



# FLORIDA DEPARTMENT OF Environmental Protection

Northwest District  
160 W. Government Street, Suite 308  
Pensacola, FL 32502

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

February 8, 2022

Apalachee Pole Company, INC.  
Ryan Bruner, Plant Manager  
18561 NW CR 12  
Bristol, FL 32321

SUBJECT: Department of Environmental Protection v. Apalachee Pole Company, INC.  
OGC File No.: #22-0205  
EPA ID: FLD981920929

Mr. Bruner:

The State of Florida Department of Environmental Protection (Department) finds that Apalachee Pole Company, INC. (Respondent) failed to properly accumulate hazardous waste, comply with the accumulation time limit, remove waste from the drip pad(s) every 90 days, provide documentation describing type and amount of employee training, properly document drip pad cleanings, conduct drip pad inspections, properly document weekly container inspections, and include required contingency plan content, in violation of Title 40 Code of Federal Regulations (CFR) Parts 262 & 265 and of Chapter 62-730 Florida Administrative Code (F.A.C.). Before sending this letter, the Department requested that the Respondent undertake certain actions to resolve the violation(s). These actions have since been completed. However, due to the nature of the violation(s), the Respondent remains subject to civil penalties. The Respondent is also responsible for costs incurred by the Department during the investigation of this matter.

## The Department's Offer

Based on the violations described above, the Department is seeking \$ 12,510 in civil penalties and \$ 500 for costs and expenses the Department has incurred in investigating this matter, which amounts to a total of \$ 13,010. The civil penalties are apportioned as follows: \$ 1,420 for violation of 40 CFR 262.15(a)(4); \$ 430 for violation of 40 CFR

262.15(a)(5); \$ 1,420 for violation of 40 CFR 262.17(a); \$ 5,670 for violation of 40 CFR 262.17(a)(3); \$ 1,420 for violation of 40 CFR 262.17(a)(7)(i)(A); \$ 430 for violation of 40 CFR 262.261(a); \$ 430 for violation of 40 CFR 262.261(e); \$ 430 for violation of 40 CFR 265.443(i); \$ 430 for violation of 40 CFR 265.444(b); and \$ 430 for violation of 62-730.160(3), F.A.C.

### **Respondent's Acceptance**

If you wish to accept this offer and fully resolve the enforcement matter pending against the Respondent, please sign this letter and return it to the Department at Attn: Ms. Monica Hardin, Florida Department of Environmental Protection, Northwest District, 160 W Government St Suite 308, Pensacola, Florida 32502 by **February 23, 2022**. The Department will then countersign it and file it with a designated clerk of the Department. Once the document is filed with the designated clerk, it will constitute a final order of the Department pursuant to Section 120.52(7), F.S. and will be effective unless a request for an administrative hearing is filed by a third party in accordance with Chapter 120, F.S. and the attached Notice of Rights.

By accepting this offer you, Ryan Bruner:

- (1) certify that you are authorized and empowered to negotiate, enter into, and accept the terms of this offer in the name and on behalf of Respondent;
- (2) acknowledge and waive Respondent's right to an administrative hearing pursuant to Sections 120.569 and 120.57, F.S., on the terms of this offer, once final;
- (3) acknowledge and waive Respondent's right to an appeal pursuant to Section 120.68, F.S.; and
- (4) acknowledge that payment of the above amount does not constitute a waiver of the Department's right, if any, to recover emergency response related costs and expenses for this matter.

The Department acknowledges that the Respondent's acceptance of this offer does not constitute an admission of liability for the violation(s) referenced above.

### **Respondent's Performance**

After signing and returning this document to the Department,

- (1) Respondent must pay \$ 13,010 in full by **February 22, 2022**.
- (2) Respondent shall make all payments required by this Order by cashier's check, money order or on-line payment. Cashier's check or money order shall be made payable to the "Department of Environmental Protection" and shall include both

the OGC number assigned to this Order and the notation "Water Quality Assurance Trust Fund." Online payments by e-check can be made by going to the DEP Business Portal at: <http://www.fldepportal.com/go/pay/>. It will take a number of days after this order is final, effective and filed with the Clerk of the Department before ability to make online payment is available.

The Department may enforce the terms of this document, once final, and seek to collect monies owed pursuant to Sections 120.69 and 403.121, F.S.

Until clerked by the Department, this letter is only a settlement offer and not a final agency action. Consequently, neither the Respondent nor any other party may request an administrative hearing to contest this letter pursuant to Chapter 120, F.S. Once this letter is clerked and becomes a final order of the Department, as explained above, the attached Notice of Rights will apply to parties, other than the Respondent, whose interests will be substantially affected.

Electronic signatures or other versions of the parties' signatures, such as .pdf or facsimile, shall be valid and have the same force and effect as originals. No modifications of the terms of this Order will be effective until reduced to writing, executed by both Respondent and the Department, and filed with the clerk of the Department.

Please be aware that if the Respondent declines to respond to the Department's offer, the Department will assume that the Respondent is not interested in resolving the matter and will proceed accordingly.

If you have any questions, please contact Monica Hardin at 850-595-0620 or at [Monica.Hardin@FloridaDEP.gov](mailto:Monica.Hardin@FloridaDEP.gov).

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Mullins Orr". The signature is written in a cursive, flowing style.

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Elizabeth Mullins Orr  
District Director  
Northwest District

FOR THE RESPONDENT:

I, Ryan Bruner [Type or Print Name], HEREBY ACCEPT  
THE TERMS OF THE SETTLEMENT OFFER IDENTIFIED ABOVE.

By: [Signature] Date: 2/10/2022

Title: General Manager, Apalachee Pole Company Inc.  
[Type or Print]

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**FOR DEPARTMENT USE ONLY**

DONE AND ORDERED this 15th day of February, 2022, in  
Orange County, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Elizabeth Mullins Orr  
Elizabeth Mullins Orr  
District Director  
Northwest District

Filed, on this date, pursuant to section 120.52, F.S., with the designated Department  
Clerk, receipt of which is hereby acknowledged.

Anita L. Spencer February 15, 2022  
Clerk Date

Attachments: Notice of Rights  
Apalachee Pole Co. Nov 2021 Inspection Report  
Apalachee Pole Co. Warning Letter

Final clerked copy furnished to:  
Lea Crandall, Agency Clerk ([lea.crandall@dep.state.fl.us](mailto:lea.crandall@dep.state.fl.us))

## NOTICE OF RIGHTS

Persons who are not parties to this Order, but whose substantial interests are affected by it, have a right to petition for an administrative hearing under Sections 120.569 and 120.57, Florida Statutes. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition concerning this Order means that the Department's final action may be different from the position it has taken in the Order.

The petition for administrative hearing must contain all of the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address, any e-mail address, any facsimile number, and telephone number of the petitioner, if the petitioner is not represented by an attorney or a qualified representative; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of when and how the petitioner received notice of the agency decision;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

The petition must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS# 35, Tallahassee, Florida 32399-3000 or received via electronic correspondence at [Agency\\_Clerk@floridadep.gov](mailto:Agency_Clerk@floridadep.gov), within 21 days of receipt of this notice. A copy of the petition must also be mailed at the time of filing to the District Office at the address indicated above. Failure to file a petition within the 21-

day period constitutes a person's waiver of the right to request an administrative hearing and to participate as a party to this proceeding under Sections 120.569 and 120.57, Florida Statutes. Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.



# FLORIDA DEPARTMENT OF Environmental Protection

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

Northwest District  
160 W. Government Street, Suite 308  
Pensacola, FL 32502

December 27, 2021

Mr. Ryan Bruner, Plant Manager  
Apalachee Pole Company, Inc.  
18561 NW CR 12  
Bristol, FL 32321  
[rbruner@rex-lumber.com](mailto:rbruner@rex-lumber.com)

Re: Warning Letter #WL12-27  
Apalachee Pole Company, Inc.  
Facility ID No.: FLD981920929  
Liberty County

Dear Mr. Bruner:

A routine hazardous waste compliance inspection was conducted at Apalachee Pole Company, Inc. on November 17, 2021. During this inspection, possible violations of chapter 403, Florida Statutes, chapter 62-730, Florida Administrative Code and 40 Code of Federal Regulations Parts 262 and 265 were observed.

During the inspection Department personnel noted the following:

- Open, un-labeled container(s) accumulating hazardous waste;
- Failure to comply with 90-day accumulation time limit;
- Failure to remove waste from the drip pad(s) every 90 days;
- Failure to describe type and amount of employee training;
- Failure to address responses to explosions and releases to air, soil, and surface water in contingency plan;
- Failure to include emergency equipment descriptions and capabilities in contingency plan;
- Failure to document each cleaning and procedure used on the drip pad(s);
- Failure to conduct weekly and after storm inspections of the drip pads(s); and
- Failure to properly document weekly (container) inspections of the 90-day central accumulation area.

For a detailed description of the violations, please review the inspection report at the following:  
[Apalachee Pole Co. November 2021 HW Inspection Report](#)

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to sections 403.121, 403.131, 403.141, and 403.727, Florida Statutes.

Please respond in writing within **15 days** of your receipt of this Warning Letter. Please direct your written response to Ms. Monica Hardin at [Monica.Hardin@FloridaDEP.gov](mailto:Monica.Hardin@FloridaDEP.gov) or call (850)

Apalachee Pole Company, Inc.  
Facility ID No.: FLD981920929  
Warning Letter  
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595-0620 to discuss. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with section 120.57(5), Florida Statutes. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,



On behalf of  
Elizabeth Mullins Orr, Director  
Northwest District  
Florida Department of Environmental Protection

EMO/mh

ec: Jammie Taylor, Apalachee Pole Co.: [jtaylor@rex-lumber.com](mailto:jtaylor@rex-lumber.com)  
Austin West, Rex Lumber: [awest@rex-lumber.com](mailto:awest@rex-lumber.com)  
Margarete Vest, PLE Consulting: [ple.mmvest@gmail.com](mailto:ple.mmvest@gmail.com)  
Corinna Clanton, DEP-Panama City: [Corinna.Clanton@FloridaDEP.gov](mailto:Corinna.Clanton@FloridaDEP.gov)  
Courtney Triplett, DEP-Tallahassee: [Courtney.Triplett@FloridaDEP.gov](mailto:Courtney.Triplett@FloridaDEP.gov)  
Cliff Richardson, DEP-Environmental Manager: [Cliff.J.Richardson@FloridaDEP.gov](mailto:Cliff.J.Richardson@FloridaDEP.gov)





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

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**FACILITY INFORMATION:**

**Facility Name:** Apalachee Pole Co Inc  
**On-Site Inspection Start Date:** 11/17/2021 **On-Site Inspection End Date:** 11/17/2021  
**ME ID#:** 6059 **EPA ID#:** FLD981920929  
**Facility Street Address:** 18561 NW CR 12, Bristol, Florida 32321  
**Contact Mailing Address:** PO Box 610, Bristol, Florida 32321-0610  
**County Name:** Liberty **Contact Phone:** (850) 643-2238

**NOTIFIED AS:**

LQG (>1000 kg/month)

**WASTE ACTIVITIES:**

**Generator:** LQG

**INSPECTION TYPE:**

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

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Monica Hardin, Inspector  
Corinna Clanton, Environmental Specialist; Courtney Triplett, Environmental Specialist;  
**Other Participants:** Ryan Bruner, Plant Manager

**LATITUDE / LONGITUDE:** Lat 30° 20' 47.248" / Long 84° 59' 33.716"

**NAIC:** 321114 - Wood Preservation

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Apalachee Pole Company (APC or facility) is a 45-acre wood treatment facility located in Liberty County, Florida. APC has operated at this location since 1986. The facility consists of a wood treatment plant that uses a self-contained waterborne chromated copper arsenate (CCA) pressure vacuum wood preserving unit with an operating drip pad system (per 40 CFR 265 Subpart W). The facility specializes in the preservation treatment of wood pilings and poles primarily used as utility poles, and pilings for homes, decks, and salt & freshwater docks. The facility currently operates Monday through Friday 8am-5pm with eighteen employees. APC is notified with the Department as a Large Quantity Generator (LQG) of hazardous waste.

APC was last inspected for hazardous waste compliance on February 29, 2016 with no out-of-compliance issues noted.

A routine hazardous waste compliance evaluation inspection (CEI) was conducted on November 17, 2021 to determine compliance with the applicable state and federal regulations by Monica Hardin, Corinna Clanton, and Courtney Triplett of the Florida Department of Environmental Protection. The inspection was facilitated by Mr. Ryan Bruner, Plant Manager, Mr. Austin West, Safety Manager (Rex Lumber), and Margarete Vest (PLE Consulting).

Department personnel wore personal protective equipment while onsite including safety boots, hard hats, eye protection, and face mask coverings (while indoors).

**Process Description:**

Due to Covid-19, the facility was contacted in advance of the onsite inspection and an opening interview was conducted via Teams Meeting (with call-in) on November 15, 2021. Electronic records were requested in advance as well for offsite review. On November 17, 2021 inspectors arrived onsite at approximately 10:45am

## Apalachee Pole Co Inc Inspection Report

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and were received by Mr. Bruner.

Apalachee Pole Company consists of two primary work areas, the treatment plant and the framing deck, surrounded by treated wood storage and Rex Lumber Company. There is no clear definition between Apalachee Pole Co. property and Rex Lumber Company property and it appears wood products are commonly moved between the two for various reasons such as cutting and peeling.

### Framing Deck:

The framing deck is where wood is cut, drilled, and tagged per order specifications prior to treatment. One satellite accumulation area (SAA) was observed with an aerosol can puncture unit attached to a 55-gallon drum; immediately adjacent to the SAA, was one 55-gallon drum and one 5-gallon bucket labeled as universal waste empty aerosol cans (photo 2). Through electronic communication on December 9, 2021, the facility was provided with links and information related to aerosol can management to assist the facility with determining the most appropriate disposal method for their operation. The SAA container appeared closed and appropriately labeled with 'hazardous waste' and an indication of the content's hazards. Fire extinguishers were noted in the area. During the closing interview, we requested the facility ensure 'no smoking' signs (per 40 CFR 262.17(a)(1)(vi)(B)) are appropriately located, as notes were not made during the inspection indicating their presence; a photo was provided December 7, 2021 by the facility (photo 3).

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### Treatment Plant:

The treatment plant consists of a treatment cylinder (20,061 gallons), a concentration tank (6,000 gallons), three work tanks (each 25,000 gallons), a combination tank, and two drip pads (photos 4-5). The cylinder and tanks are all located within a covered building with a sealed concrete floor and sidewalls, with a drip pad located on each side of the treatment cylinder. Once an order of wood is set for treatment, the CCA is pumped into a work tank, where water is added to make the solution, the wood is placed in the treatment cylinder, the CCA solution is added, and the cylinder is brought to the necessary pressure to treat the wood. After treatment, the wood sits in the cylinder (as time allows) to remove any drips; the free CCA solution is vacuum pumped from the cylinder back to the work tank. Mr. Powell, Treating Plant Operator, stated the longer he can allow a treated wood to sit in the cylinder reduces drips on the drip pads. Sunken sump systems are located at either end of the cylinder prior to the drip pads. Safety equipment including fire extinguishers and eye wash stations were noted throughout the treatment plant.

Hazardous waste is centrally accumulated in a designated area on the east drip pad (photo 6). At the time of inspection, we observed twenty-six 55-gallon drums labeled as hazardous waste for drip pad wastes. Each drum was labeled with an accumulation start date of November 16, 2021, 'hazardous waste', and 'toxic' and 'corrosive' to indicate the contents' hazards. The drums appeared appropriately labeled, in good condition, and closed.

At the base of the western cylinder, we observed an open bin used to catch sludge/dirt as wood is moved into and out of the cylinder (photo 1). The facility indicated a similar bin is also located on the east end. It was explained, as needed, the material is removed from the bins, placed directly into drums, and labeled for hazardous waste disposal. Per 40 CFR 262.15(a)(4) and (5), a container holding hazardous waste must be closed during accumulation except when adding, removing, consolidating, or temporary venting (as necessary) and a generator must label its containers with 'hazardous waste' and an indication of the contents' hazards.

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### Records Review:

Prior to the onsite inspection, requested records were provided electronically. To reduce time spent onsite and to implement safe distancing practices, records were reviewed following the onsite inspection. The following records were reviewed: the contingency plan and associated quick reference guide, hazardous waste manifests, weekly inspections, job descriptions, training records, and drip pad assessments, procedures, and removal records.

The provided contingency plan was updated November 10, 2021 primarily due to change of personnel; the associated quick reference guide appears to have been updated at the same time. The contingency plan addresses actions facility personnel will take in response to fires and releases of hazardous waste but does not

## Apalachee Pole Co Inc Inspection Report

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address explosions or how releases specifically to the air, soil, or surface water will be handled (per 40 CFR 262.261(a)). The contingency plan contains a list of emergency equipment and its general location but is lacking information related to physical descriptions and brief outlines of their capabilities (per 40 CFR 262.261(e)). There was no documentation provided to indicate the date the contingency plan was last provided to emergency response teams (per 40 CFR 262.262(a)); through the November 30, 2021 electronic correspondence, the facility provided copies of letters sent with the contingency plan to local emergency response officials. The letters were each dated October 11, 2021 and contained a certified mail number. On December 7, 2021, through electronic communication, copies of the certified mail receipts were provided indicating the contingency plan and quick reference guide were sent to local emergency responders on November 23, 2021.

The quick reference guide appeared to include the eight required elements (per 40 CFR 262.262(b)); however, discrepancies were noted between the contingency plan and quick reference guide related to the type of hazardous waste generated onsite. During the closing interview, these discrepancies were brought to the attention of the facility. In the December 7, 2021 electronic communication, the facility provided a copy of the updated 8700-12FL notification form with all the applicable waste codes and an indication the contingency plan and quick reference guide would also be updated (and re-sent to local emergency responders).

Hazardous waste manifests were reviewed for 2019-2021. The provided manifests indicate hazardous waste removals from the site occurred twice in 2020 and three times in 2019 and 2021. According to reviewed manifests, EQ Industrial Services (MIK435642742), Freehold Cartage (NJD054126164), and AR Paquett (FLD982105884) are the registered transporters for hazardous wastes. The designated facilities are US Ecology Tampa (FLD981932494), and US Ecology Sulligent (ALD983177015). These manifests indicate waste removals ranging from 2,500 pounds to 12,000 pounds of F035 waste with arsenic and chromium in the descriptions, but no corresponding waste codes. The facility explained a designated facility had previously told them, they did not need to include all waste codes; however the facility was not familiar with the reason(s) for not needing to identify these codes. During the closing interview, we recommended the facility identify all applicable waste codes per 40 CFR 262.11(g). On December 13, 2021, Ms. Vest requested clarification on 40 CFR 268.9 regarding applicable waste codes related to treatment standards. Ms. Vest was provided with a copy 62-730.183 F.A.C. where 40 CFR 268 is adopted by reference and reminded of the initial generator responsibility for determining the applicable waste codes and applicable regulations for their waste generation.

Weekly inspections of the 90-day central accumulation area were provided for September 2021-present; additional weekly inspection records were requested for 2019 and 2020. Through electronic correspondence on November 30, 2021, the facility indicated daily and weekly inspections were conducted but written logs of inspections were not completed in 2019 and 2020.

The inspection records reference 40 CFR 265; as an LQG the facility is subject to weekly inspection requirements in 40 CFR 262.17(a)(1)(v) (as adopted in 62-730.160 F.A.C.). Per 62-730.160(3), generators who accumulate hazardous waste onsite under 40 CFR 262.17 are required to maintain written documentation of weekly inspections (for at least three years from the date of inspection) that at a minimum include: date and time of inspection, legibly printed name of inspector, number of containers, condition of containers, a notation of observations made, and the date and nature of any repairs or other remedial actions. The weekly inspection records provided do not contain number of containers or the date and nature of repairs or other remedial actions and weekly inspection records have not been maintained for three years. The weekly inspections were all conducted by the same individual, Tyler Powell.

In addition to the LQG requirements in 40 CFR 262, the facility is also subject to the requirements of 40 CFR 265 Subpart W for the drip pads (per 40 CFR 262.17(a)(3)). Per 40 CFR 265.443(i), the facility must document the date and time of each cleaning and the cleaning procedure used on the drip pads in the operating log; these records were not provided. Through the November 30, 2021 electronic correspondence, the facility again provided a cleaning procedure, and stated cleanings have not been formally documented. Per 40 CFR 265.444, the facility is also required to conduct inspections weekly and after storms of the drip pads; through the November 30, 2021 electronic correspondence, the facility indicated the drip pad is inspected daily as part of the normal work routine, but no records or logs are completed.

Trainings records were reviewed and appeared up to date for the individuals signing manifests, conducting weekly inspections, and the identified emergency coordinators. No issues were noted with the review of the training records. Job descriptions for the plant manager (Ryan Bruner) and the treatment plant operator (Tyler Powell) were provided with the November 30, 2021 electronic correspondence. The type and amount of training required for each position was not included in the job descriptions as required in 40 CFR 262.17(a)(7)(iv)(C).

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The drip pad assessments (per 40 CFR 265.441) provided for 2018 and 2019, appeared complete; however, no current assessment or 2020 assessment were provided. Through the November 30, 2021 electronic correspondence, the facility provided certified drip pad assessments for 2020 and 2021. According to the provided documents, the drip pads onsite appear certified through August 15, 2022.

On December 3, 2021, an exit meeting was conducted, via Teams (and call-in), with Ryan Bruner, Jammie Taylor, and Margarete Vest to discuss the inspection and request additional information. We discussed the areas visually inspected, universal waste regulations, safety equipment/'no smoking signs', containers on either end of treatment cylinder, contingency plan and quick reference guide content, discrepancies, and sharing, applicable waste codes, used oil generation, drip pad requirements/documentation, weekly inspection records, job descriptions, and the process moving forward. Additional documentation was requested related to the contingency plan being provided to local emergency response teams (provided in December 7, 2021 electronic communication).

### New Potential Violations and Areas of Concern:

#### Violations

Type:	Violation
Rule:	262.15(a)(4)
Question Number:	4.53
Question:	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)
Explanation:	The facility maintains a bin at each end of the treatment cylinder to catch sludge/dirt/debris as loads of wood are moved into or out of the cylinder (photo 1). The facility explained the bins are cleaned out as needed with the material placed directly into a drum and labeled as hazardous waste. These bins appear as the point of generation with the waste placed into an open, unlabeled container.
Corrective Action:	A container holding hazardous waste must be closed during accumulation except when adding, removing, consolidating, or venting (as necessary). The facility must use an appropriately labeled closeable container or immediately remove waste from the bin upon generation.

#### Photo Attachments:

Photo 1: Treatment Cylinder Bin with waste debris/sludge



## Apalachee Pole Co Inc Inspection Report

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Type:	Violation
Rule:	262.15(a)(5)
Question Number:	4.54
Question:	Has the generator marked satellite containers with the words "Hazardous Waste" AND an indication of the hazards of the contents? 262.15(a)(5)(i), 262.15(a)(5)(ii)
Explanation:	The bin(s) located on either end of the treatment cylinder to catch sludge/debris as wood is moved into and out of the cylinder did not appear labeled with 'hazardous waste' or an indication of the contents' hazards (photo 1).
Corrective Action:	Appropriately label all hazardous waste containers with the words: "Hazardous Waste" and an indication of the contents' hazards.
Type:	Violation
Rule:	262.17(a)
Question Number:	4.42
Question:	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.17(b)
Explanation:	Based on the documentation provided, it is not clear how the facility adhered to 90-day accumulation time limits per 40 CFR 262.17(a). Waste removals appear to have ranged between 62 days and 187 days with amounts ranging between 2,800lbs and 12,000lbs. The facility must provide documentation to indicate waste is not accumulated for more than 90-days or provide documentation to indicate waste amounts below large quantity generator thresholds were generated.
Corrective Action:	Provide documentation to indicate accumulation time limits were adhered to or to indicate time limits were not applicable.
Type:	Violation
Rule:	262.17(a)(3)
Explanation:	The facility had no documentation available to indicate waste is removed from the drip pad at least once every 90 days.
Corrective Action:	Ensure the requirements of 40 CFR 262.17(a)(3) are met for accumulation of hazardous waste on drip pads and maintain the required documentation readily available for inspection.
Type:	Violation
Rule:	262.17(a)(7)(i)(A)
Question Number:	4.78
Question:	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 262.17(a)(7)
Explanation:	The provided job descriptions did not describe the required training related to the hazardous waste management aspects of the position per 40 CFR 262.17(a)(7)(iv)(C).
Corrective Action:	Ensure personnel training and the associated required documentation meet all the requirements in 40 CFR 262.17(a)(7).
Type:	Violation
Rule:	262.261(a)
Question Number:	4.100
Question:	Explosions? 262.261(a)

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Explanation:	The provided contingency plan addresses actions facility personnel will take in response to fires and releases of hazardous waste but does not address explosions or how releases specifically to the air, soil, or surface water will be handled.
Corrective Action:	Update the contingency plan to include a description of the actions facility personnel must take to comply with 40 CFR 262.260 and 262.265 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.
Type:	Violation
Rule:	262.261(e)
Question Number:	4.106
Question:	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 262.261(e)
Explanation:	The contingency plan contains a list of emergency equipment and its general location but is lacking information related to physical descriptions and brief outlines of their capabilities
Corrective Action:	The contingency plan needs updated to include physical descriptions and brief outlines of the capabilities of each listed emergency equipment item.
Type:	Violation
Rule:	265.443(i)
Explanation:	The facility had no documentation to indicate the date and time of each cleaning and the cleaning procedure used on the drip pads. The facility provided a written cleaning procedure and an example form to be completed.
Corrective Action:	Ensure the facility is conducting the required activities related to the operation of the drip pads and maintain the appropriate documentation; specifically, per 40 CFR 265.443(i), the facility must document the date and time of each cleaning and the cleaning procedure used on the drip pads in the operating log.
Type:	Violation
Rule:	265.444(b)
Explanation:	The facility did not appear aware of the requirement to conduct weekly inspections (and after storms) of the drip pads per 40 CFR 264.444. Through the November 30, 2021 electronic correspondence, the facility indicated the drip pad is inspected daily as part of the normal work routine, but no records or logs are completed.
Corrective Action:	While the drip pad(s) are in operation, they must be inspected weekly and after storms to detect evidence of any of the following: deterioration, malfunctions or improper operation of run-on/run-off control systems; presence of leakage in and proper functioning of leakage detection system; deterioration or cracking of drip pad surface per 40 CFR 265.444(b).
Type:	Violation
Rule:	62-730.160(3)
Question Number:	4.63
Question:	Does the generator properly document the weekly inspections? 62-730.160(3)
Explanation:	Through electronic correspondence on November 30, 2021, the facility indicated daily and weekly inspections were conducted but written logs of inspections were not completed in 2019 and 2020. The provided weekly inspection logs of the 90-day container area do not contain number of containers or the date and nature of repairs or other remedial actions.
Corrective Action:	Per 62-730.160(3), generators who accumulate hazardous waste onsite under 40 CFR



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262.17 are required to maintain written documentation of weekly inspections (for at least three years from the date of inspection) that at a minimum include: date and time of inspection, legibly printed name of inspector, number of containers, condition of containers, a notation of observations made, and the date and nature of any repairs or other remedial actions. Update weekly inspection checklists for the 90-day central accumulation (containers) area to include all of the required elements.

**PHOTO ATTACHMENTS:**

Photo 2: SAA/aerosol can puncture unit and empty can accumulation



Photo 4: East Drip Pad



Photo 3: 'No Smoking' sign near ignitable waste generation



Photo 5: West Drip Pad



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Photo 6: 90-day Central Accumulation Area



**Conclusion:**

At the conclusion of this inspection, Apalachee Pole Company Inc. appeared to be out of compliance with the applicable state and federal hazardous waste regulations. Specifically, for open, un-labeled hazardous waste containers, contingency plan content, 90-day removal of waste (drip pad and central accumulation), documentation of weekly container and drip pad inspections, drip pad cleaning documentation, and job description content.

The facility must address each citation and review the applicable regulations to ensure compliance. While addressing the required content of the contingency plan, the facility is encouraged to also review the quick reference guide to ensure consistency between the documents.



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**4.0: Large Quantity Generator Checklist****Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	40 CFR 262 Subpart A - General Standards	Yes	No	N/A
4.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
4.2	Did the facility obtain an EPA ID Number prior to treating, storing, disposing, or transporting hazardous waste? 262.18(a)	✓		
4.3	Are any hazardous wastes treated or disposed of on site? 268.7(a)(5), 62-730.240(1)			
4.4	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5)			✓
Item No.	Land Disposal Restrictions	Yes	No	N/A
4.5	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
4.6	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5)			
4.7	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
4.8	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
4.9	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
4.10	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			✓
4.11	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			✓
4.12	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
4.13	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)	✓		
4.14	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			✓
4.15	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)	✓		
4.16	If the generator chooses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
4.17	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
4.18	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)	✓		

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4.19	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
4.20	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓
Item No.	The Manifest	Yes	No	N/A
4.21	<p>Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are not in compliance) 262.20(a)(1)</p> <p><input type="checkbox"/> Item 1. Generator's U.S. EPA Identification Number</p> <p><input type="checkbox"/> Item 2. Page 1 of "X" (total number of pages used to complete the manifest)</p> <p><input type="checkbox"/> Item 3. Emergency Response Phone Number</p> <p><input type="checkbox"/> Item 4. Manifest Tracking Number</p> <p><input type="checkbox"/> Item 5. Generator's Mailing Address, Phone Number and Site Address</p> <p><input type="checkbox"/> Item 6. Transporter 1 Company Name &amp; U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 7. Transporter 2 Company Name &amp; U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group.</p> <p><input type="checkbox"/> Item 10. Containers (Number and Type)</p> <p><input type="checkbox"/> Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates)</p> <p><input type="checkbox"/> Item 12. Units of Measure (Weight/Volume)</p> <p><input type="checkbox"/> Item 13. Waste Codes. Enter up to 6 of the most representative waste codes.</p> <p><input type="checkbox"/> Item 14. Special Handling Instructions and Additional Information</p> <p><input type="checkbox"/> Item 15. Generator's / Offeror's Certifications</p> <p><input type="checkbox"/> Item 16. International Shipments (Import or Export must be noted)</p> <p><input type="checkbox"/> Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt)</p> <p><input type="checkbox"/> Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility)</p> <p><input type="checkbox"/> Item 19. Hazardous Waste Report Management Codes (On returned copies only)</p> <p><input type="checkbox"/> Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)</p>	✓		
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✓		
4.23	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✓		
4.24	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✓		
4.25	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✓		
4.26	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23(c)			✓
4.27	<p>For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d)</p> <p><input type="checkbox"/> The next non-rail transporter?</p> <p><input type="checkbox"/> The Designated Facility if transported solely by rail?</p>			✓

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	<input type="checkbox"/> The last rail transporter to handle the waste in the U.S. if exported by rail?			
4.28	If the generator did not receive a signed return copy of the manifest from the designated facility within 35 days of shipment, did the generator contact the transporter and/or designated facility? 262.42(a)(1)			✓
4.29	If the generator did not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, did the generator file an exception report? 262.42(a)(2)			✓
4.30	If an exception report was submitted did it include a legible copy of manifest? 262.42(a)(2)(i)			✓
4.31	If an exception report was submitted did it include a cover letter signed by the generator explaining efforts taken to locate the waste and the results of those efforts? 262.42(a)(2)(ii)			✓
4.32	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
4.33	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
4.34	If YES, did the generator meet the requirements of 262.23(f)			✓
Item No.	Pre Transport Requirements	Yes	No	N/A
4.35	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
4.36	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓
4.37	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
4.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are not in compliance) 262.32(b) <input type="checkbox"/> Generator's Name and Address? <input type="checkbox"/> Generator's EPA ID Number? <input type="checkbox"/> Manifest Tracking Number?			✓
4.39	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	Accumulation Requirements	Yes	No	N/A
4.40	Does the facility accumulate hazardous waste on-site prior to treatment or disposal?			
4.41	If YES identify applicable accumulation units: <input checked="" type="checkbox"/> Containers - Complete Container Checklist also CC as applicable <input type="checkbox"/> Tanks - Complete Tanks Checklist also AA, BB, and CC, as applicable <input checked="" type="checkbox"/> Drip Pads - Complete Drip Pad Checklist <input type="checkbox"/> Containment Buildings - Complete Containment Buildings Checklist			
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.17(b)		✓	
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 262.17(b)			✓
4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 262.17(a)(8)(iii)? 262.17(a)(8)(iii)			✓
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.17(a)(5)(i)(C)	✓		
4.46	Has the generator ensured an indication of the hazards of the content is visible for inspection on each hazardous waste container? 262.17(a)(5)(i)(B)	✓		
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked	✓		

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	clearly with the words "Hazardous Waste"? 262.17(a)(5)(i)(A)			
4.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
4.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a)	✓		
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.15(a)	✓		
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.15(a)(1)	✓		
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.15(a)(2)	✓		
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)		✓	
4.54	Has the generator marked satellite containers with the words "Hazardous Waste" AND an indication of the hazards of the contents? 262.15(a)(5)(i), 262.15(a)(5)(ii)		✓	
4.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point? (If No, mark all items below as N/A.)			
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.17(a)(5)(i)(A)			✓
Item No.	Use and Management of Containers	Yes	No	N/A
4.58	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.17(a)(1)(ii)	✓		
4.59	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.17(a)(1)(iii)	✓		
4.60	Does the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.17(a)(1)(iv)(A)	✓		
4.61	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 262.17(a)(1)(iv)(B)	✓		
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.17(a)(1)(v)	✓		
4.63	Does the generator properly document the weekly inspections? 62-730.160(3)		✓	
4.64	This should include at a minimum: (Check items below that are not in compliance) <input type="checkbox"/> Date and Time of inspection <input type="checkbox"/> Legibly printed name of inspector <input checked="" type="checkbox"/> Number of hazardous waste containers <input type="checkbox"/> Condition of containers <input type="checkbox"/> Notation of observations made <input checked="" type="checkbox"/> Date and nature of any repairs or remedial actions			
4.65	Does the generator ensure ignitable and/or reactive wastes are not stored closer than 50 feet to the facility's property line? 262.17(a)(1)(vi)(A)	✓		
4.66	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 262.17(a)(1)(vii)(A)			✓
4.67	If the facility places hazardous waste in an unwashed container that previously held incompatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 262.17(a)(1)(vii)(B)			✓
4.68	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.17(a)(1)(vii)(C)			✓
Item No.	Personnel Training	Yes	No	N/A

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4.69	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 262.17(a)(7)(i)(A)	✓		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 262.17(a)(7)	✓		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 262.17(a)(7)	✓		
4.72	Is the training program designed to ensure facility personnel respond effectively to emergencies and did not fail to cover emergency procedures and equipment? 262.17(a)(7)	✓		
4.73	Does the generator conduct training within 6 months of hire or within 6 months of an employee moving to a new position that requires training? 262.17(a)(7)	✓		
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 262.17(a)(7)	✓		
4.75	Does the generator review training annually, at least once each calendar year? 262.17(a)(7)	✓		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 262.17(a)(7)	✓		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 262.17(a)(7)	✓		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 262.17(a)(7)		✓	
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 262.17(a)(7)	✓		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 262.17(a)(7)	✓		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 262.17(a)(7)	✓		
<b>Item No.</b>	<b>Preparedness and Prevention</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
4.82	Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? 262.251	✓		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 262.252(a)	✓		
4.84	Does the facility provide a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.252(b)	✓		
4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 262.252(c)	✓		
4.86	Does the facility provide and maintain water at adequate volume and pressure available to supply waterhose streams, foam producing equipment, automatic sprinklers, or water spray systems? 262.252(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 262.253	✓		
4.88	When hazardous waste is being handled, does the facility ensure all personnel involved have immediate access to an internal alarm or communication device? 262.254(a)	✓		
4.89	If only one employee is on premises while the facility is operating, does the facility ensure the employee has immediate access to a telephone or 2-way radio to summon external assistance? 262.254(b)	✓		
4.90	Does the facility maintain adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility in an emergency? 262.255	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 262.256(a)(2)	✓		
4.92	Where more than one police or fire department may respond, has the facility designated a	✓		

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	primary emergency police and/or fire authority? 262.256(a)(3)			
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 262.256(a)	✓		
4.94	Has the facility attempted to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries that could result? 262.256(a)	✓		
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 262.256(b)			✓
<b>Item No.</b>	<b>Contingency Plan and Emergency Procedures</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
4.96	Does the facility have a contingency plan? 262.260(a)	✓		
4.97	In the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents did the facility implement the contingency plan implemented immediately? 262.260(b)			✓
4.98	Does the contingency plan describe actions to be taken in response to the following:262.261(a)			
4.99	Fires? 262.261(a)	✓		
4.100	Explosions? 262.261(a)		✓	
4.101	Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? 262.261(a)			✓
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 262.261(b)			✓
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 262.261(c)	✓		
4.104	Does the plan list names and emergency phone numbers of emergency coordinator(s)? 262.261(d)	✓		
4.105	Does the plan identify the primary emergency coordinator and list alternates in order the they will assume responsibility? 262.261(d)	✓		
4.106	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 262.261(e)		✓	
4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 262.261(f)	✓		
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 262.262	✓		
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 262.262(a)	✓		
4.110	Has the facility updated the contingency plan with changes in emergency coordinators, facility design, construction, or operations, emergency equipment, plan failure in an emergency, or applicable regulations? 262.263	✓		
4.111	Has the facility designated an emergency coordinator either on premises or on call who is able to reach the facility in a short period of time and able to commit funds for incident response? 262.264	✓		
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 262.265? 262.265			✓
<b>Item No.</b>	<b>Record Keeping and Reporting</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
4.113	If the contingency plan has been implemented, did the owner or operator submit a written report to the Department within 15 days documenting the incident? 262.265(c)			✓
4.114	Does the generator keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for 3 years from the date the waste was last shipped off-site? 262.11(f)	✓		
4.115	Has the generator submitted a biennial report by March 1 of each even numbered year covering activities during the previous year? 262.41(a)	✓		

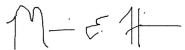
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4.116	Does the generator maintain a copy of the biennial report for at least 3 years from the due date of the report? 262.40(b)	✓		
4.117	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
4.118	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was intended to be shipped off-site? 262.83(b)			✓
4.119	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
4.120	If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83			✓

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**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Monica Hardin**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**12/21/2021**Date**Corinna Clanton**Inspector Name**Environmental Specialist**Inspector Title**DEP**Organization**Courtney Triplett**Inspector Name**Environmental Specialist**Inspector Title**DEP**Organization**Ryan Bruner**Representative Name**Plant Manager**Representative Title**Apalachee Pole Co.**Organization**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

**Report Approvers:****Approver:** Cliff Richardson**Inspection Approval Date:**12/21/2021