups, which may be notified in the event of an emergency are, listed on Table 2. A list of onsite emergency response equipment is shown in Table 3. A list of the response contractors is given in Table 4.

TABLE 3
EMERGENCY RESPONSE EQUIPMENT

A. Fire extinguisher and Automatic Sprinkler System

The locations of the fire hydrants are noted on Figure 3, the Site Schematic. Automatic Sprinkler Systems and fire extinguisher are located in facilities throughout the complex, per the applicable fire protection codes, including those facilities where hazardous materials are stored: Alarm tested quarterly by Simplex and the sprinklers are tested annually for water flow and pressure

Central Reclamation & Salvage-Area
East Fleet service –Building
Regulated Materials Facility-Building

B. Communication Systems	**Locations**
1) Closed Circuit Television	Throughout Building and Grounds
2) Telephone System	Throughout Building and Grounds
3) Public Address System	Throughout Building and Grounds
4) Fire Alarm System	Throughout Building and Grounds

C. Spill Control Equipment

Location	Type
1) Regulated Materials Building	Spill Response Cart Oil Absorbent Pads and boom Overpack drums (95 gallon) Acid neutralization materials Fume control hood and area "Mercury Spill" cleanup kit
2) Automotive Engineering Center	Oil Absorbent Materials Acid neutralization materials
3) Transformer Decommissioning Area	Oil Absorbent Clay Oil Sorbent Boom Oil sorbent Pads

TABLE 4
EMERGENCY RESPONSE CONTRACTORS

- **SWS Environmental Services.**
  600 Grand Panama Blvd.

  Panama City, FL 32407
  (800) 852– 8878
  Contact Person: Mike Morris (954-957-7271)

- **SWS Environmental Services.**

Progressive Environmental Services Inc.

FPL's East area 24 hour :(Hazardous Waste, Mineral Oil, Hydraulic Oil, and Motor Oil)

561-640-2515 or
561-688-0542

The following types of incidents may warrant implementation of the Contingency Plan:

- A fire in a hazardous waste storage area
- An uncontrolled spill or leak of hazardous waste
- An explosion in or adjacent to a hazardous waste storage area

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or his / her designee) will immediately:

1) Activate internal facility alarms or communication systems to alert facility personnel
2) Notify appropriate State or Local agencies with designated response roles, if their assistance is required
3) Identify the character, exact source, amount, and area extent of any released material and assess the possible hazards to human health or the environment that may result from the release. The Emergency Coordinator may use the windsock attached to the Regulated Materials Building, designated "C-1" on the Site Plan, to determine wind direction and potential spread of any airborne released materials.
4) Fire/Explosion Event Specific Response Procedures for the Emergency Coordinator

If the Emergency Coordinator determines that the emergency situation could affect areas outside of the facility, and will contact the appropriate State and Local authorities and the National Response Center with the following information:

1) Name and telephone number of reporter
2) Name and address of facility
3) Time and type of incident
4) Name and quantity of materials involved
5) Extent of injuries, if any
6) Possible hazards to human health and the environment, outside the facility

When appropriate, the Emergency Coordinator will direct the termination of activities in the incident area and attempt to keep the release contained in a manner preventing or minimizing the likelihood of fire and / or other detrimental environmental or human health and safety impact.
Immediately following an emergency situation, the Emergency Coordinator will:

- Provide for the treatment, storage or disposal of any material recovered or contaminated from the release, fire or explosion.
- See that any material which is potentially incompatible with the released material from the incident area is removed or protected until cleanup procedures are completed
- See that all emergency equipment is cleaned and fit for its intended use before operation are resumed
- Notify the appropriate regulatory authorities that cleanup activities have been completed

Below are examples of event-specific response scenarios:

Fire / Explosion Event Specific Response Procedures for the Emergency Coordinator

- Sound emergency alarm or verbal alert
- Evacuate immediate area and stop all operations
- Notify the appropriate Emergency Contact Agencies (Table 2)
- Remove potential sources of ignition of fuel if possible
- Activate fire extinguishing equipment if practical and appropriate
- Contain area to prevent fire from spreading
- If unable to control fire or explosion, give the facility evacuation signal

Spill Response Event Specific Procedures

- Cease all operations which might in any way aggravate the situation
- Sound emergency alarm or alert personnel via telephone / paging system (if available) or by voice.
- Remove all potential sources of ignition and chemical interaction (incompatibles), if possible
- Begin spill response activities by:

  Consulting Section C of appropriate MSDS (section 6 on SDS) or waste profile for incompatibles, fire hazards; consult the MSDS (section 6 on SDS) for first aid procedure, if applicable blocking all probable routes of released material such as: like floor drains, sanitary sewer manholes, and storm sewer drains and manholes dike down-gradient sheet flow surround spill area with absorbent material

- Removing any remaining material from leaking container or system and place in clean container, or shutoff upstream valve. Over pack leaking drums if available. Place all used disposable cleanup equipment in over pack
- Absorbing spilled material with absorbent (i.e., oil dry \, absorbent pads). Place oil dry in compatible containers
- Securing the services of an FPL approved emergency response contractor to arrange for cleanup if the volume and / or type of material released cannot be safely handled by facility personnel
- Notifying appropriate State authorities and the National Response Center if spill is a reportable quantity (Table 2)
- Contacting appropriate agencies if spill migrates off-site (Table 2)
  Repairing or replacing leaking equipment – **DO NOT** place back into service until repairs or replacement is complete

Decontamination procedures:

All disposable clean up equipment will be placed in drums (with absorbent if possible) for proper disposal. Care will be taken to segregate waste types to the extent practicable and waste containers will be appropriately labeled.

Non-disposable equipment will be decontaminated and decontamination wastes packaged for disposal.

All recovered hazardous wastes and contaminated equipment will be disposed of only at a permitted hazardous waste disposal facility.

C. Emergency Response Equipment

Table 3 describes emergency response equipment and communication systems for the building complex. Emergency response equipment such as fire extinguishers, absorbent materials and small spill clean up kits are periodically inspected to insure that they are in working condition. The building fire protection systems are routinely monitored and tested to ensure optimal operability. The building complex utilizes the local municipal water systems thus; adequate water pressure is available to ensure maximum fire fighting capability.

D. Evacuation Plan

Evacuation plans are only required for those buildings that store hazardous wastes, the Regulated Materials Building (C-1), CRS Fabrication Shop (K) and the Automotive Engineering Center (G-EFS). Evacuation instructions and schematics are posted in each of these buildings, and the schematics are included in this document as Figures 6, 7, 8 and 9. Personnel "muster points" are shown on each of the schematics. In the event of a fire, hazardous material release or explosion within the facility, the Emergency Coordinator will determine if a facility evacuation is necessary. If the Emergency Coordinator determines that a facility evacuation is necessary, the following actions will be taken:

- The order to evacuate the facility will be given by the Emergency Coordinator via the facility's fire alarm and / or paging system and fire alarm, if necessary.
- All personnel will immediately shut down their present operation and proceed to the nearest evacuation exit. Doors to each office shall be closed upon exiting.
- The Emergency Coordinator or his / her designee will notify the Fire Department, Police Department, and other appropriate agencies that an evacuation has been initiated.
- No personnel will re-enter the facility unless authorized by the Emergency Coordinator or until the Emergency Coordinator has given clearance.

FIGURE 6
EVACUATION PLAN FOR THE
REGULATED MATERIALS BUILDING C-1

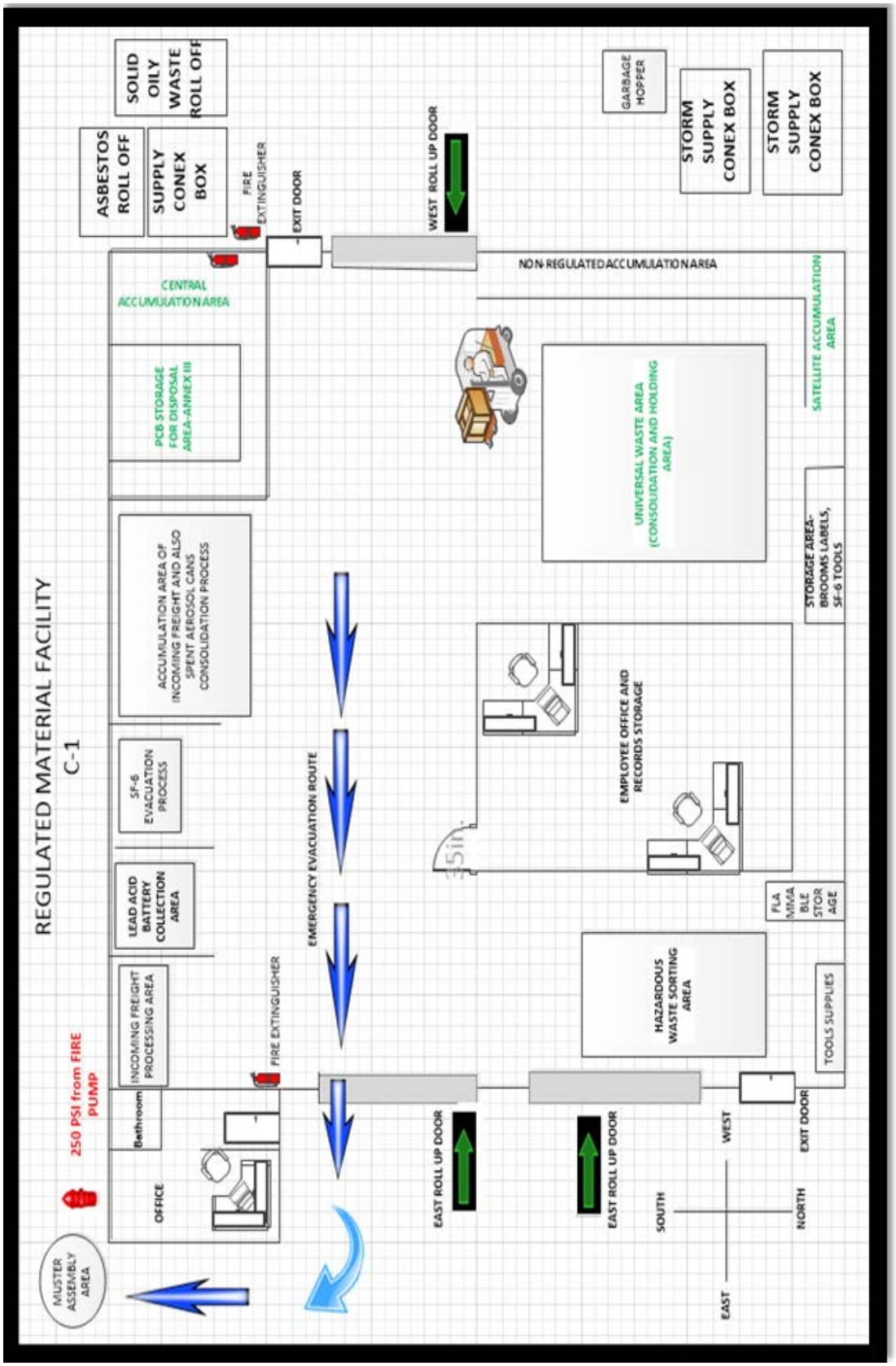


FIGURE 7
EVACUATION PLAN FOR THE
TX- DECOMMISSIONING BUILDING. A

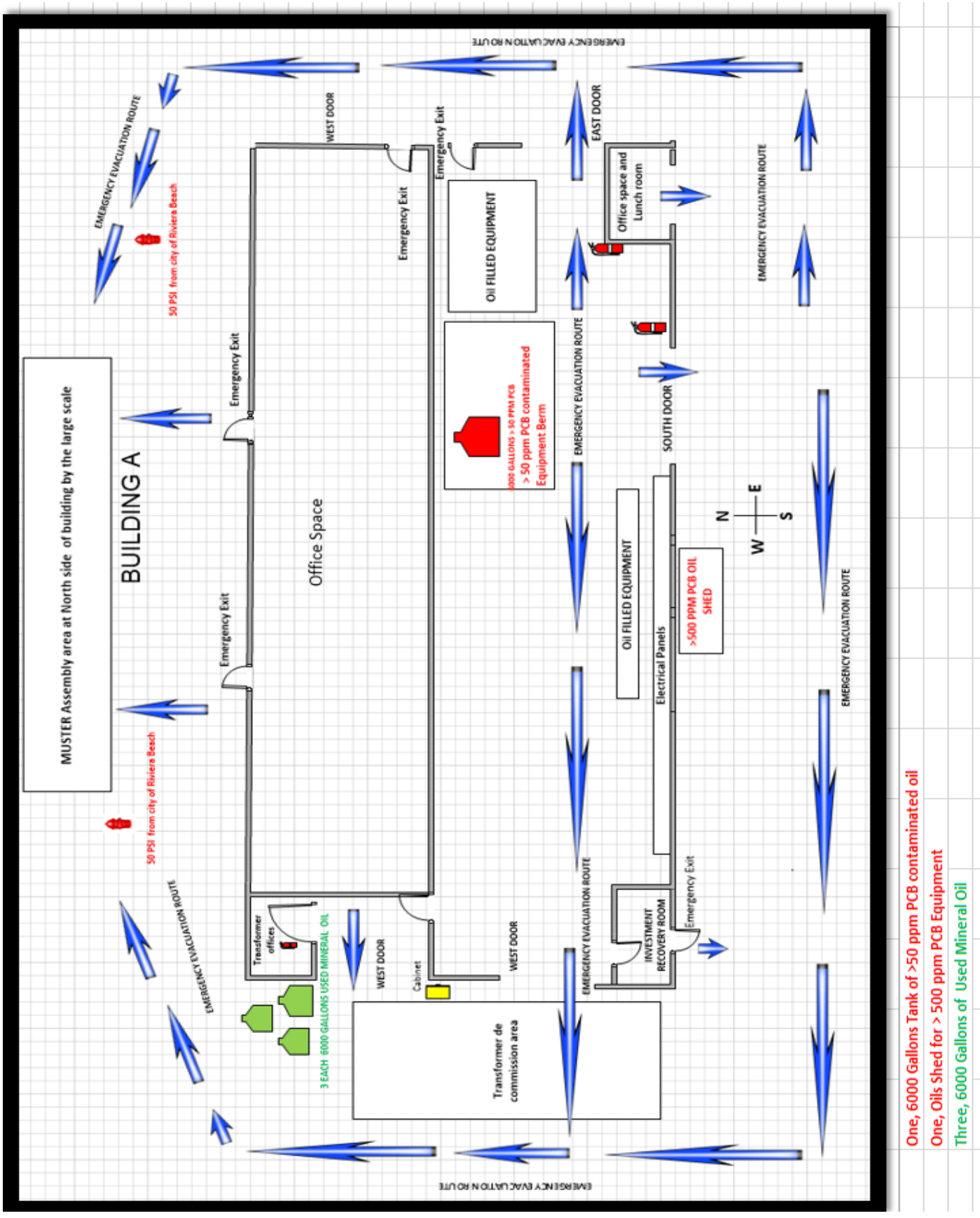


FIGURE 8
EVACUATION PLAN FOR THE
AUTOMOTIVE ENGINEERING CENTER-. G

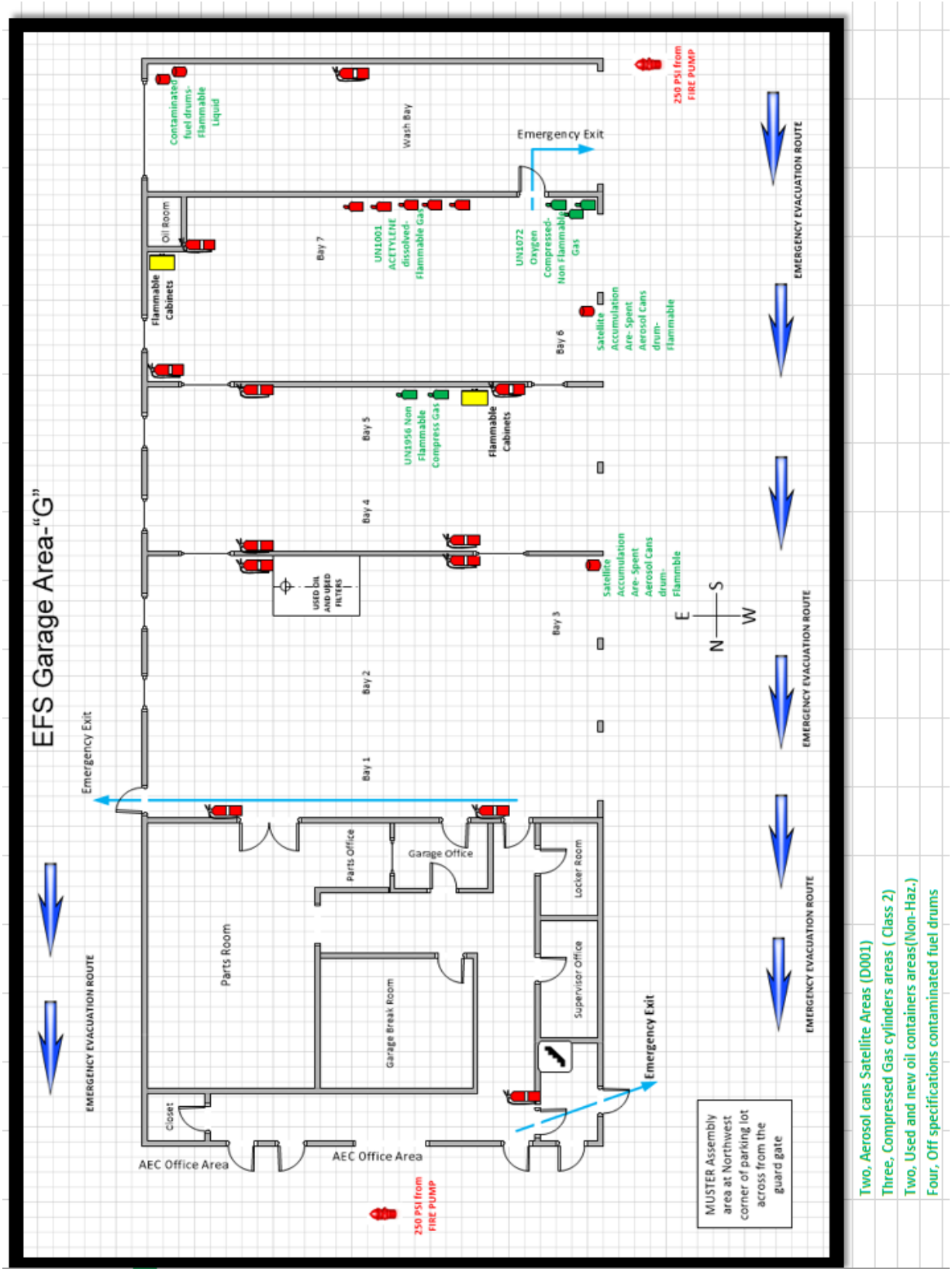


FIGURE 9
EVACUATION PLAN FOR THE
CRS FABRICATION BUILDING. K

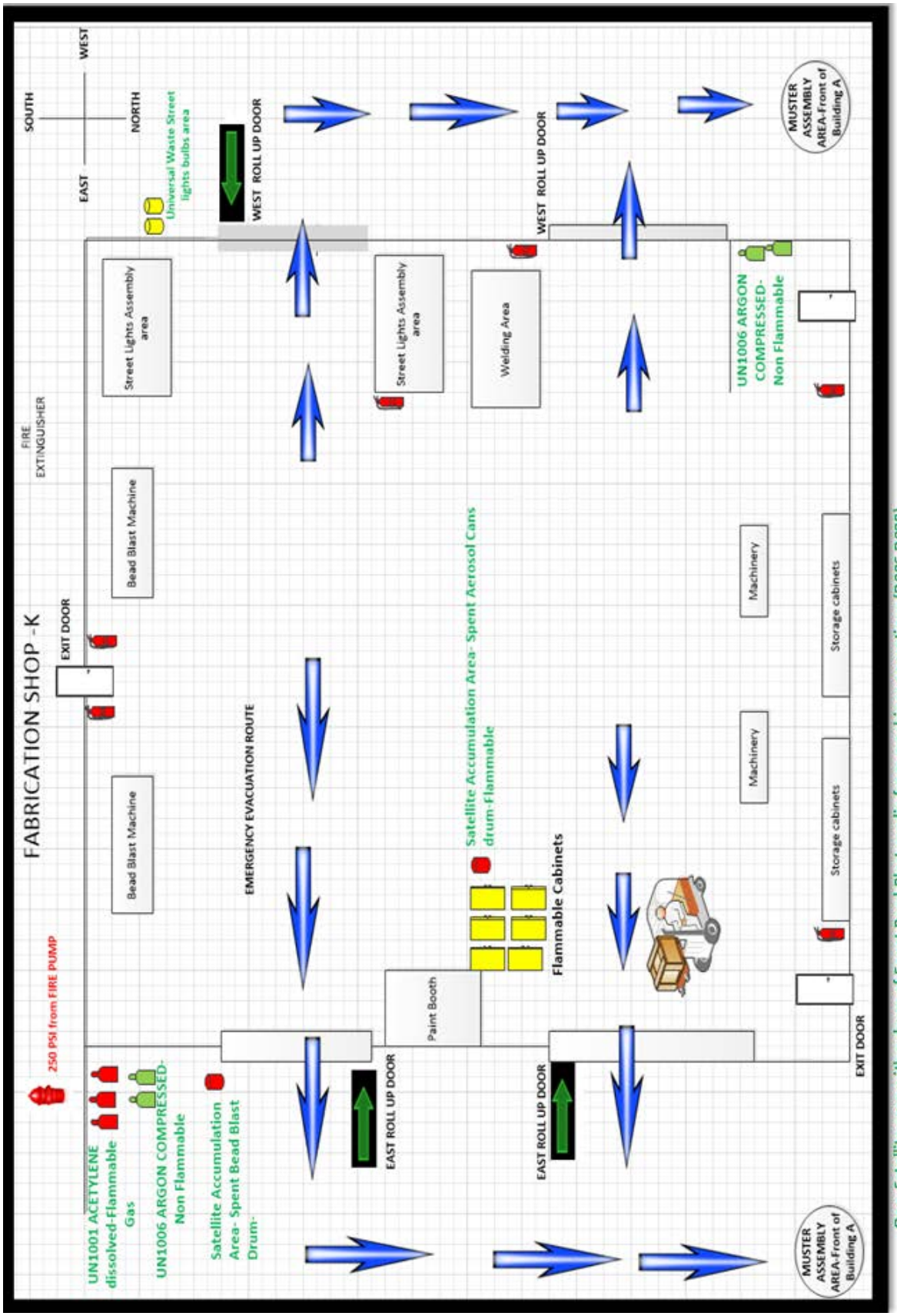
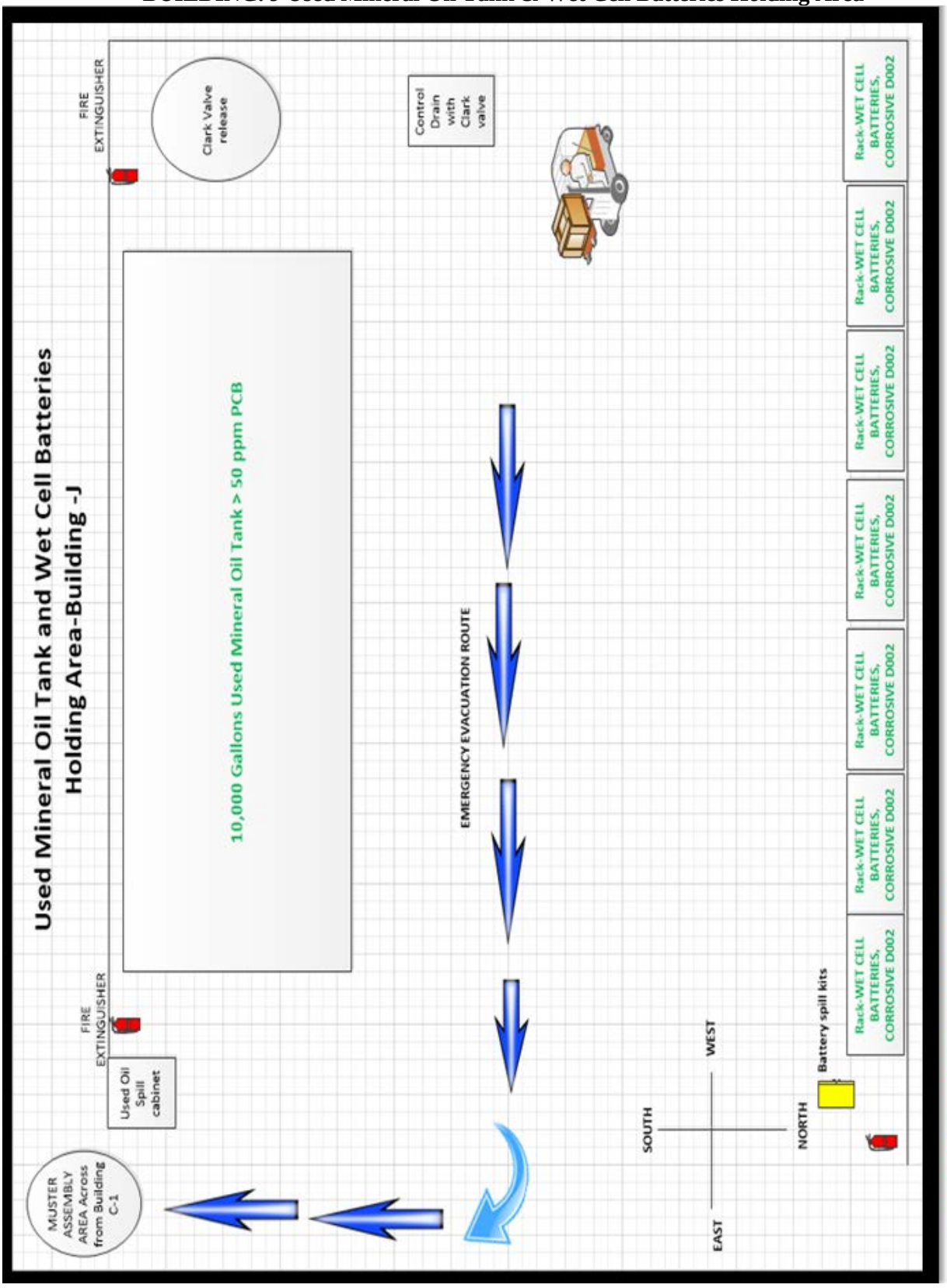


FIGURE 10
EVACUATION PLAN FOR THE
BUILDING. J Used Mineral Oil Tank & Wet Cell Batteries Holding Area



E. **Required Reports**

Any emergency requiring activation of the Contingency Plan will be reported in writing within fifteen (15) days to the Southeast District Office Florida Department of Environmental Protection (FDEP), if and / or when the facility becomes a Large Quantity Generator (LQG). As a SQG facility, only a courtesy phone notification is made to the FDEP.

The report will contain the following items:

- Name, address and telephone number of the owner or operator of the facility
- Name, address and telephone number of the facility
- Date, time and type of incident
- Name and quantity of hazardous waste related incident
- Extent and nature of injuries to facility personnel
- Assessment of actual or potential hazards to human health of the environment
- Estimated quantity and disposition of recovered material that resulted from the incident

A file of all reports submitted will be maintained at the facility for a period of at least three (3) years.

F. Hazardous Waste Management / Emergency Response Training

The Emergency Coordinator / Corporate Program Coordinator is responsible for ensuring that all employees at the facility who handle and / or are reasonably expected to handle and / or otherwise manage hazardous waste and associated required paperwork, are properly trained in hazardous waste management. The Emergency Coordinator who conducts any on site hazardous waste management training shall also have documentation demonstrating that he / she was trained in hazardous waste management. Training records, and copies of the training material used for on site personnel and the Emergency Coordinator(s), are maintained on site. When class examinations are given the exams and test results are also on file. Annual recurrent training is performed as appropriate, by the Environmental Services Department. Florida Power & Light also maintains a program of regular ongoing personnel training for Physical Distribution Center employees. In addition, new personnel are trained promptly upon being hired. This multi faceted training program meets the training requirements of an LQG program.

A select group of operating and supervisory personnel have additional training. These employees:

- Have received 40 hours of “Hazwoper Training”
- Attended an annual 8 hours “Hazwoper Refresher Class” to maintain their certification
- Attended the annual two (2) day “Hazardous Waste Management / RCRA Training” (as required by 40 CFR 265.16 for LQG’s) sponsored by Environmental Services.
- Attend “DOT Hazardous Material” class every 3 years as required by 49 CFR 172.702.
- Have knowledge of system operations
- Have knowledge of record keeping requirements

V. **FACILITY INSPECTIONS**

Areas and activities described in Sections II B and III B of the Plan will be inspected weekly. Table 5 has Specific Inspection Checklists, which will be used to document the inspections, including actions taken where deficiencies are found. These checklists are used as a comprehensive, detailed checklist to aid the facility in determining its regulatory conformance.

TABLE 5
PORT WEST PROPERTIES SITE COMPLEX
Hazardous Waste Inspection Checklist

RMF WEEKLY HAZ. WASTE SATELLITE/ CENTRAL ACCUMULATION AREA LOG

DATE : _____ TIME OF INSPECTION: _____

INSPECTOR: _____

STORAGE FOR DISPOSAL AREA- INSPECTION ITEMS	YES	NO
ARE DRUMS BUNGS AND TOPS SECURE?		
ARE DRUMS MARK AND LABELED PROPERLY? (HAZ. CLASS, ACCUMULATION START DATE)		
ARE DRUMS IN GOOD CONDITION? (NO LEAKS, BULGES, DENTS OR RUSTED)		
IS ISLE SPACE SUFFICIENT?		
IS ALL WASTE ACCUMULATED IN D.O.T. APPROVED CONTAINERS?		
IS WASTE PENDING LAB RESULTS CLEARLY MARK?		
ARE FLAMMABLE DRUMS GROUNDED?		
HAVE ALL DRUMS BEEN STORED FOR LESS THAN 90 DAYS?(LQG)		
IS FIRE EXTINGUISHER AVAILABLE?		
IS GENERAL HOUSE KEEPING IN ORDER?		

QTY of Drums Carried Over from previous week	QTY of Drums Added	QTY of Drums Sent for disposal.	Current Week Ending Balance

HAZARDOUS WASTE SATELLITE ACCUMULATION AREAS- INSPECTION ITEMS	YES	NO
ARE DRUMS BUNGS AND TOPS SECURE?		
ARE DRUMS MARK AND LABELED PROPERLY? (HAZ. CLASS, ACCUMULATION START DATE)		
ARE DRUMS IN GOOD CONDITION? (NO LEAKS, BULGES, DENTS OR RUSTED)		
IS ISLE SPACE SUFFICIENT?		
IS ALL WASTE ACCUMULATED IN D.O.T. APPROVED CONTAINERS?		
IS WASTE PENDING LAB RESULTS CLEARLY MARK?		
ARE FLAMMABLE DRUMS GROUNDED?		
HAVE ALL DRUMS BEEN STORED FOR LESS THAN 90 DAYS?(LQG)		
IS FIRE EXTINGUISHER AVAILABLE?		
IS GENERAL HOUSE KEEPING IN ORDER?		

QTY of Drums Carried Over	QTY of Drums	QTY of Drums Sent	Current Week Ending

DESCRIPTION OF OBSERVED CONDITION AND/OR ACTIONS TAKEN:

TABLE 5
PORT WEST PROPERTIES SITE COMPLEX
Hazardous Waste Inspection Checklist
(Continued)

EFS-WEEKLY HAZARDOUS WASTE SATELLITE ACCUMULATION INSPECTION LOG.xls

FLEET SERVICES-BLDG.- "G"							
WASTE AEROSOL CANS							
DATE : _____ TIME OF INSPECTION: _____							
INSPECTOR: _____							
HAZARDOUS WASTE SATELLITE ACCUMULATION AREA-INSPECTION ITEMS						YES	NO
ARE DRUMS BUNGS AND TOPS SECURE?							
ARE DRUMS MARK AND LABELED PROPERLY? (HAZARDOUS, CLASS)							
ARE DRUMS IN GOOD CONDITION? (NO LEAKS, BULGES, DENTS OR RUSTED)							
IS ISLE SPACE SUFFICIENT?							
IS ALL WASTE ACCUMULATED IN D.O.T. APPROVED CONTAINERS?							
IS WASTE PENDING LAB RESULTS CLEARLY MARK?							
ARE FLAMMABLE DRUMS GROUNDED?							
HAVE ALL DRUMS BEEN STORED FOR LESS THAN 90 DAYS?(LQG)							
IS FIRE EXTINGUISHER AVAILABLE?							
IS GENERAL HOUSE KEEPING IN ORDER?							
QTY of Drums	QTY of Drums	QTY of Drums Sent to				Week Ending	
DESCRIPTION OF OBSERVED CONDITION AND/OR ACTIONS TAKEN:							

TABLE 5
PORT WEST PROPERTIES SITE COMPLEX
Hazardous Waste Inspection Checklist
(Continued)

FPL

Page 1 of

Aboveground Storage Tank Leak Detection Inspections (Chapter 62-762, FAC)
Regulatory Driven to be Inspected within 35 days

Facility: Regulated Materials Facility

FDEP Facility ID 8623251
Inspector: _____
Date: _____

Site Contact: Jeff Wade 561-640-2515

Tank #	Size	Leak Detect/Monitor	Tank Construction	Piping Construction
13	10,000	Interstitial space monitor	Concrete vaulted, DW, steel tank	Galvanized Steel Piping

Manual Stick Readings	Inches of Contents:			Comments: **N/A**
	Inches of Water:			
Electronic Tank Readings	**Inches of Contents:**			Comments:
	Inches of Water:			
Monitor Pad for Cracks, Damages	Ok		Problem	Comments:
Monitor Tank for Cracks, Leaks, Rust	Ok		Problem	Comments:
Monitor Piping for Cracks, Leaks, Rust	Ok		Problem	Comments:
Manual Interstitial Monitoring	Yes		No	Comments:
Electronic Interstitial Monitoring (circle one)	Ok		Alarm	Comments: **N/A**
Interstitial Piping Monitoring	Ok		Problem	Comments: **N/A**
Electronic Overfill Alarm	Ok		Problem	Comments:
Overspill Protection Visual Inspect (circle one)	Dry	Wet	Clean	Physical damage observed: Y/N Explain:
Electronic Piping Sump Monitoring (circle one)	Ok		Alarm	Comments: **N/A**
Piping Sumps Visual Inspection (circle all that apply)	Dry	Fuel	Water	Physical damage observed: Y/N Explain: **N/A**
Dispenser Liners Visual Inspection (circle one)	Dry	Fuel	Alarm	Physical damage observed: Y/N Explain: **N/A**
Placard Displayed State/County	Yes	Yes	No No	Comments:
Proof of Insurance	Yes		No	Comments: **Located in RMF Operations office**
Release Detection Response Plan	Yes		No	Comments: **Performed Visual Inspection**
Remarks:				

Signed:
_____

TABLE 5
PORT WEST PROPERTIES SITE COMPLEX
Hazardous Waste Inspection Checklist
(Continued)

RMF Monthly PCB Drum Storage for Disposal Area Inspection.

Facility Name: _____

Facility Address: _____

Date of Inspection: _____ Inspector's Signature: _____

Storage and Handling of PCB's	YES	NO
Does the storage area have adequate roofing and walls to prevent rainwater from entering?		
Is the storage area free of any drain valves, floor drains, expansion joints, sewer lines or other openings that would allow the escape of liquids from the curbed area?		
Is there adequate secondary containment?		
Is the storage area labeled, signs posted?		
Area containers DOT approved and compatible with the PCB waste?		
Are containers damaged or leaking?		
Are all containers closed?		
Have all PCB articles been checked for leak at least once in the past 30 days?		
Is all equipment marked with "OUT SERVICE DATE" (OSD)?		
Has all equipment older than 9 months from O.S.D. date been shipped for disposal?		
Are all drums in storage properly labeled and dated?		

PROFILE #	OUT SERVICE DATE	I.D. NUMBER	Waste Weight

TABLE 5
PORT WEST PROPERTIES SITE COMPLEX
Hazardous Waste Inspection Checklist
(Continued)

RMF BATTERY STORAGE AREA WEEKLY INSPECTION LOG.

DATE: _____

INSPECTOR: _____

TIME OF INSPECTION: _____ AM _____ PM

INSPECTION OF BATTERY STORAGE FOR RECYCLE AREA	YES	NO	QTY OF PALLETS	QTY OF PALLETS ADDED	QTY OF PALLETS SENT FOR REUSE	WEEK ENDING BALANCE
LEAKING BATTERIES?						
BATTERIES/PALLETS/ RACKS CONDITION ACCEPTABLE?						
PROPER MARKINGS (Weight) AND LABELS						

DESCRIPTION OF OBSERVED CONDITION AND/OR ACTIONS TAKEN:

APPENDIX A
FDEP Regulation letter dated 7/13/92 (CESQG Program)

Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406

Lawton Chiles, Governor

Telephone: 407/433-2650
Fax: 407/433-2666

Carol M. Browner, Secretary

JUL 13 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED
JUL 15 1992
ENVIRONMENTAL AFFAIRS

Mr. Keith Drescher
Florida Power & Light
P.O. Box 078768
West Palm Beach, Florida 33407

RE: Proposed recycling and hazardous waste collection program.

Dear Mr. Drescher:

The Department has reviewed Florida Power & Light's (FPL) May 22, 1992 letter proposing a state wide collection and recycling program for FPL's hazardous wastes generated at its 87 service centers. FPL's proposal to collect both recyclable materials and hazardous wastes encompasses the management of wastes from both Conditionally Exempt Small Quantity Generators (CESQG) and Small Quantity Generators (SQG) as defined in Title 40 Code of Federal Regulations (CFR) 261.5 and 40 CFR 262.34, respectively. The wastes generated from CESQG and SQG are regulated under two separate sets of management requirements. In terms of the wastes generated at CESQG locations, the following requirements will apply to the management of those wastes.

1) Service Centers designated as CESQG must meet the requirements set forth in 40 CFR 261.5 (i.e. generate <100kg of hazardous waste per month and never accumulate >1000kg on-site at any one time).

2) Pursuant to 40 CFR 261.5(g)(3)(v)(A), hazardous wastes generated from CESQG that are beneficially used or reused, or legitimately recycled or reclaimed are not subject to the regulation under 40 CFR, Parts 262 through 266 and 268 and the notification requirement of Section 3010 of RCRA. This exemption would appear to apply to the waste spray paint cans and the fluorescent light tubes if managed in accordance with FPL's recycling proposal.

3) The non-acute hazardous wastes that are generated at CESQG locations and are not going to be beneficially reused, recycled or reclaimed are subject to the requirements of 40 CFR 261.5(g). The Central Reclamation Salvage (CRS) facility in West Palm Beach will be considered a staging

area prior to delivery of the wastes to a facility that meets the requirement of 40 CFR 261.5(g)(3). All hazardous waste accepted by the CRS facility from the CESQG facilities, regardless of volume, will have a maximum of 180 days from the time that they accept the waste to have it removed to a properly permitted TSD facility. If the CRS facility accumulatively accepts and/or generates >100kg of hazardous waste in any on month period or accumulates >1000kg of hazardous waste on-site at any time, it will become a SQG and shall meet the requirements set forth in 40 CFR 262.34. If the CRS facility accumulatively accepts and/or generates >1000kg of hazardous waste in any one month period or accumulates >6000kg of hazardous waste on-site at any time, the facility will be considered a Large Quantity Generator (LQG) and shall meet the full requirements set forth in 40 CFR 262.

4) Although this proposed management plan for CESQG wastes does not require the use of a hazardous waste manifest, the generator of the waste is required to ensure delivery to proper facility. In order for FPL to verify this requirement, the generating facility shall maintain a tracking system that will verify the volume of waste generated, waste type and the date which the wastes are taken off-site. The designated facility shall maintain records that indicate the locations from which the wastes are received, volumes received and the date they are received. All records shall be kept up to date, readily available for review and shall be maintained on-site for at least three years.

5) The hazardous waste generated at CESQG facilities shall not be mixed or combined with any hazardous waste generated at SQG facilities. If the hazardous wastes streams are combined at any time, the resultant mixture shall be managed in accordance with the requirements of SQG wastes as referenced in 40 CFR 262.

The hazardous wastes generated by SQG facilities are subject to the regulations as set forth in 40 CFR 262.34. The following requirements will apply to the management of those wastes.

1) Pursuant to 40 CFR 262.34, all hazardous wastes generated by SQGs that are transported, or offered for transportation, to an off-site treatment, storage or disposal (TSD) facility must utilize a hazardous waste manifest, unless the waste is reclaimed pursuant to a contractual agreement as set forth in 40 CFR 262.20(e). Furthermore, all hazardous wastes that are taken off-site to be recycled are subject to 40 CFR 261.6 requirements. As set forth in 40 CFR 261.6(c),

facilities that recycle recyclable materials without storing the materials before they are recycled are subject to only notification and manifesting requirements. The Department has determined that "storage" of hazardous wastes that are destined for recycling will occur if the wastes are not manifested off-site to a proper TSD or entered into the recycling operation within 24 hours upon arrival at the facility. If the wastes are "stored" on-site for greater than the allowed 24 hour period, all applicable provisions of Parts 264 and 265, and Parts 124, 266, 268 and 270 and the notification requirements of 3010 RCRA will apply to the facility.

2) The CRS will be the designated facility on the hazardous waste manifest for the recyclable materials. If the CRS facility accumulatively accepts and/or generates >100kg of hazardous waste in any on month period or accumulates >1000kg of hazardous waste on-site at any time, it will become a SQG and shall meet the requirements set forth in 40 CFR 262.34. If the CRS facility accumulatively accepts and/or generates >1000kg of hazardous waste in any one month period or accumulates >6000kg of hazardous waste on-site at any time, the facility will be considered a LQG and shall meet the full requirements set forth in 40 CFR 262. The CRS facility must also notify the State via EPA Form 8700-12 with its generator status and as an exempt treater.

3) Any hazardous wastes that are not intended to be reused, recycled or reclaimed at the CRS facility can not be transported from any SQG facility to the CRS facility unless the CRS facility obtains a RCRA storage permit.

The following general conditions shall also apply to the proposal.

1) All staff involved in handling and transferring hazardous waste must be properly trained in site specific emergency and waste handling procedures.

2) The CRS location that accepts the hazardous wastes from the CESQG and SQG shall assume all responsibilities for that waste.

3) This proposal applies only to those wastes streams that are generated at FPL's own facilities. The conditions of this letter do not apply to wastes generated by generators other than FPL's own facilities.

If you have any questions concerning this matter please contact Mr. Jeffrey Smith at 407/433-2650.

Sincerely,

Vivek Kamath

Vivek Kamath, P.E.
Waste Programs Administrator

cc: Satish Kastury, Environmental Administrator, Tallahassee
Thomas Moody, Program Administrator, Pensacola
Michael Fitzsimmons, Program Administrator, Jacksonville
William Bostwick Jr., Program Administrator, Orlando
William Kutash, Program Administrator, Tampa
Vivek Kamath, Program Administrator, West Palm Beach
Philip Barbaccia, Program Administrator, Ft. Myers

APPENDIX B
Rag and Sorbent Management Guidelines (Used rag(s) memo)

RAG AND SORBENT MANAGEMENT GUIDELINES

Overview:

Rags and sorbents may become contaminated with a variety of materials, both hazardous and non-hazardous during daily activities at FPL facilities. Depending upon the type of contamination, different waste management strategies will be required, considering the applicable regulatory requirements, good environmental/OSHA management practices and cost-effectiveness. These strategies can be summarized as: (1) Management as non-hazardous waste; (2) Management as used oil; and (3) Management as hazardous waste.

Rags and sorbents requiring disposal at FPL facilities can generally be expected to become contaminated in one of five ways: (1) Miscellaneous soiling from dirt and other debris for which the soiling source is not readily identifiable (although the soiling is believe to be non-hazardous based upon "process knowledge"; (2) Contaminated with petroleum products such as oil/grease; (3) Contaminated with "listed" hazardous wastes; (4) Contaminated with substances which would be listed hazardous wastes upon being declared a waste; and (5) Contaminated such that there is a likelihood that the rags/sorbents would fail a TCLP hazardous waste characteristic test.

Listed below are specific recommended rag/sorbent management strategies.

Rags/sorbents contaminated with <u>known</u> non-hazardous waste (other than petroleum products) can be disposed of in the regular trash.

> Applies if rags/sorbents become simply "dirty" and the user can apply "process knowledge" (i.e., source and type of contaminants) such that these materials are known to be non-hazardous. Process knowledge determinations should be based upon analytical data, established work practices, product information, etc. and should be documented.

Rags/sorbents contaminated with used oil or oil products (including lubricants and greases) can be disposed of in the regular trash <u>if</u> the oils have been removed <u>and</u> a waste determination shows the rags or sorbents to be non-hazardous.

> Applies if the rags/sorbents have no remaining free-flowing or liquid oil. It is recommended that liquid oil be removed to the extent that the rag or sorbent does not retain any discernible oily residue by touch. The removed oil must be managed as used oil under 40 CFR 279.

Rags/sorbents contaminated with free-flowing or liquid used oil or oil products must be managed as used oil in accordance with 40 CFR 279.

> Practically speaking, to simplify the possible management options, there should be no distinction between materials contaminated with used oil and those contaminated with oil products.

Rags/sorbents contaminated with listed hazardous wastes or products which would be so listed upon becoming a waste should be disposed of as a hazardous waste.

> The "mixture" rule essentially makes these materials listed hazardous wastes.

Rags/sorbents contaminated with products which exhibit hazardous characteristics (e.g., ignitability or toxicity per a TCLP analysis), including those materials which otherwise fail a waste determination (e.g., one performed on materials contaminated with used oil or waste oil), should be disposed of as a hazardous waste.

Rags/sorbents contaminated with products which exhibit hazardous characteristics might test as non-hazardous if subjected to a TCLP analysis and could be disposed of accordingly. The recommended approach treats all such materials as hazardous waste and is an attempt to simplify management options.

PREPARATION AND SHIPPING OF REGULATED MATERIALS / WASTE

Materials that are either not labeled or improperly labeled are being received at the Regulated Materials Facility.

Due to Federal "DOT" Regulations that became effective in October 1, 1993, this "unidentified material" potentially exposes FPL to violations and/or fines from Federal State and Local agencies. These regulations, HM - 181 and HM - 126, mandate training of all personnel who package, handle or load hazardous material, and also define standards for labeling hazardous materials during shipment.

The mandated training has occurred for all Power Delivery, PDC, and Inventory Services Storeroom Supervisors and employees. Work practices for material handling and shipping are continually revised to ensure compliance with the new labeling and shipping regulations.

Work Practices Revision:

- The time to label a drum or closed container is when you first put something in it. Fines and/or penalties may be issued if a Regulatory Agency finds the drum/container unlabeled. The potential fine is $1,000 for each unlabeled or mislabeled drum or container. Doing it right makes good business sense.

- Remove or paint over any old labels on drums/containers that are reused for different material.

- Verify that there is an identifying label for **ALL** drums and closed containers shipped from the field to r RMF or CRS. This label will enable the “ship to” site to maintain a material log, showing the name of the shipped material, when it was received on site, and the “ship from” location. The log is a Federal requirement for all “Conditionally Exempt Small Quantity Generators”.

    - A record or file copy of the shipping papers (Bill of Lading) must be maintained by both the generating site and the receiving site and be readily available for review by Regulatory Agencies. Record copies must be maintained on site for three years.

- **The label will contain information as follows (See Attachment A):**
    - Ship to Location.
    - Ship from Location (four (4) digit storeroom code) or mailing code.
    - Ship Date
    - Type of material being shipped (aerosol cans, paint related material, lead acid batteries, lithium/ni-cad batteries, SF-6 Gas oily dirt, oily rags, vapor bulbs, etc.)

- Instruct all locations on the required labels and shipping methods (See Appendix C).

- Supply necessary shipping labels and manifest forms (shipping papers) to all locations by having these items available through the area Environmental Coordinators (AEC’s).

    - Work with the PDC Transportation Coordinator to ensure that Transportation drivers only pick up and transport materials that have the appropriate labels and to ensure that placards are displayed when required by DOT.

APPENDIX C
Regulated Material, Including FPL Shipping Paper

Florida Power and Light Company
Shipping Paper

FPL

After completing, photocopy and retain for 3 full years

TO: Designated Facility Name and Address:

FROM: (Shipper) Facility Name and Address:

CARRIER: (Transporter) Carrier's Name:

HAZARDOUS MATERIALS SECTION (ALL DRUMS MUST BE TORQUED CLOSED)

No. of Containers/Pallets	Type of Container (circle item)	HM	ID Number	Proper DOT Shipping Description	Hazard Class	Packing Group	Weight of Containers/Pallets	Units	Shipping Decal Required	Emerg. Response Guide No.
	DRUM	X	UN1954	COMPRESSED GASES, FLAMMABLE, N.O.S. (PROPANE, AEROSOLS)	2.1			lbs	Decal # 1	115
	DRUM	X	UN1956	COMPRESSED GASES, N.O.S. (CO2, O2, CO)	2.2			lbs	Decal # 2	126
	DRUM *or* PALLET	X	UN2794	BATTERIES, WET, FILLED WITH ACID	8	III		lbs	Decal # 3	154
	DRUM	X	UN1263	PAINT RELATED MATERIAL	3	II		lbs	Decal # 7	128
	DRUM**	X	UN2315	RQ, PCB, LIQUID	9	III		kg	Decal # 11	171
	DRUM *or* ROLL-OFF**	X	UN3432	RQ, PCB, SOLID, MIXTURE	9	III		kg	Decal # 17	171
	CYLINDER	X	UN1080	SULFUR HEXAFLOURIDE (SF6)	2.2			lbs	Decal # 9	126
	DRUM	X	NA2212	ASBESTOS	9	III		lbs	Decal #10	171
		X								
		X								

** = There must be 1 lb or more of PCB's in the container (e.g., drum, roll-off) to use this shipping name. If not, select a shipping name in the Recyclable Materials Section below.

TOTAL WEIGHT = (If more than 1,000 lbs. see placard instruction below)

RECYCLABLE MATERIALS SECTION (NON-DOT REGULATED MATERIAL)

No. of Containers/Pallets	Non-DOT Regulated Shipping Description	Weight of Containers/Pallets	Units	Shipping Decal or ISL Required on Package
	SPENT MERCURY-CONTAINING LAMPS FOR RECYCLING		lb	Decal # 6
	SPENT MERCURY-CONTAINING DEVICES FOR RECYCLING (< 1 lb of mercury in the devices)		lb	Decal # 5
	SPENT LIGHTING BALLASTS (< 50 ppm of PCB's in the package) (Non-Dot Regulated)		lb	Decal # 12
	SPENT LIGHTING BALLASTS (>= 50 ppm of PCB's and < 1 lb of PCB's in the package)(Non-Dot Regulated)		lb	Decal #8 & # 12
	BROKEN SPENT MERCURY-CONTAINING LAMPS FOR RECYCLING		lb	Decal # 15
	NON-SPILLABLE BATTERIES (Non-Dot Regulated)		lb	Decal #16
	BATTERIES, DRY (Used Small Rechargeable Batteries For Recycling)		lb	Decal #4
	OILY DEBRIS < 50 ppm PCB's (Non-Dot Regulated)		lb	Decal # 12
	PCB CONTAMINATED LIQUID > = 50 ppm PCB's and <1 lb of PCB's in the container (Non-Dot Regulated)		gl	Decal # 8 & #12
	SPENT CAPACITORS, & ELEC MOTORS (>= 50ppm of PCB's and < 1lb of PCB's in the drum) (Non-DOT Regulated)		lb	Decal # 8 & # 12
	OILY DEBRIS > = 50 ppm PCB's and <1 lb of PCB's in the container (Non-Dot Regulated)		lb	Decal # 8 & # 12
			lb	
			lb	
			lb	

SHIPPING PAPER AND PACKAGING INSTRUCTIONS:

= These BOLD OUTLINED columns must be filled in by the Shipper. The Shipper is responsible for: (1) filling in the correct number of containers being shipped, (2) circling the type of container being used for shipment (if applicable), and (3) the total weight of the number of containers entered in the first column. Also see "Shipper's Name" below.

Decals: The Decal specified in the "Shipping Decal Required" column on this shipper paper includes the DOT marking and label, and it must be placed on the outside of each container/pallet. NOTE: If an "ISL" is indicated to use, the exact wording shown in the "Shipping Description" column MUST be written on the ISL. Place ISL on the container.

Placards: If the total weight of all the hazardous materials entered in the "Hazardous Material Section" on this shipping paper exceeds 1,000 lbs, the vehicle must be placarded, and the driver MUST have a hazardous materials endorsement on his/her CDL license.

Shipping Paper: Place 2 copies (separate packing slip envelopes) of the completed Shipping Paper on the container: 1.) copy for Driver 2.) copy for destination

Shipper's Name: The Shipper must PRINT and SIGN his/her name, and write the DATE, on this shipping paper in the "Shipper's Certification" section below.

24-HOUR EMERGENCY CONTACT NUMBER: CHEMTREC 1-800-424-9300

Customer Number "CN 8621"

SHIPPER'S CERTIFICATION: This is to certify that the above-named materials (in the Hazardous Materials Section) are properly classified, described, packaged, marked, labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Print Name (clearly): Sign Name: Date:

Note: To order more decals, go to INFPL, Corporate Services, Integrated Supply Chain, Forms then Sign & Engraving.

APPENDIX C
Regulated Material, Including FPL Shipping Paper

ENVIRONMENTAL CONTACTS					
Contact	Mail Code	Office	Nextel/Pager	Cell	Fax
Leon, Joe	ENV/DY5	(386) 676-7940		386-676-7940	(386) 947-6172
Brutto, Carmine	MBT/MBT	(305) 938-1901		305-608-7188	(305) 228-5295
Andrew Daugherty	ENV/HO	(954)-926-1739		(954)-410-0124	
Pamela Shoosmith	ENV/AOW	(941) 316-6231		(941) 256-6323	
Jeff Wade	ENV/WP8	(561) 681-3135		(954) 599-0317	(561) 640-2332
Porfiro Cevallos	ENV/PDC	(561) 845-4973		(561) 662-7536	(561) 845-3341
Jack Alexander	ENV/DY5	(386) 676-7941		(386) 547-8070	(386) 947-6172
Tomey Tuttle	JES/JB	(561) 691-7050		(561)-762-6278	(561) 691-7049

CORPORATE RECYCLING & SERVICES (CRS-073) CONTACTS					
Contact	Mail Code	Office	Nextel/Pager	Cell	Fax
Barry Street	IRO/PDC	(561) 845-3371	(305) 485-6091 Business Phone 2	(561) 718-2272	
Mike Quinlan	CRS/PDC	(561) 845-3358	65447	(561) 718-2370	(561) 845-3385
Bruce Mach	IRO/PDC	(561) 845-4873		(561) 281-7930	
Wayne Houck	CRS/PDC	(561) 845-3386		(561) 718-3102	
Jason Hodson	SES/PDC(SIGN SHOP)	(561) 881-3484	Note: To order more decals, go to http://eweb.fpl.com/bunit/corpservices/isc/procurement/buying_signage.shtml		

60th STREET (SXV-868)					
Contact	Mail Code	Office	Nextel/Pager	Cell	Fax
Tony Woodley	SXV/MSX	(305)-387-6630	9918	(786) 443-9663	

TRANSPORTATION CONTACTS					
Contact	E-Mail	Office	Nextel/Pager	Cell	Fax
Pat Darco	Transportation-Dispatch.SharedMailbox@nexteraenergy.com	(561) 845-3306		(561) 352-5974	(561) 845-3369
Christ Brundrett	PDC/PCD	(561)-845-4601		(561)-371-6748	

Revised October, 2018

LEGEND:

AEC = AREA ENVIRONMENTAL COORDINATOR
DOT = DEPARTMENT OF TRANSPORTATION
ERC = EQUIPMENT REPAIR CENTER (aka 60TH STREET STORES LOCATION)
INV SVC = ISC INVENTORY SERVICES
ISL = INTERNAL SHIPPING LABEL (white blank label)
IR = INVESTMENT RECOVERY
LF = LANDFILL
NIS = NOT IN STORES
PWP = PORT WEST PROPERTIES (i.e., PDC Facility)
SOPR = SAFETY OPERATING PLANS AND REQUIREMENTS
STO = STOCK TRANSFER ORDER
UPR = UNSATISFACTORY PERFORMANCE REPORT
TX = TRANSFORMER
071 = PDC (PHYSICAL DISTRIBUTION CENTER) WAREHOUSE
073 = CRS (CORPORATE RECYCLING & SERVICES)
IR/073 = INVESTMENT RECOVERY GROUP AT CRS
732 = RMF (REGULATED MATERIALS FACILITY AT PORT WEST PROPERTIES)
868 = SXV (60th STREET STOREROOM)

GENERAL NOTES:

1) **NO** HAZARDOUS WASTE MARKING 

SHOULD BE DISPLAYED ON ANY CONTAINER FOR MATERIALS BEING TRANSPORTED BY FPL OR A CONTRACT CARRIER TO 082 (RMF).

2) ALL CONTAINERS MUST BE MARKED IN ACCORDANCE WITH THE "**CONTAINER MARKING (ISL / DECAL)**" COLUMN. IF COLUMN IS BLANK, NO MARKING IS REQUIRED.

3) ALL SHIPPING PAPERS MUST BE **RETAINED FOR 3 FULL YEARS** FROM THE SHIPPING DATE AT THE SHIP LOCATION.

4) ANY HAZARDOUS MATERIALS SHIPPED USING DOT DRUMS, ALL LID RING BOLTS AND BUNGS (IF EQUIPPED) **MUST BE PROPERLY TORQUED CLOSED PER MANUFACTURER'S SPECS.**
ALL TORQUE WRENCHES MUST BE CALIBRATED AS REQUIRED BY THE MANUFACTURER, TYPICALLY IT'S EVERY YEAR.
CLOSURE INSTRUCTIONS FOR ALL DOT PACKAGES MUST BE KEPT ON FILE FOR **1-YEAR** FROM DATE OF SHIPMENT.

5) ALL EMPLOYEES WHO SHIP OUT HAZARDOUS MATERIALS (e.g., AEROSOL CANS, ACID-FILLED BATTERIES) **MUST** ATTEND A HAZMAT TRAINING CLASS EVERY 3 YEARS.

6) ALL EMPLOYEES WHO HANDLE OR SHIPS OUT UNIVERSAL WASTES ON-SITE (e.g., FLUORESCENT LAMPS, SMALL RECHARGEABLE BATTERIES) **MUST** ATTEND A UNIVERSAL WASTE TRAINING CLASS.

7) TO PROVIDE ANY SUGGESTIONS, UPDATES, OR CHANGES TO THE GUIDELINES, CONTACT EITHER TOMEY TUTTLE, JES, AT (561) 691-7050, JASON MASSEY, CORPORATE RECYCLING & SERVICES, AT (561) 845-3375, PORFIRO CEVALLOS, REGULATED MATERIALS FACILITY, AT (561) 845-4973 OR MIKE KING, INTEGRATED SUPPLY CHAIN, AT (561) 694-3259.

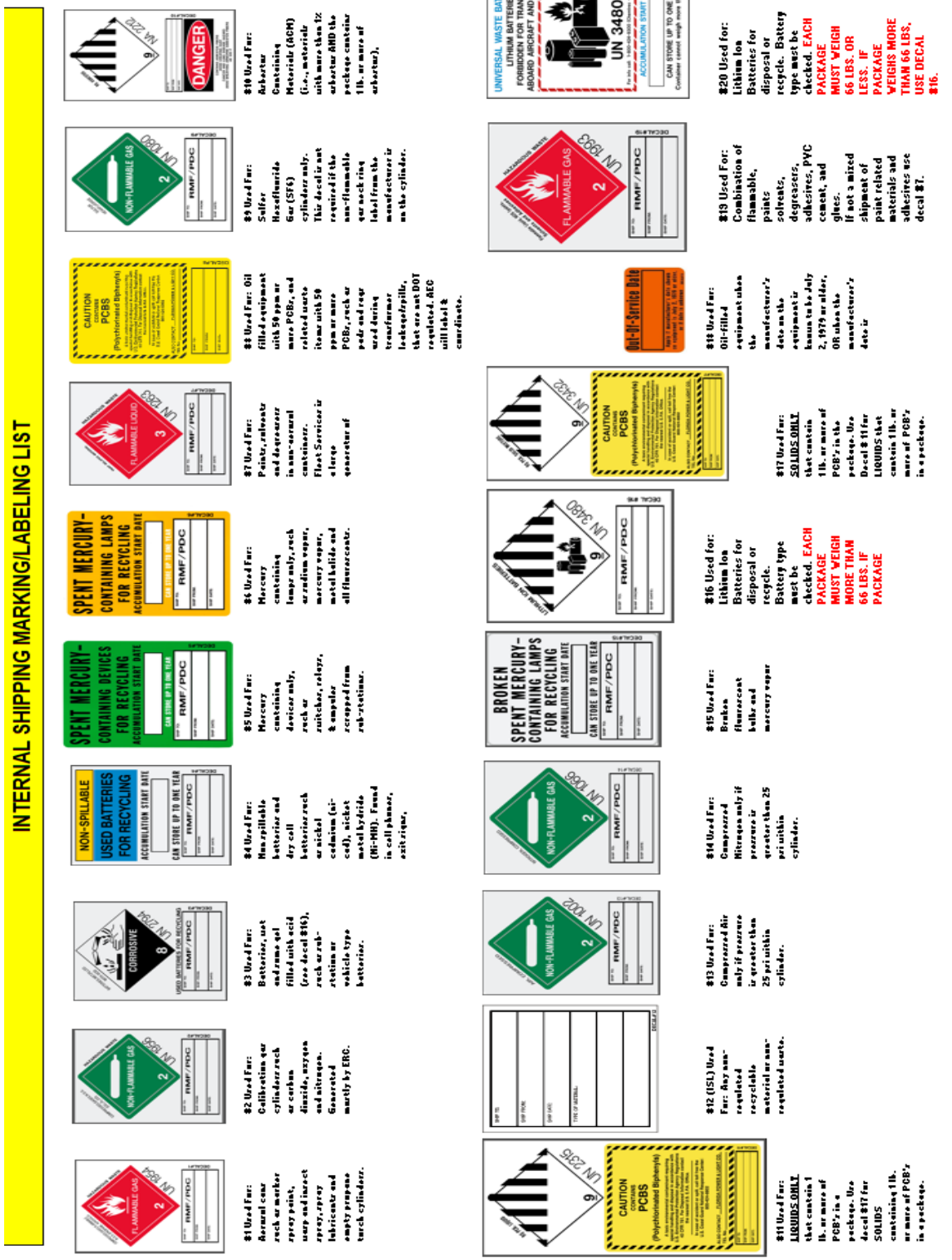
8) TO ORDER DECALS (#1-18): USE THE SIGN & ENGRAVING SHOP'S ON-LINE ORDER FORM BY USING: http://notesapp/Department/ISC/SignsEngraving.nsf/Decal_Poster_Banner?OpenForm

9) FPL GROUP SUBSCRIBES TO THE CHEMTREC SERVICE ON AN ANNUAL BASIS. WHEN THE CHEMTREC EMERGENCY NUMBER IS SUPPLIED ON A HAZARDOUS MATERIALS SHIPPING DOCUMENT, SUCH AS A HAZARDOUS WASTE MANIFEST OR HAZARDOUS MATERIALS BILL OF LADING, THE CUSTOMER NUMBER **(8621)** IS TO PRINTED AFTER THE PHONE NUMBER. IT IS TO BE CLEARLY IDENTIFIED AS THE CUSTOMER NUMBER. IF HAZARDOUS MATERIALS SHIPMENTS ARE MADE WITH ANOTHER EMERGENCY CONTACT NUMBER, THEN THE NAME OF THE CONTACT IS TO BE INCLUDED IN THE SAME POSITION.

APPENDIX C
Regulated Material, Including FPL Shipping Paper

PRODUCT DESCRIPTION	SHIP TO LOCN	CONTAINER MARKING ISL / DECAL	CONTAINER MARKING INFORMATION	USE FPL SHIPPING PAPER?	SHIPPING PAPER INFORMATION Note: commas in shipping names are listed below are pre-printed on the shipping paper. Others may be entered on blank lines	COLLECTION/ SHIPPING CONTAINER	TORQUE DRUM CLOSED?	SHIPPING INSTRUCTIONS
AEROSOL PRODUCTS								
AEROSOL CANS PROPANE CANISTERS (Less than 20 ounces)		DECAL #1	INFORMATION ON DECAL #1	YES	"UN1954, COMPRESSED GASES, FLAMMABLE, N.O.S (PROPANE, AEROSOLS), 2.1,"	DOT DRUM	YES	1) FILL-OUT "FROM" AND "DATE" ON DECAL #1. 2) SMALL PROPANE TORCH CYLINDERS CAN BE SHIPPED WITH AEROSOL CANS. 3) NO ACETYLENE CYLINDERS--CONTACT AEC FOR ASSISTANCE. 4) TORQUE DRUM CLOSED PRIOR TO SHIPPING PER MANUFACTURER'S SPECS. 5) REMOVE OR COVER THE YELLOW HAZARDOUS WASTE MARKING ON DRUMS, IF APPLIED, PRIOR TO SHIPPING.
SEE "EMPTY CYLINDERS" FOR LARGER PROPANE TANKS.	RMF							
CALIBRATION GAS CYLINDERS (small cylinders)		DECAL #2	INFORMATION ON DECAL #2	YES	"UN1956, COMPRESSED GASES, N.O.S. (CO_2, O_2, CO), 2.2,	DOT DRUM	YES	1) FILL-OUT "FROM" AND "DATE" ON DECAL #2. 2) PLACE ANY TYPE OF CALIBRATION GAS CYLINDER IN A SINGLE DRUM 3) TORQUE DRUM CLOSED PRIOR TO SHIPING PER MANUFACTURER'S SPECS. 4) REMOVE OR COVER THE YELLOW HAZARDOUS WASTE MARKING ON DRUMS, IF APPLIED, PRIOR TO SHIPPING.
ALUMINUM PRODUCTS								
ALUMINUM CONDUCTOR								*** NOTE: SOME LOCATIONS ARE SERVICED BY VENDORS AND DO NO**
- SCRAP AL WIRE/CABLE (870-10200-2)								
- LARGE QUANTITY						ROLL OFF		ROLL-OFF CONTAINERS & LRG CAGES AVAILABLE IN SOME AREAS
- SHORT PIECES						LG TUB		CONTACT: MIKE QUINLAN AT 845-3358 FOR LARGE CAGES
- COILS						BANDED		BANDED IN BUNDLES OR BANDED TO PALLET
- SCRAP URD CABLE (870-38500-4)								*** NOTE: SOME LOCATIONS ARE SERVICED BY VENDORS AND DO NO**
LARGE QUANTITY	073					ROLL OFF		ROLL-OFF CONTAINERS & LRG CAGES AVAILABLE IN SOME AREAS
								CONTACT: **MIKE QUINLIN** AT 845-3358 FOR LARGE CAGES
SHORT PIECES						LG TUB		
COILS						BANDED		BANDED IN BUNDLES OR BANDED TO PALLET
ALUMINUM JUNCTION BOX						PALLET		
ALUMINUM MISCELLANEOUS PIECE PARTS						SMTUB		REFER TO "MISC. METAL PARTS" FOR INSTRUCTIONS.
ALUMAWELD								
- CABLE						PALLET		
- PREFORMS						SMTUB		PREFORMS AND GRIPS MAY BE PUT WITH GUY WIRE.
APPLIANCES								
STOVES, REFRIGERATORS, MICROWAVES AND OTHER LARGE UNITS	073/IR					PALLET OR BOX, if applicable		**NOTE: DO NOT EVACUATE OIL OR FREON FROM ANY UNITS. RMF WIL**
SMALL APPLIANCES								INDICATE IF ITEM IS IN WORKING CONDITION
PORTABLE A/C UNITS	RMF					PALLET		
ASBESTOS PRODUCTS								
DISTRIBUTION ARRESTERS-								FOLLOW INSTRUCTIONS IN "ASBESTOS AWARENESS VIDEO (2/03)
ALL PORCELAIN TYPE		DECAL #10	INFORMATION ON DECAL #10	YES	"NA2212, ASBESTOS, 9, III"	DOT DRUM	YES	1) PLACE INTACT ARRESTER IN POLY BAG AND SEAL WITH TY-WRAP
(EXCEPT JOSLYN)								2) CAREFULLY PLACE BAGGED UNIT IN DESIGNATED D.O.T. DRUM
	RMF							3) IF BROKEN UNIT IS DISCOVERED, CONTACT **AEC** IMMEDIATELY BEFORE HANDLING
								4) TORQUE DRUM CLOSED PRIOR TO SHIPING PER MANUFACTURER'S SPECS.
								NOTE: THE ARRESTERS MUST CONTAIN >= 1% OF ASBESTOS TO BE REGULATED BY EPA. IF BROKEN, THE ARRESTERS CONTAINING >= 1% OF ASBESTOS ARE ALSO REGULATED BY DOT.
AUTOMOTIVE PRODUCTS								
MISC. AUTOMOTIVE PARTS						PALLET		BAND SECURELY TO PALLET-FLUSHED OF ALL COOLANT
-ALUM AUTOMOTIVE RADIATORS						TUB		SORT BY METAL TYPE
- NON-OIL/GREASY PARTS	073							
- OIL/GREASY PARTS						3yd HOPPER		SPECIAL BLUE 3 yd. HOPPER WITH AUTOMOTIVE LOGO.

PRODUCT DESCRIPTION	SHIP TO LOCN	CONTAINER MARKING ISL # DECAL	CONTAINER MARKING INFORMATION	USE FPL SHIPPING PAPER?	SHIPPING PAPER INFORMATION note: common shipping names listed below are pre-printed on the shipping paper. Others may be entered on blank line	COLLECTION/ SHIPPING CONTAINER	TORQUE DRUM CLOSED?	SHIPPING INSTRUCTIONS
BATTERIES								
BATTERIES - FILLED WITH LIQUID ACID (IF GEL FILLED, SEE ITEM BELOW)	RMF	DECAL #3	INFORMATION ON DECAL #3	YES	"UN2794, BATTERIES, WET, FILLED WITH ACID, 8, III"	OVERPAK/ PALLET		FILL-OUT "FROM" AND "SHIP DATE" ON DECAL #3. **NOTE:** PERSONAL PROTECTIVE EQUIPMENT MUST BE WORN (I.E., RUBBER GLOVES, FACE SHIELD, RUBBER/PLASTIC APRON) WHEN HANDLING ACID-FILLED BATTERIES. 1) USE A PALLET THAT WILL BE ADEQUATE TO SUPPORT THE WEIGHT OF THE BATTERIES. 2) PLACE A PIECE OF CARDBOARD ON TOP OF AN EMPTY PALLET AND THEN AN OVERSIZED PIECE OF HEAVY PLASTIC (VISQUEEN)T ON TOP OF THE CARDBOARD. 3) PLACE THE BATTTERIES ON THE PALLET INSURING THAT THE BATTERIES DO NOT OVERHANG THE PALLET. 4) TERMINALS **MUST** BE PROTECTED FROM SHORTING BY COVERING WITH NON-CONDUCTIVE CAP, ELECTRICAL, DUCT, OR OTHER SIMULAR TAPE. 5) COVER THE BATTERIES WITH THE OVERSIZED PLASTIC. USE A SECOND SHEET IF NECESSARY. 6) USING A PLASTIC OR PADDED STEEL STRAPPING AND BUCKLES, SECURE THE BATTTERIES TIGHTLY AROUND THE SIDES, TYING ALL THE BATTERIES TOGETHER. 7) STARTING AT THE BOTTOM OF THE PALLET, STREATCH WRAP THE ENTIRE PALLET, OVERLAPPING THE LOWER LAYER ON EACH PASS AROUND THE PALLET. 8) SECURE THE STREACH WRAP IN A MANNER THAT WILL PREVENT IT FROM WORKING OR BLOWING LOOSE DURING TRANSPORT. 9) USING PLASTIC OR STEEL STRAPPING AND BUCKLES, STRAP OVER THE TOP OF THE BATTERIES TO THE PALLET. **DO NOT PLACE STRAPPING OVER THE BATTERY POSTS.** IF STEEL BANDING IS USED INSTALL CARDBOARD OR SIMULAR MATERIAL TO PROTECT ALL EDGES OF BATTERIES THAT COME IN CONTACT WITH BANDING. 10) PLACE DECAL #3 ON THE OUTSIDE OF THE WRAPPING. DECAL #3 NEED ONLY
GEL CELL BATTERIES ARE UNIVERSAL GEL CELL BATTERIES (NON-SPILLABLE ONLY) (**NOTE:** CHECK MSDS TO DETERMINE IF THE BATTERIES MEET THE DOT REQUIREMENT FOR BEING NON-SPILLABLE)		DECAL # 4	INFORMATION ON DECAL # 4 (CLEARLY WRITE ACCUMULATION START	YES	NON-SPILLABLE BATTERIES (Non-DOT Regulated)	BOX, BUCKET, OR DRUM		FILL OUT ACCUMULATION START DATE ON DECAL # 4 WHEN FIRST BATTERY IS PLACED INTO THE CONTAINER. FILL OUT "FROM" AND "SHIP DATE" PRIOR TO SHIPPING. WHILE ACCUMULATING THE NON-SPILLABLE BATTERIES ON-SITE: (1) TERMINALS MUST BE PROTECTED FROM SHORTING BY COVERING WITH ELECTRICAL, DUCT, OR OTHER SIMULAR TAPE. (2) ACCUMULATE IN DURABLE CARDBOARD BOX, PLASTIC BUCKET OR DRUM. (3) KEEP CONTAINERS CLOSED AT ALL TIMES WHILE ACCUMULATING ON-SITE. (4) CAN SHIP CONTAINER ON PALLET, IF DESIRED. (5) KEEP BATTERIES COMPLETELY DRY. (6) BATTERIES MUST BE SHIPPED TO RMF/PDC (RMF) WITHIN ONE YEAR FROM THE ACCUMULATION DATE SHOWN ON DECAL #16 REGARDLESS OF THE AMOUNT ACCUMULATED.
DRY CELL - ALKALINE ONLY (LESS THAN 9 VOLT)	LF					DUMPSTER		DISPOSE OF IN DUMPSTER.
ITEMS BELOW ARE UNIVERSAL WASTES RECHARGEABLE (other than lithium batteries) (FOUND IN RADIOS, CELL PHONES, PORTABLE TOOLS AND COMPUTER COMPONENTS) -NICKEL CADMIUM (Ni-Cd) -NICKEL METAL HYDRIDE (Ni-MH)	RMF	DECAL #4	INFORMATION ON DECAL #4 (CLEARLY WRITE ACCUMULATION START DATE ON DECAL) For Lithium batteries see below	YES	"BATTERIES, DRY (USED SMALL RECHARGEABLE BATTERIES FOR RECYCLING)"	BOX, BUCKET, OR DRUM		FILL OUT ACCUMULATION START DATE ON DECAL #4 WHEN FIRST BATTERY IS PLACED INTO THE CONTAINER. FILL OUT "FROM" AND "SHIP DATE" PRIOR TO SHIPPING. WHILE ACCUMULATING THE BATTERIES ON-SITE: 1) TERMINALS MUST BE PROTECTED FROM SHORTING BY COVERING THE TERMINALS WITH ELECTRICAL TAPE, OR PLACE INDIVIDUAL BATTERY IN PLASTIC ZIPLOC BAG 2) ACCUMULATE IN DURABLE CARDBOARD BOX, PLASTIC BUCKET OR DRUM 3) KEEP CONTAINERS CLOSED AT ALL TIMES WHILE ACCUMULATING ON-SITE 4) CAN SHIP CONTAINER ON PALLET, IF DESIRED 5) KEEP BATTERIES COMPLETELY DRY 6) BATTERIES MUST BE SHIPPED TO RMF WITHIN ONE YEAR FROM ACCUMULATION START DATE SHOWN ON DECAL #4 REGARDLESS OF THE AMOUNT ACCUMULATED. (CO MAIL RMF/ PDC)
-LITHIUM (Li-ion) for Disposal or Recycling, collect separately and ship using the shipping name 'Lithum Batteries for Recycling" on the shipping paper.**(less than 66 lbs per container)**	RMF	Decal # 20	INFORMATION ON DECAL # 20 (CLEARLY WRITE ACCUMULATION START DATE ON DECAL)	YES	LITHIUM BATTERIES (Non-DOT Regulated) (**each package weighs 66 lbs. or less.** If more than 66 lbs, use hazmat section below:)			
LITHIUM (Li-ion) for Disposal or Recycling-**IF LITHIUM BATTERIES WEIGHT MORE THAN 66 LBS**, PLEASE APPLY DECALS #4 and # 16 INSTEAD. AND SELECT LITHIUM BATTERIES CHOICE UNDER THE HAZARDOUS MATERIAL SECTION OF THE SHIPPING PAPERS		Decals # 4 and 16	INFORMATION ON DECAL #4 (CLEARLY WRITE ACCUMULATION START DATE ON DECAL)	YES	UN3480, LITHIUM ION BATTERIES, 9 (**each package weighs more than 66 lbs.**)			NOTE: LITHIUM BATTERIES MUST BE PACKAGED TO PREVENT MOVEMENT DURING TRANSPORT. **DECAL #20 MUST BE ADDED AND MARKED TO INDICATE TYPE OF LITHIUM BATTERY FOR SHIPMENT. PACKAGE WEIGHT IS LIMITED TO 66 POUNDS OR LESS.** THE WEIGHT LIMIT DOES NOT APPLY TO BATTERIES SHIPPED IN EQUIPMENT. IF LITHIUM BATTERIES **WEIGHT MORE THAN 66 LBS, PLEASE APPLY DECALS #4 and # 16 INSTEAD.** AND SELECT LITHIUM BATTERIES CHOICE UNDER THE HAZARDOUS MATERIAL SECTION OF THE SHIPPING PAPERS.
(FOR CPU'S, MONITORS AND OTHER ELECTRONICS								


INTERNAL SHIPPING MARKING/LABELING LIST
#1 Used For: Aerosol cans, rock or marker spray paint, spray adhesive, spray lubricant and empty propane torch cylinder.
#2 Used For: Calibration gas cylinders, rock or carbon dioxide, oxygen and nitrogen. Generated mainly by ERG.
#3 Used For: Batteries, wet and semi-wet filled with acid (see decal #16), rock or retention or vehicle type batteries.
#4 Used For: Non-spillable batteries and dry cell batteries, rock or nickel cadmium (ni-cad), nickel metal hydride (Ni-MH). Found in cell phones, exit signs.
#5 Used For: Mercury containing devices, rock or switches, relays, & sampler scrapped from sub-stations.
#6 Used For: Mercury containing lamps only, rock or sodium vapor, mercury vapor, metal halide and all fluorescent.
#7 Used For: Paints, solvents and degreasers in non-aerosol containers. Fleet Services is a large generator of
#8 Used For: Oil filled equipment with 50 ppm or more PCBs, and related waste items with 50 ppm or more PCBs, rock or pads and rags used during transformer leakage/spills, that are not DOT regulated. AEG will label & coordinate.
#9 Used For: Sulfur Hexafluoride Gas (SF6) cylinder only. This decal is not required if the non-flammable gas neck ring label from the manufacturer is on the cylinder.
#10 Used For: Asbestos Containing Materials (ACM) (i.e., materials with more than 1% asbestos AND the package containing 1 lb. or more of asbestos).
#11 Used For: LIQUIDS ONLY that contain 1 lb. or more of PCB's in a package. Use decal #17 for SOLIDS containing 1 lb. or more of PCB's in a package.
#12 (ISL) Used For: Any non-regulated recyclable material or non-regulated waste.
#13 Used For: Compressed Air only if pressure is greater than 25 psi within cylinder.
#14 Used For: Compressed Nitrogen only if pressure is greater than 25 psi within cylinder.
#15 Used For: Broken fluorescent bulbs and mercury vapor
#16 Used for: Lithium Ion Batteries for disposal or recycle. Battery type must be checked. EACH PACKAGE MUST WEIGH MORE THAN 66 LBS. IF PACKAGE
#17 Used For: SOLIDS ONLY that contain 1 lb. or more of PCB's in the package. Use Decal # 11 for LIQUIDS that contain 1 lb. or more of PCB's in a package.
#18 Used For: Oil-filled equipment when the manufacturer's date on the equipment is known to be July 2, 1979 or older, OR when the manufacturer's date is
#19 Used For: Combination of flammable, paints solvents, degreasers, adhesives, PVC cement, and glues. If not a mixed shipment of paint related materials and adhesives use decal #7.
#20 Used for: Lithium Ion Batteries for disposal or recycle. Battery type must be checked. EACH PACKAGE MUST WEIGH 66 LBS. OR LESS. IF PACKAGE WEIGHS MORE THAN 66 LBS, USE DECAL #16.
FPL

APPENDIX D
Antifreeze Filters

FPL

Inter-Office Correspondence

TO: David Barichivich

FROM: Keith D. Drescher

DATE: November 30, 1994

LOCATION: JEN-GB

SUBJECT: **Antifreeze Recycling Filters- Non-hazardous Waste**

COPIES TO: Ken Simmons
Alan Benedict

Please find attached four quarters of analyses of antifreeze recycling machine filters from two of our automotive garages. The results are significantly below the TCLP limits for metals in all cases and thus reinforces our knowledge that the filters from the company standard antifreeze recycling machine (Goodall Model 54-135) are not hazardous wastes.

The sampling and analysis was based on my recommendation in a July 9, 1993 memo and the samples were taken both at the AEC and at Stuart Automotive from the Goodall antifreeze recycling machine. Samples of the filters were taken after their normal use cycle so they were demonstrative of any entrained metals in the antifreeze. Because the company recycles all automotive antifreeze, these filters will be the only waste material from antifreeze usage.

Based on our knowledge and the analyses, these filters can, after use for filtering antifreeze, be legitimately disposed of as a normal municipal solid waste (put them in the dumpster!). Please assure that excess antifreeze is drained from the filter prior to disposal and we do not have to count the filters in the monthly hazardous waste generation from all of our facilities that use the Goodall machine.

APPENDIX E

Regulated Materials Daily Inspection Logs and Procedures

DATE :		**TIME OF INSPECTION:**					
INSPECTOR:							

STORAGE FOR DISPOSAL AREA- INSPECTION ITEMS	**YES**	**NO**
ARE DRUMS BUNGS AND TOPS SECURE?		
ARE DRUMS MARK AND LABELED PROPERLY? (HAZ. CLASS, ACCUMULATION START DATE)		
ARE DRUMS IN GOOD CONDITION? (NO LEAKS, BULGES, DENTS OR RUSTED)		
IS ISLE SPACE SUFFICIENT?		
IS ALL WASTE ACCUMULATED IN D.O.T. APPROVED CONTAINERS?		
IS WASTE PENDING LAB RESULTS CLEARLY MARK?		
ARE FLAMMABLE DRUMS GROUNDED?		
HAVE ALL DRUMS BEEN STORED FOR LESS THAN 90 DAYS?(LQG)		
IS FIRE EXTINGUISHER AVAILABLE?		
IS GENERAL HOUSE KEEPING IN ORDER?		

QTY of Drums Carried Over from previous week	**QTY of Drums Added**	**QTY of Drums Sent for disposal.**	**Current Week Ending Balance**

HAZARDOUS WASTE SATELLITE ACCUMULATION AREA- INSPECTION ITEMS	**YES**	**NO**
ARE DRUMS BUNGS AND TOPS SECURE?		
ARE DRUMS MARK AND LABELED PROPERLY? (HAZ. CLASS, ACCUMULATION START DATE)		
ARE DRUMS IN GOOD CONDITION? (NO LEAKS, BULGES, DENTS OR RUSTED)		
IS ISLE SPACE SUFFICIENT?		
IS ALL WASTE ACCUMULATED IN D.O.T. APPROVED CONTAINERS?		
IS WASTE PENDING LAB RESULTS CLEARLY MARK?		
ARE FLAMMABLE DRUMS GROUNDED?		
HAVE ALL DRUMS BEEN STORED FOR LESS THAN 90 DAYS?(LQG)		
IS FIRE EXTINGUISHER AVAILABLE?		
IS GENERAL HOUSE KEEPING IN ORDER?		

QTY of Drums Carried	**QTY of Drums**	**QTY of Drums Sent**	**Current Week**

DESCRIPTION OF OBSERVED CONDITION AND/OR ACTIONS TAKEN:

APPENDIX E
Regulated Materials Daily Inspection Logs and Procedures
(Continued)

Facility Name: _____

Facility Address: _____

Date of Inspection: _____ Inspector's Signature: _____

Storage and Handling of PCB's	YES	NO
Does the storage area have adequate roofing and walls to prevent rainwater from entering?		
Is the storage area free of any drain valves, floor drains, expansion joints, sewer lines or other openings that would allow the escape of liquids from the curbed area?		
Is there adequate secondary containment?		
Is the storage area labeled, signs posted?		
Area containers DOT approved and compatible with the PCB waste?		
Are containers damaged or leaking?		
Are all containers closed?		
Have all PCB articles been checked for leak at least once in the past 30 days?		
Is all equipment marked with " OUT SERVICE DATE" (OSD)?		
Has all equipment older than 9 months from O.S.D. date been shipped for disposal?		
Are all drums in storage properly labeled and dated?		

PROFILE #	OUT SERVICE DATE	I.D. NUMBER	Waste Weight

FPL - STORAGE TANK AND PIPING INSPECTION RECORD

MONTHLY INSPECTION (not to exceed 35 days) DATE:							
INSPECTION ITEMS LEGEND: Y = YES, N = NO	TANK #	TANK #	TANK #	TANK #	TANK #	TANK #	TANK #
• *PIPING COMPONENTS*							
Is the piping & components (valves, pumps, flanges, etc.) free of leaks, ruptures, or corrosion?							
Is the piping properly aligned and are supports/foundations and piping in good condition?							
• *SECONDARY CONTAINMENT SYSTEM*							
Is the secondary containment system in good condition & free of oil or sheen & excessive rainwater?							
For double bottom or double-walled tanks, is the interstitial space free of product?							
• *STORAGE TANK COMPONENTS*							
Are the level controls, alarms, and in-line equipment operating properly?							
Is the tank free of leaks, shell distortions, corrosion, cracks, wetting, discoloration, blistering or signs of settlement?							
Is the tank exterior coating (paint) in good condition?							
Is the tank foundation/supports in good condition?							

Comments: _____

_____

SIGNATURE OF INSPECTOR: SIGNATURE OF SUPERVISOR:

STORAGE TANK CONTAINMENT DRAINAGE INSPECTION RECORD

WEEKLY INSPECTION RECORD							
CONTAINMENT AREA or RETENTION POND	DATE :	TIME	OIL SHEEN (YES/NO)	TIME DRAIN VALVE OPENED	TIME DRAIN VALVE CLOSED	INSPECTOR	COMMENTS

APPENDIX E

WEEKLY INSPECTION RECORD

DATE	TIME	COMMENTS	INITIALS

APPENDIX E

DATE :	TIME OF INSPECTION:	
INSPECTOR:		

STORAGE FOR DISPOSAL AREA- INSPECTION ITEMS	YES	NO
ARE DRUMS BUNGS AND TOPS SECURE?		
ARE DRUMS MARK AND LABELED PROPERLY? (HAZ. CLASS, ACCUMULATION START DATE)		
ARE DRUMS IN GOOD CONDITION? (NO LEAKS, BULGES, DENTS OR RUSTED)		
IS ISLE SPACE SUFFICIENT?		
IS ALL WASTE ACCUMULATED IN D.O.T. APPROVED CONTAINERS?		
IS WASTE PENDING LAB RESULTS CLEARLY MARK?		
ARE FLAMMABLE DRUMS GROUNDED?		
HAVE ALL DRUMS BEEN STORED FOR LESS THAN 90 DAYS?(LQG)		
IS FIRE EXTINGUISHER AVAILABLE?		
IS GENERAL HOUSE KEEPING IN ORDER?		

QTY of Drums Carried Over from previous week	QTY of Drums Added	QTY of Drums Sent for disposal.	Current Week Ending Balance

HAZARDOUS WASTE SATELLITE ACCUMULATION AREA- INSPECTION ITEMS	YES	NO
ARE DRUMS BUNGS AND TOPS SECURE?		
ARE DRUMS MARK AND LABELED PROPERLY? (HAZ. CLASS, ACCUMULATION START DATE)		
ARE DRUMS IN GOOD CONDITION? (NO LEAKS, BULGES, DENTS OR RUSTED)		
IS ISLE SPACE SUFFICIENT?		
IS ALL WASTE ACCUMULATED IN D.O.T. APPROVED CONTAINERS?		
IS WASTE PENDING LAB RESULTS CLEARLY MARK?		
ARE FLAMMABLE DRUMS GROUNDED?		
HAVE ALL DRUMS BEEN STORED FOR LESS THAN 90 DAYS?(LQG)		
IS FIRE EXTINGUISHER AVAILABLE?		
IS GENERAL HOUSE KEEPING IN ORDER?		

QTY of Drums Carried	QTY of Drums	QTY of Drums Sent	Current Week

DESCRIPTION OF OBSERVED CONDITION AND/OR ACTIONS TAKEN:

APPENDIX F
Sample Manifest and Waste Profile

Please print or type. MIX 840921 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: FLD000807792 | 2. Page 1 of: 2 | 3. Emergency Response Phone: (877) 818-0087 | 4. Manifest Tracking Number: 001530841 VES

5. Generator's Name and Mailing Address: TONY CEVALLOS
FLORIDA POWER AND LIGHT CO.
2455 PORT WEST BLVD.
WEST PALM BEACH, FL 33407
Generator's Phone: 561 845-4973

Generator's Site Address (if different than mailing address): SAME

6. Transporter 1 Company Name: VEOLIA ES TECHNICAL SOLUTIONS | U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name: FREEHOLD CARTAGE INC | U.S. EPA ID Number: NJD054126164

8. Designated Facility Name and Site Address: VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
HWY 73-3.5 MI W. TAYLORS BAYOU
PORT ARTHUR, TX 77640
Facility's Phone: 409 736-4170 | U.S. EPA ID Number: TXD000838896

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN1950, WASTE AEROSOLS, FLAMMABLE,(EACH NOT EXCEEDING 1L CAPACITY), 2.1, RQ (D001), LIMITED QUANTITY	6	DM	300	K	D001		
							OUTS801H	
X	2. UN1950, WASTE AEROSOLS, FLAMMABLE,(EACH NOT EXCEEDING 1L CAPACITY), 2.1, LIMITED QUANTITY	7	DM	298	K	D001		
							OUTS801H	
X	3. UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, 9, II, RQ	1	DF	36	K	NONE		
							OUTS2061	
X	4. UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, II, RQ (PCB)	1	DM	73	K	NONE		
							OUTS4091	

14. Special Handling Instructions and Additional Information: ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - ER
Service Contracted by VESTS + Contract retained by generator confers agency authority on initial transporter to add or substitute additional transporters on generator's behalf + 1) ERG:126 W:413232 A:VGCPTAVES8005 2) ERG:126 W:413232 A:VGCPTAVES8005 3) ERG:171 W:597146 A:VGCPTAVES8094 4) ERG:171 W:353701 A:VGCPTAVES8082

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Porfirio A Cevallos | Signature: Porfirio A Cevallos | Month 2 | Day 5 | Year 19

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Will Sawyer | Signature | Month 2 | Day 5 | Year 19

Transporter 2 Printed/Typed Name: Christopher Roberts | Signature | Month 2 | Day 6 | Year 19

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) | U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H040	H040	H040	H040

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Tiffany Castleman | Signature: Castleman | Month 2 | Day 13 | Year 19

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. **DESIGNATED FACILITY TO GENERATOR**

APPENDIX F
Sample Manifest and Waste Profile
(Continued)

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

|__| Invoice Address — Veolia ES Location: W MELBOURNE FL OFFICE (OFFICE) — WEST MELBOURNE (CITY) — FL (ST) — |001 | 019 |

Veolia ES TSDF requested _____ Technology requested _____ Generator No. 561033 Generator EPA ID No. FLD000807792

1. Generator Name FLORIDA POWER AND LIGHT CO. Generator State No. _____
   Address 2455 PORT WEST BLVD. State Wastestream No. _____
   City WEST PALM BEACH State FL Country US ZIP 33407 ____
   NAICS(SIC) Code 4911 _____ _____ _____ Source G11 Origin 1 Form W801 System Type _____

---

2. Waste Name AEROSOLS Lab or Waste Area _____
3. Process Generating Waste
   SPENT OUTDATED MATERIAL
4. Shipping Name WASTE AEROSOLS, FLAMMABLE, (EACH NOT EXCEEDING 1L CAPACITY)
   Hazard Class 2.1 UN/NA No. UN1950 PG ___ RQ amt 100 lb Waste: Y PIH: N IH: N DWW: N P: N
   RQ Des: 1. D001 2. _____
   DOT Des: 1. _____ 2. _____
5. Waste Codes D001 _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____
   Wastewater _____ Non Wastewater X Sub Category D001-IG Mix: N Sol: N

---

6. Physical and chemical properties:

pH
a ___ < 2
b ___ 2 - 5
c X 5 - 9
d ___ 9 - 12.5
e ___ > 12.5
____ - ____ exact

Specific Gravity
a X <.8
b ___ .8 - 1.0
c ___ 1.0
d ___ 1.0 - 1.2
e ___ > 1.2
____ - ____ exact

Flash Point(F)
a ___ < 80
b X 80 - 100
c ___ 100 - 140
d ___ 140 - 200
e ___ > 200
f ___ no flash ____ - ____ exact

Solids
0 - 0% suspended
0 - 0% settleable
0 - 0% dissolved
0 - 0 % ash
0 - 0 % water solubility
0 - 0 BTU/lb
Free Liquid 0 - 0 %
VOC 0 - 0 %

Physical State
s ___ solid
m ___ semi-solid
l ___ liquid
p ___ pumpable semi-solid
f ___ flowable powder
g ___ gas
a X aerosol
r ___ pressurized liquid
d ___ debris per 40 CFR 268.45
h ___ sharps
q ___ pumpable liquid

Hazardous Characteristics
a ___ air reactive
w ___ water reactive
c ___ cyanide reactive
f ___ sulfide reactive
e ___ explosive
o ___ oxidizing acid
p ___ peroxide former
r ___ radioactive or NRC regulated
s ___ shock sensitive
t ___ temp sensitive
m ___ polymerization/monomer
n ___ OSHA carcinogen
i ___ infectious
h ___ inhalation hazard
Zone: _

Odor
a none ____
b mild ____
c strong ____
describe _____

Halogens
Br .0 - .0 % Bromine
Cl .0 - .0 % Chlorine
F .0 - .0 % Fluorine
I .0 - .0 % Iodine

Layers: | a ____ multilayered: b ____ bi-layered: c X single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	X low(water)	___ low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

WIP NO. 413232

APPENDIX F
Sample Manifest and Waste Profile
(Continued)

DocuSign Envelope ID: F2FE3BAD-109E-46B8-9FC1-D5FE13EB52F0

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n N HOC < 1000 ppm ___ HOC > 1000 ppm ___

---

7. **Chemical Composition** [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents	Ranges		Units
AEROSOL CANS OUTDATED, NON FUNCTIONAL CANS WITH RESIDUAL, IGNITABLE	100.00	100.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
    If yes:
    Is the wastestream subject to Notification/Control Requirements? Yes __ No X
    Benzene Concentration .00 ppm
    Does it contain >= 10% water? Yes __ No X
    What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes X No __
    Volatile Organic Concentration 501.00 ppmw
    CC Approved Analytical Method? Yes __ No X
    Generator Knowledge? Yes X No __
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. **Container Information** :

Packaging: 55IA2 Type/Size: DM 55 GAL OPEN HEAD (17H) DM
_____ Type/Size: __

Shipping Frequency: Units 115.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year X One Time _
UOM DRUMS DESCRIPTION: _____

15. **Additional Information** :

16. **Product Reclaim**

Does Generator want material back (TOLL)? Yes _ No _
If Yes, what is the Generator's product specification?

Constituents	Range	Units

APHA Color ___ Other _____
Is the waste: grain _ or synthetic _ Ethanol? SDA Formula No._____
Have TTB taxes been paid on the contained ethanol and eligible for rebate? ___
Transportation Provided By: _ Veolia _ Generator _ Other
Returned in: _ Bulk (_ T/T _ T/C _ ISO) _ Drums _ Other

WIP NO. 413232

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Describe the application for the solvent:

Additional Information:

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

Tony Cevallos	561-845-4973	5/31/2018 | 8:38 AM PDT
DocuSigned by: Tony Cevallos	Environmental Specialist	
Name (Print or Type) / Signature	Phone / Title	Date

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

CODE OF FEDERAL REGULATIONS (CFR)

Electronic Code of Federal Regulations

40CFR 260 THROUGH 282

APPENDIX G1
RCRA Inspection Report, "Large Quantity Generator Checklist"

This can be obtained from Environmental Services Audit team.

Phone number 561-694 -7069

APPENDIX H
Summary of Hazardous Waste Regulations

Code of Federal Regulations

40 *CFR* Part 124: Procedures for Decision-making

40 *CFR* Part 260: Hazardous Waste Management System-General

40 *CFR* Part 261: Identification and Listing of Hazardous Waste

40 *CFR* Part 262: Standards Applicable to Generators of Hazardous Wastes

40 *CFR* Part 263: Standards Applicable to Transporters of Hazardous Wastes

40 *CFR* Part 264: Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities

40 *CFR* Part 265: Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities

40 *CFR* Part 266: Standards for Materials Being Recycled/Reused

40 *CFR* Part 268: Land Disposal Restrictions

40 *CFR* Part 270: EPA-Administered Permit Programs-The Hazardous Waste Permit Program

40 *CFR* Part 271: Requirements for Authorization of State Hazardous Waste Programs

40 *CFR* Part 272: Approved State Hazardous Waste Management Programs

40 *CFR* Part 273: Universal Waste Management Systems

40 *CFR* Part 279: Used Oil Management Standards

40 *CFR* Part 280: Underground Storage Tanks

40 *CFR* Part 281: State Programs for Administering the Underground Storage Tank Program

40 *CFR* Part 282: Approved State Underground Storage Tank Programs

Florida Administrative Code

62-730

APPENDIX I

See pages 26 through 28

Chapter 62-737 - Management of Spent Mercury-Containing Lamps and Devices Destined for Recycling

CODE OF FEDERAL REGULATIONS

Subpart G—Spent Lead-Acid Batteries Being Reclaimed

40 CFR 266.80
Subpart G

APPENDIX L
Spray Can Memo

PIPER & MARBURY
1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2430
202-861-3900
FAX: 202-223-2085

BALTIMORE
NEW YORK
PHILADELPHIA
LONDON
EASTON, MD

DOUGLAS H. GREEN
202-861-3847

MEMORANDUM

TO: USWAG Low Volume Waste Committee

FROM: Douglas H. Green DHG
Piper & Marbury

DATE: December 10, 1993

RE: EPA Letter on Aerosol Cans and
Ohio EPA Letter on Recycling Lighting Wastes

We have recently obtained two interpretive letters that USWAG members may find of interest regarding the recycling of aerosol cans and lighting wastes (attached hereto). The first letter, from U.S. EPA, confirms that metal aerosol cans that are recycled are excluded from RCRA regulation under the scrap metal recycling exemption. The second letter, from Ohio EPA (provided to us by American Electric Power), declares that lighting wastes that are recycled are excluded from the definition of "solid waste" and therefore are not subject to hazardous waste regulation in Ohio.

The letters are summarized briefly below.

A. Recycling of Aerosol Cans Is Covered by the Scrap Metal Exclusion.

In its letter regarding aerosol cans, U.S. EPA declares that a steel aerosol can that does not contain a significant amount of liquid "would clearly meet the definition of 'scrap metal' . . . and thus would be exempt from RCRA regulation . . . if it were to be recycled" (under the scrap metal recycling exemption at 40 C.F.R. § 261.6(a)(3)(iv)). EPA letter at 2. The Agency explains that cans that have been punctured and drained would not contain "significant liquid" and thus would meet the scrap metal definition.

22.Z00909D

In addition, the Agency clarifies that the process of draining an aerosol can prior to its recycling also is exempt from RCRA regulation (and therefore is not regulated as "treatment") because draining the can "is part of the recycling process," which is exempt from RCRA regulation under 40 C.F.R. § 261.6(c). Id. Of course, if the materials drained from the can exhibit a hazardous characteristic or are listed hazardous wastes, they must be managed under all applicable Subtitle C requirements. Id.

While EPA's letter clarifies any ambiguity regarding the regulatory status of recycled aerosol cans under the federal program, the Agency cautions facilities in authorized states, whose programs may be more stringent than the federal program, to contact the appropriate state environmental agency to confirm that this interpretation is applicable in their state. In this regard, EPA's letter should serve as a strong basis for authorized states to adopt a similar position regarding the recycling of aerosol cans.

B. Ohio EPA Excludes Recycled Lighting Wastes from the Definition of Solid Waste.

In an interesting letter to a prospective lighting waste recycler, the Ohio EPA recently declared that lighting wastes (including fluorescent tubes and incandescent bulbs) that are recycled are excluded from the definition of "solid waste" and thus are exempt from hazardous waste regulation. In particular, Ohio EPA reasoned that lighting wastes that are recycled, "for example, by reclaiming usable components," would be classified as "characteristic by-products" and fall under the exclusion from the definition of solid waste for characteristic by-products that are reclaimed. Ohio EPA letter at 1. The exclusion from the definition of solid waste for reclaimed characteristic by-products is set forth at Table 1 to 40 C.F.R. § 261.2(c)(3).

While we are not aware of whether other states have adopted a similar position, Ohio's interpretation should serve as a strong precedent for urging other states to adopt a similar interpretation. We do not believe that U.S. EPA has taken a position on the regulatory status of recycled lighting wastes, but this is not unusual since EPA generally defers to RCRA authorized states (which includes most states) in making determinations regarding whether a material is a solid or hazardous waste.

* * * * *

If you have questions regarding the attached letters, please call Doug Green (202-861-3847) or Norman Rave (202-861-3841).

Attachments

22.Z009090

APPENDIX L
Spray Can Memo
(Continued)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 07 1993

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Mr. Gregory L. Crawford
Vice President, Recycling Operations
Steel Recycling Institute
Foster Plaza X
680 Anderson Drive
Pittsburgh, PA 15220

Dear Mr. Crawford:

Over the past several years we have received numerous questions concerning the regulatory status of used aerosol cans under the Resource Conservation and Recovery Act (RCRA) hazardous waste regulations. I understand that confusion about these issues may be hindering your efforts to increase steel aerosol can recycling in this country. As environmentally protective recycling is an important part of the Agency's waste management goals, I hope that this letter will help to answer some of these questions.

RESIDENTIAL AEROSOL CANS

First, I would like to emphasize that under the federal RCRA regulations, household waste (including aerosol cans) is excluded from the definition of hazardous waste (40 CFR 261.4(b)(1)). Thus, any aerosol cans generated by households are not regulated as hazardous waste. Because this exclusion attaches at the point of generation (i.e., the household) and continues to apply throughout the waste management cycle, household aerosol cans collected in municipal recycling programs and subsequently managed in recycling programs continue to be excluded from the hazardous waste management regulations.

The data you submitted[1] appear to confirm that the majority of used residential aerosol cans contain very little residual product or propellant. Along with your

[1] Texas Steel Aerosol Can Recycling Program, Final Report; Steel Can Recycling Institute (now Steel Recycling Institute); December 7, 1992.

experience working with many of the 600 or more communities currently recycling these cans, the data suggest that aerosol cans can be effectively recycled. The Agency does recommend that communities running residential steel recycling programs educate their participants to recycle only empty steel aerosol cans. Participants could also be educated to: 1) purchase only the amount of consumer products that they need to minimize the quantities of unused products, 2) give unused products to someone else who can use them, 3) take unused or partially full containers to a household hazardous waste collection program if available, or 4) dispose of the partially full containers as directed on the label.

COMMERCIAL/INDUSTRIAL AEROSOL CANS

I understand that you are also interested in facilitating the recycling of aerosol cans generated by commercial or industrial generators. The remainder of this letter discusses only these non-household waste items.

We have been asked whether aerosol cans exhibit the characteristic of reactivity. At this time, the Agency is not able to determine whether various types of cans that may have contained a wide range of products are reactive. However, a steel aerosol can that does not contain a significant amount of liquid would clearly meet the definition of scrap metal (40 CFR 261.1(c)(6)), and thus would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(iv) if it were to be recycled. Therefore, a determination of reactivity or any other characteristic would not be relevant. Aerosol cans that have been punctured so that most of any liquid remaining in the can may flow from the can (e.g., at either end of the can), and drained (e.g., with punctured end down), would not contain significant liquids.

It should be noted that since the process of emptying the aerosol cans is part of a recycling process (i.e., scrap steel recycling), this activity would be exempt from RCRA regulation under 40 CFR 261.6(c) (except as specified in 40 CFR 261.6(d)). The Agency recommends that these activities be conducted in a safe and environmentally protective manner and that care be taken to properly manage any contents removed from the container (both liquids and gases). Any liquids or contained gases removed from aerosol cans may be subject to regulation as hazardous wastes if they are listed in Subpart D of 40 CFR Part 261 or if they exhibit any characteristics of hazardous waste as described in Subpart C of 40 CFR Part 261.

We have also been asked to determine whether used aerosol cans would meet the definition of "empty" under 40 CFR 261.7. Again, if the steel cans are being recycled, it is not necessary to determine whether they are "empty" under the criteria listed in 40 CFR 261.7. As long as an aerosol can being recycled does not contain significant liquids, the can is exempt as scrap metal. However, in order to dispose of a can as non-hazardous waste (rather than recycle it), a generator would have to determine that the can is empty under 40 CFR 261.7 (or that the product it contained

was not hazardous), and that the can itself is not hazardous. If a can is to be disposed of, and either contains or is hazardous waste, it must be managed under all applicable regulations.

Please be aware that this letter addresses only the federal hazardous waste regulations. Authorized State agencies implement the RCRA program in their states (although some parts of the program may be implemented by the U.S. EPA Regions), and that state regulations may be more stringent than the federal regulations. Anyone managing aerosol cans should contact the appropriate state environmental agency or U.S. EPA Regional Office to determine how the regulations of that particular state will apply to their activities.

I hope this information is useful in your efforts to increase steel recycling. Thank you for the assistance that you and the Steel Recycling Institute have provided my staff in researching these issues. If you have any further questions, please call Charlotte Mooney of my staff at (202) 260-8551.

Sincerely,

Elizabeth A Cotsworth

for Jeffery D. Denit
Acting Director,
Office of Solid Waste

cc: Waste Management Division Directors,
U.S. EPA Regions I - X

APPENDIX M
Ni-Cad Battery Memo

Department of Environmental Protection

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

JUN 9 - 1995

Mr. Hunt Harween
Florida Power & Light-Turkey Point
9700 S.W. 34th Street
Florida City, Florida 33034

RE: Nickel-Cadmium Batteries

Dear Mr. Harween:

The letter is to document the meeting that was held on June 8, 1995 at the FPL-Riviera Beach facility between the Department and FPL to discuss the management of ni-cad batteries generated at the FPL-Turkey Point plant. Attending the meeting were yourself, Mr. Ken Simmons and Mr. Keith Drescher of FPL and myself.

FPL-Turkey Point is presently sending ni-cad communication batteries to the FPL-Riviera Beach facility for determination on the battery's ability to hold a charge (regeneration). The discussion involved the applicability of Title 40 Code of Federal Regulations (CFR), Parts 262-268, as adopted in Chapter 62-730, Florida Administrative Code, on the batteries under such a program. The FPL-Turkey Point plant does not have the ability to determine if the batteries are able to be regenerated. The batteries would remain in control of FPL and still be considered a usable product until it is determined that the batteries can not be regenerated. It is FPL's contention that sending the batteries to the FPL-Riviera Beach facility for determination would not subject the batteries to 40 CFR 262-268.

In reviewing this ni-cad battery management program, the Department agrees that such a program would not subject the batteries to 40 CFR 262-268. Upon determination that the batteries can not be regenerated, the batteries would at that time be considered spent and the FPL-Riviera Beach facility would become the generator of the waste. This program applies only to ni-cad batteries that have the potential to be regenerated. Other ni-cad batteries that can not be regenerated and can no longer be used for their intended purpose, would be considered spent and would become subject to 40 CFR 262-268 at the point of generation.

APPENDIX M
Ni – Cad Battery Memo
Continued

FPL-Turkey Point
Page 2 of 2

If you have any questions concerning this matter please contact me at 407/433-2650, Ext. 247.

Sincerely,

Jeffrey A. Smith
Environmental Manager
Hazardous Waste Section

cc: Mr. Ken Simmons, FPL
West Palm Beach, DEP file

APPENDIX N
Circuit Board Memo

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 26 1992

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Regulatory Status of Printed Circuit Boards

FROM: Sylvia K. Lowrance, Director
Office of Solid Waste

TO: Waste Management Division Directors,
Regions I-X

Printed electronic circuit boards are major components of personal computers in widespread use in the U.S. today. As updated computer equipment becomes available, the older (but still usable) equipment is often placed into surplus, or is reclaimed/reused. The old equipment may be disassembled and the usable parts salvaged. Parts may also be scrapped and processed for metal values due to their obsolescence, even though they are still usable.

After the printed circuit boards themselves are disassembled, recovering usable components, the boards are often shredded or otherwise processed, and/or burned as part of the reclamation process. Later, base metals (lead, copper) or precious metals (e.g., gold, silver, or platinum) can be reclaimed through additional processing.

The International Precious Metals Institute (IPMI) has written to EPA and requested a determination under RCRA Subtitle C for the status of used printed circuit boards. The regulatory status of unused circuit boards (considered commercial chemical products) and by-product wastes from circuit board production are not affected by this memorandum. The Agency is planning to study the area of used printed circuit boards in more depth; however, our interim interpretation is discussed below.

The EPA believes that based upon the way in which used printed circuit boards are originally generated, these materials most clearly meet the definition of spent materials (§ 261.1(c)(1)). However, we have further examined whether these boards can also be classified as scrap metal under § 261.1(c)(6). Scrap metal is defined based in large part on the physical appearance of a secondary material, dependent on the presence of metal, and includes secondary materials that would otherwise be spent materials or by-products.

As a matter of policy, the Agency has decided that unprocessed, spent (i.e., used) printed circuit boards are subject to regulation as scrap metal for the purposes of § 261.6(a)(3)(iv), and are therefore exempt from RCRA subtitle C regulation when recycled. The Agency has made this determination largely because 1) metals can be recovered from the pieces of metal parts that are an integral part of these circuit boards, and 2) unprocessed circuit boards are in a physical state similar to the type of recycled materials the Agency intended to be exempted by providing examples in the scrap metal definition (e.g., "metal parts . . . which when worn or superfluous can be recycled"). The physical state of the unprocessed spent circuit boards limits the dispersion of metal constituents during the handling and transport of the spent printed circuit boards similar to the materials defined as scrap metal in the regulatory language. (Note that this determination is limited to spent circuit boards and does not apply to other spent materials.)

After the boards are processed (including shredding, grinding, burning or smelting), the resulting material (e.g., shredded pieces, sweeps/ash, fluff, or baghouse dust) may no longer be similar to the materials that meet the definition of a scrap metal. The Agency believes that certain materials generated from the processing of spent printed circuit boards may be in a physical state which is inherently different from the more "traditional" scrap metal materials, the latter of which includes bars, turnings, rods, sheets, wire, bolts, etc. Spent circuit board processing, particularly those reclamation steps that do not involve simple physical processing, may generate materials in a form which allows the dispersion of hazardous constituents during subsequent handling. Therefore, some of these materials may not meet the definition of, nor the intent of, the scrap metal definition (analogous to the fluff generated by the shredding of scrap automobiles). Thus, at this point, the processed material may no longer be exempt from regulation as scrap metal, and could be subject to regulation as a spent material (e.g. shredded boards derived from spent circuit boards), a by-product (e.g. sweeps/ash), or a sludge (e.g. baghouse dust).

The processor must determine whether the processed material is a solid waste, and if so, whether it exhibits a characteristic of a hazardous waste, and manage the material accordingly (assuming the material no longer meets the definition of scrap metal). If the generator/processor determines that a material meets the regulatory definition of solid waste but believes the processed (i.e., partially reclaimed) material should be classified as a product rather than a solid waste, an application can be made to the Regional Administrator or authorized State regulatory agency for a case-by-case variance under section 260.30(c) of RCRA. In addition, if the processed material is a hazardous waste that contains economically significant amounts of recoverable precious metals then the materials would be subject to reduced regulations

under Part 266, Subpart F.

This determination is limited to circuit boards. For further information about this interpretation, please contact Allen Maples or Ross Elliott of the Regulatory Development Branch at (202) 260-8551.

cc: RCRA Enforcement Branch Chiefs, Regions I-X
NEIC
OWPE
OE
IPMI

APPENDIX O
West Palm Beach
Local Sewer System's Pretreatment Standards

Parameter	Maximum Allowable Concentration (mg/L) within a 24-hour period
Aluminum	16
Antimony	0.20
Arsenic, As	0.30
Barium	3.00
Beryllium	8.80
BOD*	8,800*
Cadmium, Cd	0.57
Chlorides	600
Chromium, Total, Cr(T)	2.99
Copper, Cu	2.80
Cyanide, Cn	0.30
Hydrogen Sulfate	5.0
Iron	10
Lead, Pb	0.29
Manganese	1.00
Mercury, Hg	0.19
Molybdemun, Mo	0.64
Nickel, Ni	2.90
Oil and Grease*	1,400*
Phenols	2.0
Selenium, Se	1.01
Silver, Ag	0.74
Strontium	0.20
TPH (Total Petroleum Hydrocarbons)	15
TSS*	10,000*
Zinc, Zn	0.49

*Wastewater surcharge fee will apply (see 5.3.5)

APPENDIX –P
SOLVENT WIPES RULES 2014

The final rule provides a definition for "wipe" and "solvent contaminated wipe" in 40 CFR 260.10.
Wipe means a woven or non-woven shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material.
Solvent-contaminated wipe means
- A wipes that, after use or after cleaning up a spill, either:
-Contains one or more of the F001 through F005 solvents;
–Exhibits a hazardous characteristic when that characteristic results from a listed solvent; or
–Exhibits only the hazardous waste characteristic of ignitability due to the presence of solvents that are not listed.
* Solvent-contaminated wipes that contain listed hazardous waste other than solvents, or exhibit the characteristic of toxicity, corrosivity, or reactivity due to contaminants other than solvents, are not eligible for the exclusions.
Specifically, the rule includes:
– A conditional exclusion from the definition of solid waste for solvent-contaminated wipes sent for cleaning ("reusable wipes") – 40 CFR 261.4(a)(26)
- A conditional exclusion from the definition of hazardous waste for solvent-contaminated wipes sent for disposal ("disposable wipes") –40 CFR 261.4(b)(18)

-The final rule includes two conditional exclusions, meaning that if one or more of the conditions are violated, the solvent-contaminated wipes could lose their excluded status and become subject to hazardous waste regulation from the point of generation.
The conditions for both the reusable wipes exclusion and disposable wipes exclusion are practically the same, which should ease implementation and compliance.

1- Storage

1-The rule uses a performance-based standard, rather than specifying types of containers.
Solvent-contaminated wipes must be accumulated, stored, and transported in non-leaking, closed containers.
The containers must be able to contain free liquids, if they occur (for example, from compression of the wipes).
- Containers do not need to be sealed during accumulation

(Must be closed except when adding or removing wipes).
A container must be sealed when the container is full, when the wipes are no longer being accumulated, and during transportation.

Standard is performance-based; facilities have flexibility in determining how to meet the standard.
•Wipes accumulated in an open-head drum or container would be considered closed when the cover makes complete contact between the fitted lid and the rim.
After accumulation and during transport, this same container must be sealed to meet this standard; thus, the rings must be clamped or bolted to the container.

2- Labeling
- Containers of solvent-contaminated wipes must be labeled "Excluded Solvent-Contaminated Wipes."
- Containers must be labeled during accumulation, storage, and transportation.

3-Accumulation Time Limit

Solvent-contaminated wipes may be accumulated by the generator for up to 180 days from the start date of accumulation for each container.

APPENDIX –P
SOLVENT WIPES RULES 2014

•Generators must keep documentation that the 180-day accumulation time limit is being met.
• Note: Since wipes may not be accumulated for more than180 days from the start date, including a start date on the accumulation container would add a degree of certainty to that process. However, that is not required. There

are other methods to document that the 180-day accumulation is being met, such as an established schedule for pickups, a log of container dates, etc.

4- "No free liquids" – the Heart of the Rule

-Solvent-contaminated wipes may not contain free liquids at the pointof being sent for cleaning on-site or sent off-site for cleaning or disposal.
•"No free liquids" is defined in 260.10 and is determined using the Paint Filter Liquids Test (Method 9095B in SW-846).
Paint Filter Liquids Test consists of placing a portion of the solvent-contaminated wipe into a paint filter, and if any of the material passes through and drops from the filter within five minutes, the material is deemed to contain free liquids.
Generators must document the process they are using to meet the "no free liquids" condition.
Free liquid spent solvent that is removed from the wipes is subject to hazardous waste regulation.

5- Recordkeeping

• Generators must maintain the following documentation at their site:
•Name and address of the destination facility (laundry, combustor, or landfill) that is receiving the solvent-contaminated wipes.
Documentation that the 180-day accumulation time limit is being met.
• Could include a service contract specifying frequency of pick-up, a log that lists the start date of each container, or container labels with the start date.
Description of the process the generator is using to meet the "no free liquids" condition.
Description of technologies, methods, sampling, or knowledge that a generator is using to ensure wipes contains no free liquids at the point of transport.

6- Handling Facilities

Reusable wipes must be sent to a laundry or dry cleaner whose discharge, if any, is regulated under sections 301 (effluent discharge restrictions) and 402 (permitting requirements) or section 307 (indirect discharge to a POTW) of the Clean Water Act.
•Disposable wipes must go to either
•a combustor regulated under section 129 of the Clean Air Act or a hazardous waste combustor, boiler, or industrial furnace regulated under 40 CFR 264, 265, or 266 subpart H; or
a municipal solid waste landfill regulated under 40 CFR 258 or a hazardous waste landfill regulated under 40 CFR 264 or 265.
Storage/labeling requirements continue to apply if solvent-Contaminated wipes are stored at handlers.
Any free liquids found by handling facilities must be removed and managed as hazardous waste.

RESOURCES

For more information on this rulemaking, go to:

http://www.epa.gov/epawaste/hazard/wastetypes/wasteid/solvents/wipes.h tm

Website includes a summary chart of the rule as well as FAQs.
http://www.epa.gov/wastes/hazard/wastetypes/wasteid/solvents/sumry_chrt_wipes_fnl_rul_070913.pdf