

File 12/22



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen M. Castille
Secretary

December 22, 2004

Mr. Mark Owens
Water Recovery, Inc.
1819 Albert Street
Jacksonville, Florida 32202

Dear Mr. Owens:

Water Recovery, Inc.
DEP/EPA ID FLR 000 069 062
Used Oil Processor Permit #79677-002-HO
Duval County – Used Oil Processor

Thank you for your assistance during the hazardous waste RCRA compliance evaluation inspection conducted by the Department at your facility on August 9, 2004.

Based on this inspection, your facility was found to be in violation of Florida Statutes and Rules concerning used oil. The violations are set forth in the "Summary of Violations and Corrective Actions" section of the inspection report. Subsequent to the inspection you submitted information to the Department stating that the violations had been corrected. Since your facility has returned to compliance no enforcement action will be taken.

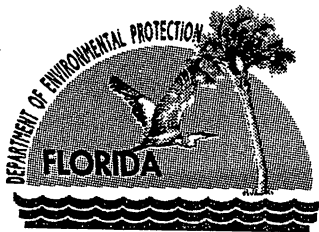
Enclosed is the inspection report and checklist that documents this visit. Your continued cooperation is appreciated. If you have any questions please call me at (904) 807-3300, ext. 3369.

Sincerely,

Alan Annicella
Environmental Specialist
Hazardous Waste Section

AAA:aa

Enclosures



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HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Compliance Evaluation ☐ Complaint ☐ Follow-up ☐ Permitting

FACILITY NAME: Water Recovery, Inc.

DEP/EPA ID #: FLR 000 069 062

STREET ADDRESS: 1819 Albert Street, Jacksonville, Florida 32202

MAILING ADDRESS: same as above

COUNTY: Duval

PHONE: (904) 475-9320

DATE: 8/9/04

TIME: 9:15 a.m.

HW Facility Status

- ☐ Non-handler
☒ CESQG
☐ SQG
☐ LQG
- ☐ Transporter
☐ Transfer facility
- ☒ TSD
- ☐ SQH
☐ LQH

Used Oil Facility Status

- ☒ Generator
☐ Transporter
☐ Transfer facility
☐ Marketer
☒ Processor
☐ On-spec. burner
☐ Off-spec. burner
- ☐ Filter generator
☐ Filter transporter
☒ Filter transfer facility
☐ Filter processor

Hg Facility Status

- ☐ Exempt
☐ Generator
☐ Transporter
- ☐ Hg recovery facility
☐ Hg reclamation facility

PCW facility status

- ☐ Producer
☐ Transporter
☒ Recovery facility

2. APPLICABLE REGULATIONS:

- | | | | |
|--|--|---|---|
| <input type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input checked="" type="checkbox"/> 40 CFR 264 |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 270 |
| <input type="checkbox"/> 40 CFR 273 | <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. **RESPONSIBLE OFFICIAL:** Mr. Mark Owen, Plant Manager

4. **INSPECTION PARTICIPANTS:** Mr. Mark Owen, Water Recovery, Inc.

Alan Annicella and Chris Bodin, FDEP

5. **LATITUDE/LONGITUDE:** 30°19'36" / 81°37'53"

6. **TYPE OF OWNERSHIP:** private federal state county municipal

7. **PERMIT #:** 79677-002-HO **ISSUE DATE:** 10/11/00 **EXP. DATE:** 10/11/05

PROCESS DESCRIPTION:

Water Recovery, Inc. (WRI) was inspected on August 5, 2004 as a requested compliance evaluation inspection (CEI). WRI's Plant Manager Mark Owens requested the CEI. WRI is an industrial wastewater pre-treatment facility and a used oil processor (Permit # 79677-002-HO). The facility consists of a main office, a laboratory, a maintenance shed, a container storage area, a used oil processing area, a wastewater processing area, and a solids/sludge/ residues management area. Mr. Mark Owens participated in the inspection.

WRI leases the property upon which it operates from DLAC/WRI. The property west of Bryan Street is operated by WRI. The property east of Bryan Street is operated by DLAC/WRI. The entire facility was previously owned and operated by Envirotech Southeast (ETSE) until 2000. The former ETSE facility received D018 (benzene) hazardous waste from off-site sources for processing and treatment. ETSE was considered a Treatment, Storage and Disposal facility under the Resource Conservation and Recovery Act (RCRA). ETSE operated under a Temporary Operating Permit. DLAC/WRI is now in post closure care.

SITE INSPECTION:

The CEI conducted on August 5, 2004 was limited to the WRI facility, which is an industrial wastewater pre-treatment facility and a used oil processor that operates under Permit # 79677-002-HO.

The facility treats and discharges wastewaters collected from marine, petroleum, transportation, environmental, and industrial sources. Incoming wastewater is treated by gravity separation and/or by dissolved air flotation. It is then chemically treated to adjust the pH in order to induce coagulation and flocculation. Segregated used oil is stored on site, analyzed and is transported to other processors for further processing and blending into recycled used oil products. WRI is currently sending their used oil to either Georgia Petroleum, Inc. in Valdosta, Georgia or U.S. Filter located in Plant City, Florida

The wastewater fraction receives further treatment and processing and is discharged to the local POTW (JEA-Buckman Wastewater Plant). The solids/sludges/residues generated from the facility's activities are de-watered, loaded into roll-off containers, analyzed, and then disposed at an appropriate disposal facility. The waste analyses on the solids/sludges/residues indicate that it is a non-hazardous solid waste. WRI has been sending the solids/sludges/residues to the Cheshire Island landfill.

Pursuant to the WRI used oil processor permit, all incoming shipments of used oil, oily wastewater, or other industrial wastewaters require a pre-approved waste profile before arriving at the facility. Upon arrival, the incoming material is sampled and compared to the fingerprint analysis for total organic halogen (TOX) compounds, pH, flashpoint, and general physical appearance prior to final acceptance and off-loading.

In the loading/off-loading station, located within secondary containment, the facility uses spill collection containers as primary containment to catch leaks from the valves beneath trucks during transfer procedures. Similar containers are used at several other transfer points and line connections within the processing area. The containers observed at the time of inspection were properly labeled with the words "Used Oil."

In the laboratory, the facility generates small amounts of hazardous waste from analytical testing. The waste solvents (designated D001/D002/D030/F003/F005 hazardous waste) are collected in closed and labeled satellite containers located within the laboratory. When needed, the hazardous wastes generated from laboratory operations are manifested for disposal to Perma-Fix of Florida (FLD 980 711 071).

WRI is currently accepting used oil filters from various off site locations. The used oil filters are stored on site for greater than 10 days. WRI has not registered as a used oil filter transfer facility. **WRI is in violation of Section 62-710.850 (4), Florida Administrative Code (F.A.C.) and Specific Condition Part III (2) of permit number 79677-002-HO.** The used oil filters are manifested to U.S. Filter in Jacksonville (FLD 065 680 613) for processing.

RECORDS REVIEW:

WRI was issued permit number 79677-002-HO on October 11, 2000. The permit will expire on October 11, 2005. The permit lists WRI's facility's EPA identification number incorrectly. **This is an area of concern.** WRI should ensure that the correct identification number: FLR 000 069 062, is included in the application for renewal of the permit. Additionally, WRI should review all manifests, documents and other related items to ensure that the correct EPA identification number is listed.

A review of the facility's operating records, including state registrations for used oil, required inspections, financial assurance records, incoming and outgoing analysis found them to be in order.

For inbound manifests, the manifests did not contain the EPA identification number of the used oil transporter. **WRI is in violation of 40 CFR 279.56 (a) and Specific Condition Part I (21) of permit number 79677-002-HO.**

For outbound manifests, some manifests showed an incorrect generator EPA ID number, some did not include the name of the transporter, some did not include the EPA ID number of the transporter and some had a transporter name with an EPA ID number of a different facility. **WRI is in violation of 40 CFR 279.56 (b) and Specific Condition Part I (21) of permit number 79677-002-HO.**

WRI is using GeoVac to transport used oil off-site to Georgia Petroleum, Inc. in Valdosta, Georgia. GeoVac does not have an EPA identification number and has not registered its used oil

handling activities with the State of Florida. **WRI is in violation of 40 CFR 279.58 and Specific Condition Part I (23) of permit number 79677-002-HO.**

WRI personnel have not been completing the approved training program included in Attachment 12 of the permit application. WRI stated that they would train employees annually. **WRI is in violation of Section 62-710.800 and Specific Condition Part I (25) of permit number 79677-002-HO.**

The emergency coordinator list in the contingency plan is not up-to-date. **WRI is in violation of 40 CFR 279.52 (b)(2) and Specific Condition Part I (17) of permit number 79677-002-HO.**

WRI generates approximately one gallon per month of various laboratory waste solvents. This waste is sent to Perma-Fix of Florida (FLD 980 711 071) for disposal. Water Recovery, Inc. is currently a Conditionally Exempt Small Quantity Generator of hazardous waste.

SUMMARY OF VIOLATIONS AND CORRECTIVE ACTIONS:

40 CFR 279.56 (a) – Tracking Shipments of Used Oil Specific Condition Part I (21) – Permit Number 79677-002-HO

VIOLATION:

WRI is accepting used oil being transported on manifests that do not include the EPA identification number of the used oil transporter.

CORRECTIVE ACTION:

No further action is required. Subsequent to the inspection, WRI submitted information to the Department stating that manifests would be filled out completely and correctly.

40 CFR 279.56 (b) – Tracking Shipments of Used Oil Specific Condition Part I (21) – Permit Number 79677-002-HO

VIOLATION:

WRI is shipping used oil to other processors on manifests that show: an incorrect generator EPA ID number, did not include the name of the transporter, did not include the EPA ID number of the transporter or had a transporter name with an EPA ID number of a different facility.

CORRECTIVE ACTION:

No further action is required. Subsequent to the inspection, WRI submitted information to the Department stating that manifests would be filled out completely and correctly.

40 CFR 279.56 (b)(2) – Contingency Plan

Specific Condition Part I (17) – Permit Number 79677-002-HO

VIOLATION:

The emergency coordinator list in the contingency plan is not up-to-date.

CORRECTIVE ACTION:

No further action is required. Subsequent to the inspection WRI submitted information to the Department stating the contingency plan had been updated. WRI should ensure that the contingency plan is reviewed and amended as needed.

40 CFR 279.58 – Off-site Shipments of Used Oil

Specific Condition Part I (23) – Permit Number 79677-002-HO

VIOLATION:

WRI is using a used oil transporter that does not have an EPA identification number.

CORRECTIVE ACTION:

No further action is required. Subsequent to the inspection WRI submitted information to the Department stating that they would only use a used oil transporter that has obtained an EPA identification number and has registered with the State of Florida.

Section 62-710.800, F.A.C. – Permit for Used Oil Processing Facilities

Specific Condition Part I (25) – Permit Number 79677-002-HO

VIOLATION:

WRI has not been training their employees in accordance with their permit and Attachment 12 of the permit application.

CORRECTIVE ACTION:

No further action is required. Subsequent to the inspection, WRI submitted information to the Department stating that all employees had undergone appropriate training. WRI is reminded that its employees should be trained within 6 months of being hired or assigned to a new position at the facility. Additionally, facility personnel should review the training annually. Records documenting the training should be maintained on-site.

Section 62-710.850 (4), F.A.C. – Management of Used Oil Filters

Specific Condition Part III (2) – Permit Number 79677-002-HO

VIOLATION:

WRI accepts used oil filters from off site locations. The used oil filters are stored on site for greater than 10 days. WRI has not registered as a used oil filter transfer facility.

CORRECTIVE ACTION:

No further action is required. Subsequent to the inspection, WRI notified the Department they are operating a used oil filter transfer facility.

Site Inspector:

Alan A. Annicella 11/24/04

Alan A. Annicella
Environmental Specialist
Hazardous Waste Section

Approved by:

DBK

for

Vicky G. Valade
Environmental Manager
Hazardous Waste Section

Site Inspector:

Chris Bodin 11-24-04

Chris Bodin
Environmental Engineer
Hazardous Waste Section

Approved by:

DBK

Ashwin B. Patel
Hazardous Waste Supervisor
Hazardous Waste Section

USED OIL PROCESSOR CHECKLIST

Facility Name: Water Recovery, Inc. Date: August 9, 2004
Facility Representative: Mark Owens Facility ID: FLR 000 069 062
Inspector: Alan Annicella and Chris Berlin Registration # 79677-002-HO
Alan A. Annicella

40 CFR 279 Subpart F -- Processor Standards

1. Is the facility exempt under any of the following? (279.50(a)) Y ☐ N ☒
Transporter or burner processing incidental to normal course of operations? Y ☐ N ☒
Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.
2. Does the processor have an EPA ID Number? (279.51(a)) Y ☒ N ☐
3. Is the processor Registered? (62-710.500(1)(b)) Y ☒ N ☐
4. Does the processor have a general permit? 62-710.800(1)) Y ☒ N ☐
5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was the notification for renewal submitted 30 days prior to expiration of the general permit? (62-710.800(2)) Y ☐ N ☐ they will

Oil Filter Processing Standards-- 62-710.850 F.A.C.

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y ☐ N ☒
Is the facility a registered used oil filter processor? (62-710.850) Y ☐ N ☐ n/a
2. Are the filters stored in above ground containers which are: (62-710.850(6))
In good condition? Y ☒ N ☐
Closed or otherwise protected from weather? Y ☒ N ☐
Labeled "Used Oil Filters"? Y ☒ N ☐
Stored on an oil impervious surface? Y ☒ N ☐
3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))
Destination or end use of the processed filters? Y ☐ N ☐
Name and street address of each destination or end user? Y ☐ N ☐
Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y ☐ N ☐ n/a
4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y ☐ N ☐

Facility : _____
Date: _____

Oil Management Standards - 279.54

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y X N _____
2. If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C. rules?
(Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y X N _____
- Is secondary containment consisting of a floor and dike which are impervious to oil provided for ASTs? Applies to all ASTs regardless of size per 279.54(d & e) Y X N _____
3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y X N _____
4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) Y X N _____
- Is the containment system impervious to oil so as to prevent migration? Y X N _____
5. Are ASTs, UST tank fill lines and containers labeled "used oil"? (279.54(f)) Y X N _____
6. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) Y X N _____

General Facility Standards - 279.52

1. Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment? (279.52(a)(1)) Y X N _____
2. Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel?(279.52(a)) Y X N _____
3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance from local fire departments? (279.52(a)(2)(ii)) Y X N _____
- Is there immediate access to this equipment by all personnel who are engaged in pouring, mixing, spreading or otherwise handled, either directly or by voice or visual contact with another employee? (279.52(a)(4)) Y X N _____
4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y X N _____
5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y X N _____
6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (279.52(a)(2)(iii)) Y _____ N _____ n/a
7. Is the emergency equipment inspected and tested periodically?
Frequency? monthly / yearly Y X N _____

Facility : _____
Date: _____

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (279.52(a)(5)) Y X N _____

9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))

Fire Department: _____ Y X N _____

Police: _____ Y X N _____

Hospital: _____ Y X N _____

Emergency Response Contractor: _____ Y X N _____

10. If not, has the facility attempted to do so and is the refusal documented? Y _____ N _____ n/a

Contingency Plans and Emergency Response -- 279.52(b)

1. Does the facility have a contingency plan? Y X N _____

2. Is it at the facility and easily available? Y X N _____

3. Does the plan include:

Fire Response Procedure: (compare to 279.52(b)(6)) N/A _____ Y X N _____

Spill Response Procedures: " N/A _____ Y X N _____

Explosion Response Procedures: " N/A _____ Y X N _____

Instructions for handling contaminated materials & residues Y X N _____

A description of arrangements with local authorities: N/A _____ Y X N _____

Emergency Coordinators: (Name) Mark Owens Y X N _____

Addresses and telephone numbers of Emergency Coordinators: Y X N _____

Emergency equipment list: Y X N _____

Specifications and capabilities of emergency equipment: Y X N _____

Locations of emergency equipment: Y X N _____

An evacuation plan and routes: Y X N _____

Evacuation/alarm signals: Y X N _____

External reporting procedures: Y X N _____

Internal recordkeeping requirements: Y X N _____

4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) Y _____ N X

Corrected
Violation

5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (279.52(b)(3)) Y X N _____

6. Is the emergency coordinator authorized to commit funds for incident response? Y X N _____

7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) Y _____ N _____ n/a

9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y _____ N _____ n/a

Facility : _____
Date: _____

Rebuttable Presumption and Analysis Plan -- 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y X N _____
2. Is the 1,000 ppm halogen determination made by testing? Y X N _____
- If so, does the analysis plan cover: (279.55(a)(2))
- Sampling methods? Y X N _____
- Frequency of sampling? Y X N _____
- Analytical Methods? Y X N _____
- Is the 1,000 ppm halogen determination made by process knowledge? . Y _____ N X
- If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y _____ N _____ n/a
3. Have any analyses showed exceedances of the 1,000 ppm level? Y _____ N X
- If so, was the oil managed as hazardous waste? Y _____ N _____ n/a
- If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A _____ Y _____ N _____ n/a
4. Is the used oil fuel specification determination made by testing? X
- If so, does the analysis plan cover: (279.55(b)(2))
- Sampling methods? Y X N _____
- Whether the oil will be tested before or after processing? Y X N _____
- Frequency of sampling? Y X N _____
- Analytical Methods? Y X N _____
- Is the used oil fuel specification determination made by process knowledge? Y _____ N X
- If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y _____ N _____ n/a
5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59) N/A _____ Y _____ N X
- If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A _____ Y X N _____
6. Are test records or copies of records providing basis for determinations kept for 3 years? Y X N _____

Facility : _____
Date: _____

Recordkeeping and Reporting -- 279.57, 62-710.510-520 F.A.C.

1. Do used oil acceptance records include: (279.56(a))

Name & address of the generator or off site source of the used oil?	Y <u>X</u>	N _____
EPA ID # of oil provider (if applicable)?	Y <u>X</u>	N _____
Name & Address of the transporter delivering the oil to the facility?	Y <u>X</u>	N _____
EPA ID # of the transporter delivering the oil	Y _____	N <u>X</u>
Quantity of oil shipped?	Y <u>X</u>	N _____
Type of oil received (62-710.510(1)(c))	Y <u>X</u>	N _____
Date of shipment?	Y <u>X</u>	N _____

corrected
Violation

2. Do used oil delivery records include: (279.56(b), also check marketer requirements)

Name & Address of receiving facility? (burner, processor or disposal site)	Y <u>X</u>	N _____
EPA ID # of receiving facility?	Y <u>X</u>	N _____
Name & Address of transporter delivering the oil?	Y _____	N <u>X</u>
EPA-ID # of transporter?	Y _____	N <u>X</u>
Quantity of oil delivered?	Y <u>X</u>	N _____
End Use of the oil? (62-710.510(1)(e))	Y <u>X</u>	N _____
Date of delivery?	Y <u>X</u>	N _____

corrected
Violation

3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y X N _____

4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y X N _____

If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y _____ N _____

n/a

5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y X N _____

Closure -- 62-710.800(3) F.A.C. and 279.54(h)

1. Has the facility submitted a written closure plan? (62-710.800(3)(a))

Y X N _____

2. Does the plan include procedures for removing containers of oil and residues?

Y X N _____

Cleaning and decontaminating tanks and ancillary equipment?

Y X N _____

Removing contaminated soils?

Y X N _____

Eliminating the need for further maintenance?

Y X N _____

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.

CESQG CHECKLIST

Facility Name: Water Recovery, Inc. Date: August 9, 2004
 Facility Representative: Mark Owens Facility ID #: FLR 000 069 062
 SIC Codes: Used Oil Processor Inspector: Alan Annicella + Chris Berlin
Alan A. Annicella

40 CFR 261.5

1. Describe the facility's hazardous and potentially hazardous waste streams 40 CFR 262.11:

Waste	EPA Waste #s	Generation Rate	Disposal facility?	Proper Waste ID?
lab waste solvents	D001/A002/R030/ F003/F005	≈ 1 g/month	Perma - Fix FLR 980 711 071	Y

(describe discrepancies in waste identification in narrative)

Standards for Conditionally Exempt Small Quantity Generators - 40 CFR 261.5

2. Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? yes ☒ no ☐
 And less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? yes ☐ no ☐ n/a
3. Has the facility obtained an EPA ID #? (not required for CESQGs) yes ☒ no ☐
4. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? (40 CFR 261.5) Describe discrepancies in narrative. yes ☒ no ☐
5. Is the facility disposing of hazardous waste by mixing with used oil? yes ☐ no ☒
6. Can the facility document proper disposal of all hazardous wastes? yes ☒ no ☐
7. Are any hazardous wastes treated or disposed of on site? Describe in narrative: yes ☐ no ☒
8. Are there any unpermitted discharges of other wastes to the environment? yes ☐ no ☒