

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION: Facility Name: Ring Power Corp On-Site Inspection Start Date: 12/11/2024

ME ID#: 36366

On-Site Inspection End Date: 12/11/2024 **EPA ID#:** FLR000119123

Facility Street Address: 7500 26th Ct E, Sarasota, Florida 34243-4029Contact Mailing Address: 500 World Commerce Pkwy, Saint Augustine, Florida 32092-3788County Name: ManateeContact Phone: (904) 494-7480

NOTIFIED AS: SQG (100-1000 kg/month), Used Oil

WASTE ACTIVITIES:

Generator: SQG Used Oil: Oil Filters Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate: Batteries, Mercury Containing Lamps Maximum quantity of UW handled or transported at any time: Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: David Petti, Inspector Other Participants: Travis Anders, Service Manager

LATITUDE / LONGITUDE: Lat 27° 24' 19.2696" / Long 82° 31' 53.7092"

NAIC: 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

Ring Power, Sarasota (RPS), was inspected on December 12, 2024, by the Florida Department of Environmental Protection (Department) to determine the facility's compliance with state and federal hazardous waste regulations governing used oil transporters and small quantity generators (SQGs) of hazardous waste. According to Department databases the facility initially notified as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste in April 2005. RPS notified as a Small Quantity Generator Oil Filters, Used Oil Transporter & Transfer Facility, Small Quantity Handler, Universal Lamps in April 2010, and remains as such. In 2022 they re-notified as an SQG of hazardous waste.

This was the first inspection of this facility by the Department. No inspections have been performed by the Manatee County SQG program. The inspector was accompanied throughout the facility by Travis Anders, Service Manager, for the duration of the inspection.

Process Description:

RPS rents heavy equipment and services their rented equipment. The servicing can take place in their on-site maintenance shop or in the field. RPS also sells equipment parts to the general public. RPS operates out of one building that includes office space, maintenance shop and parts department. This facility currently has approximately 65 employees. The hours of operation are 7:00 AM – 5:00 PM Monday through Friday. Water and sewer service is provided by Manatee County Utilities.

RPS uses a combination of standard fluorescent & LED bulbs for indoor lighting. When servicing of the lighting system occurs it is accomplished by a third-party contractor who also removes spent bulbs from the site. As the fluorescent fixtures go dark they are replaced with the LED fixtures. Mr. Anders says it is possible there are no

more fluorescent bulbs in the facility now. The facility has two forklifts, one battery powered, and one propane powered. This equipment is serviced by a third-party contractor.

OFFICE SPACE

No hazardous or universal waste is generated or stored in this space.

PARTS DEPARTMENT

Universal waste spent lead-acid batteries are initially brought to the outside of the parts department and placed in open cardboard boxes on two pallets outside of a bay door. The wall above these batteries contains a sign that says, "Notice Universal Waste Batteries Designated Area." Eventually they are brought into the parts department and placed into larger cardboard boxes on pallets and sealed for shipment. At the time of the inspection there were two large, sealed cardboard boxes of spent batteries awaiting pick-up in the Parts Department. There was no tracking system in place to document how long the spent batteries have been onsite. The sealed boxes of spent batteries were not labeled as "Universal Waste - Battery(ies)," or "Waste Battery (ies)," or "Used Battery(ies)," per rule.

MAINTENANCE SHOP

On-site servicing/repair of heavy equipment occurs in the maintenance shop. This process generates used oil, used oil filters, used anti-freeze and paint waste. Used oil is changed out using various types of pans that are properly labeled with the words "Used Oil.". Once drained into the drain pans the used oil is transferred to a large, double walled containment tank that was properly labeled with the words "Used Oil filters are drained and placed into a large, closed bin on wheels, properly labeled with the words "Drained Used Oil Filters Only."

Used oil is picked up by Safety-Kleen Systems with the last pick up occurring on December 12, 2024, and quantified at 940 gallons. This facility ships out used oil about once per month. The facility provided three years of used oil receipts at the inspection.

Used antifreeze is drained the same way as the oil and pumped into a large double-walled containment tank labeled "Used Antifreeze." Used antifreeze is not picked up as frequently as used oil.

Some repairs require a small amount of painting to be completed. Spray paint cans are used. When the can is spent it is placed into a puncture device contraption (PDC) set atop an approximately 16-gallon metal drum. The punctured cans, punctured by the PDC, drain into the drum. The paint waste is handled as hazardous waste by the facility.

SAFTEY/SPILL CONTROL

RPS has a fire suppression sprinkler system and fire extinguishers strategically placed throughout the facility. They are certified annually. The fire alarm rings directly to the Fire Department. Employees are equipped with cell phones to summon help in an emergency if required. Emergency equipment is tested annually.

There are spill kits at both the bulk fuel and oil (new & used) tanks and strategically placed throughout the shop work areas. There are also boxes of PIG matts to contain small spills that occur during servicing of equipment.

SATTELITE ACCUMULATION AREA (SAA)

• SAA 1 is in the maintenance shop. This is where the paint waste is accumulated. A waste analysis performed on this waste showed it was hazardous and is treated as such. The container of paint waste was closed, in good condition and easy to access for inspection. However, the drum of paint waste was not labeled with the words "Hazardous Waste," nor did it contain an indication of the hazards of the contents (IOH).

This violation was corrected on December 20, 2024, when the facility provided the Department photo documentation that the paint waste container was now properly labeled with the words "Hazardous Waste," and an IOH.

CENTAL ACCUMULATION AREA (CAA)

RPS does not have a CAA. When the SAA container is nearing full Safety-Kleen Systems comes and picks it up directly from the SAA.

RECORDS (UOT)

Used Oil Acceptance Records: These records were not available during the inspection.

Used Oil Shipment Records: Three years of these records were provided during the inspection and appeared complete.

Universal Waste Batteries: Spent batteries are shipped out approximately every three weeks. The last shipment prior to inspection was November 8, 2024.

Registration and Notification: RPS failed to display a valid used oil registration form and identification number in a prominent location inside the facility. This violation was corrected on December 26, 2024, when they provided photo documentation to the Department, via email, that their used oil registration is now posted.

Documentation of Halogen Screening: The facility does not perform their own halogen screening. Safety-Kleen Systems provides them with this service. The facility obtained these records from Safety-Kleen Systems following the inspection and provided them to the Department.

RECORDS (SQG):

• Hazardous Waste Manifests: Hazardous waste manifests for the past three years were available for review at the facility at the time of the inspection. Based upon this review, the facility is shipping out hazardous waste on average every two years. The most recent shipment prior to the inspection was on August 13, 2024, for 50 pounds of paint waste (D001, D005, D006, D007, D008, D035). The facility was unable to produce the designated facility copy for this last shipment at the inspection. This violation was corrected on December 26, 2024, when the facility provided the Department, via email, with the missing document.

Transporters

- Safety-Kleen Systems, Inc [EPA ID # TXR000081205]
- Clean Harbors Environmental Services, Inc [EPA ID # MAD039322250]

Designated Facilities

- Clean Harbors Florida, LLC [EPA ID # FLD980729610]
- Land Disposal Restrictions: LDR notification records were available for review at the time of the inspection.

• Modified Contingency Plan: The plan was not posted as required where hazardous waste is generated and stored or by telephones.

• Arrangements With Required Entities: RPS failed to provide documentation of any attempt to make arrangements with the required entities during the inspection.

• Annual Hazardous Waste Training: Training records were not available for review at the time of the inspection.

• Weekly Inspection: Not required as the facility does not utilizes a CAA.

FACILTY STATUS

Based on the facility's disposal records, less than 100 kilograms of hazardous waste are generated monthly; as such, this facility is operating as an VSQG. However, the facility wants to maintain SQG status.

New Potential Violations and Areas of Concern:

Violations

Туре:	Violation
Rule:	262.15(a)(5)
Question Number:	3.54
Question:	Has the generator marked satellite containers with the words "Hazardous Waste"? 262.15(a)(5)
Explanation:	The facility's paint waste SAA container was not properly labeled with the words Hazardous Waste
	40 CFR 262.15(a)(5) states: A generator must mark or label its container with the the words "Hazardous Waste"
Corrective Action:	Corrected: On December 20, 2024 the facility provided the Department with photo documentation showing their SAA container is now properly labeled with the words Hazardous Waste.

Photo Attachments:

Paint waste container not properly labeled



Paint waste container now properly labeled



Ring Power Corp Inspection Report Inspection Date: 12/11/2024

Туре:	Violation
Rule:	262.16(b)(8)(vi)(A)
Question Number:	3.102
Question:	Has the facility made emergency response arrangements with the following: 262.16(b)(8) (vi)(A)
Explanation:	The facility failed to attempt to enter agreements with the required organizations.
Corrective Action:	40 CFR 262.16(b)(8)(vi)(A) states in part: The small quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements. As part of this coordination, the small quantity generator shall attempt to make arrangements, as necessary, to familiarize the above organizations with the layout of the facility, the properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes as well as the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. Within seven days of this notice the facility shall provide the Department with documentation showing they have attempted to enter the agreements with the required entities.
	Violation
Pule:	262 16(b)(9)(i)
Question Number:	3.58
Question:	Has the facility identified at least one employee to act as the Emergency Coordinator? 262.16(b)(9)(i)
Explanation:	The facility failed to designate at least one employee to act as the Emergency Coordinator.
	40 CFR 262.16(b)(9)(i) states in part: At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures.
Corrective Action:	Corrected: The facility provided photo documentation to the Department, via email, on December 26, 2024, that shows they now have a designated "Emergency Coordinator" and their 24 hour contact information is posted inside the facility.

Photo Attachments:

Inspection Date: 12/11/2024

Emergency coordinator



Type: Rule:	Violation 262.16(b)(9)(ii)
Question Number: Question:	Has the facility posted required emergency information next to a telephones or in areas directly involved in the generation and accumulation of hazardous waste? (Check items below that are NOT in compliance) 262.16(b)(9)(ii)
Explanation:	The facility failed to post the name and number of the emergency coordinator and the location of fire extinguishers and spill control material.
	40 CFR 262.16(b)(9)(ii) states in part: (ii) The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste: (A) The name and emergency telephone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material
Corrective Action:	Within seven days of this notice the facility shall provide the Department documentation that the modified contingency plan is now posted where required.
	Violation
Type:	Violation
Type: Rule: Question Number:	Violation 262.16(b)(9)(iii) 3.60
Type: Rule: Question Number: Question:	Violation 262.16(b)(9)(iii) 3.60 Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.16(b)(9)(iii)
Type: Rule: Question Number: Question: Explanation:	Violation 262.16(b)(9)(iii) 3.60 Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.16(b)(9)(iii) Training records were not available for review at the time of the inspection.
Type: Rule: Question Number: Question: Explanation:	Violation 262.16(b)(9)(iii) 3.60 Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.16(b)(9)(iii) Training records were not available for review at the time of the inspection. 40 CFR262.16(b)(9)(iii) states: The small quantity generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies;

Туре:	Violation
Rule:	262.40(a)
Question Number:	3.33
Question:	Did the generator maintain manifests for 3 years? 262.40(a)
Explanation:	The facility failed to provide the Designated Facility copy of one of their manifests.
	40 CFR 262.40(a) states: A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.
Corrective Action:	Corrected: This violation was corrected on December 26, 2024, when the facility provided the Department, via email, with the missing document.
	Violation
Type. Pulo:	273 14(2)
Explanation:	The facility failed to mark containers containing Universal Waste Batteries with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"
	40 CFR 273.14 states: Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"
Corrective Action:	Within seven days of this notice the facility shall provide the Department with documentagtion that shows the universal waste spent battery containers are now properly labeled and that the accumulation start date is being tracked on either a log or by dating the batteries.

Photo Attachments:

Spent batteries packaged for shipment missing proper labeling



Туре:	Violation
Rule:	62-710.500(4)
Explanation:	Facility failed to display a valid registration form and identification number in a prominent location inside the facility.
	62-710.500(4) states: Each registered person shall display the validated registration form and identification number in a prominent place at each facility location.
Corrective Action:	Corrected: The facility provided photo documentation to the Department, via email, on December 26, 2024, that their registration is now posted.

Photo Attachments: Registration posted



Type: Rule: Explanation:	Violation 62-710.510(1) The facility was unable to produce used oil acceptance records during the inspection.
	62-710.500 F.A.C. states in part: Each registered person shall maintain records that document (a) The name, business address, telephone number and EPA identification number of the transporter;
	 (b) The source of the used oil, including the name and street address of each source, and the EPA identification number of the source if the generator has one; (c) The total number of gallons of used oil received from each source, including any oily wastes which may be an integral part of the used oil shipment; (d) The type of used oil received, using the type code designation found in the form.
	(d) The type of used on received, using the type code designation found in the form instructions; (e) The date of receipt;
Corrective Action:	Within seven days of this notice the facility shall provide the Department with these records.

PHOTO ATTACHMENTS:

Inspection Date: 12/11/2024

Used oil drain pans



Used oil/used antifreeze tank



Used oil pump > tank



Conclusion:

At the time of the inspection Ring Power Sarasota was not operating in compliance with state and federal regulations govening used oil transporters and Small Quantity Generators of hazardous waste.

1.0: Pre-Inspection 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.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	1		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			~
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			~

3.0: Small 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
3.1	Has the facility properly identified all hazardous waste streams? 262.11	1		
3.2	Has the facility obtained an EPA ID number? 262.18(a)	1		
3.3	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? 262.18(c)	1		
3.4	Are any hazardous wastes treated or disposed of on site?			
3.5	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)			1
Item No.	Land Disposal Restrictions	Yes	No	N/A
3.6	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)			1
3.7	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)			
3.8	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)			1
3.9	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)			1
3.10	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)			1
3.11	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			1
3.12	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			1
3.13	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	1		
3.14	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)			√
3.15	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			1
3.16	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)			
3.17	If the generator choses 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)			

3.18	If the waste or contaminated soil met the treatment standards did the generator			 Image: A set of the set of the
	send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			
3.19	Did the generator retain on-site a copy of all notices, certifications, waste			1
	analysis data, and other documentation produced for at least 3 years from the			
	date the waste was last shipped? 268.7(a)(8)			
3.20	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
3.21	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)			1
3.22	Is the generator a small quantity generator (SQG) using a tolling agreement pursuant to 40 CFR 262.20(e)?			
3.23	Did the SQG comply with the applicable notification and certification			 Image: A set of the set of the
	requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(10)			
3.24	Has the SQG retained on-site a copy of the notification and certification, along			1
	with the tolling agreement, for at least 3 years after termination or expiration of the agreement? 268.7(a)(10)			
Item No.	The Manifest	Yes	No	N/A
3.25	Did the facility use a properly completed manifest for all its hazardous waste	1		
	shipments? (Check items below that are NOT in compliance) 262.20(a)(1)			
	Liters 2. Dans 4 of "V" (total number of names used to complete the manifest)			
	L Item 2. Page 1 of "X" (total number of pages used to complete the manifest)			
	L Item 3. Emergency Response Phone Number (must meet requirements			
	Item 4 Manifest Tracking Number			
	Litem 5. Generator's Mailing Address. Phone Number and Site Address			
	Litem 6. Transporter 1 Company Name & U.S. EPA ID Number			
	Litem 7. Transporter 2 Company Name & U.S. EPA ID Number			
	Litem 8 Designated Eacility Name Site Address Phone Number and U.S.			
	FPA ID Number			
	Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard			
	Class or Division, Identification Number and Packing Group.			
	Item 10. Containers (Number and Type)			
	☐ Item 11. Total Quantity (Round to nearest whole unit; container capacities are			
	not acceptable as estimates) Item 12. Units of Measure (Weight/Volume)			
	☐ Item 13. Waste Codes. Enter up to 6 of the most representative waste codes.			
	Item 14. Special Handling Instructions and Additional Information			
	Item 15. Generator's / Offeror's Certifications			
	Item 16. International Shipments (Import or Export must be noted)			
	☐ Item 17. Transporter's Acknowledgment of Receipt (printed name, signature,			
	date of receipt)			
	☐ Item 18. Discrepancy (Discrepancies between waste described on manifest			
	and waste received by facility)			
	(printed name, signature, date of receipt)			

3.26	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	1		
3.27	Did the generator sign the manifest certification by hand? 262.23(a)(1)	1		
3.28	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	1		
3.29	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)	1		
3.30	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)			~
3.31	 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) The next non-rail transporter? The Designated Facility if transported solely by rail? The last rail transporter to handle the waste in the U.S. if exported by rail? 			~
3.32	If the generator did not receive a signed return copy of the manifest from the designated facility within 60 days of shipment, did the generator file an exception report? 262.42(b)			1
3.33	Did the generator maintain manifests for 3 years? 262.40(a)		1	
3.34	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
3.35	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)			✓
Item No	Pre Transport Requirements	Yes	No	N/A
			1.10	1.07.
3.36	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			<i>✓</i>
3.36	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 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			✓ ✓
3.36 3.37 3.38	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 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 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)			✓ ✓ ✓
3.36 3.37 3.38 3.39	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 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 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) 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) 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) 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) Generator's Name and Address? Generator's EPA ID Number? Manifest Tracking Number?			✓ ✓ ✓ ✓
3.36 3.37 3.38 3.39 3.40	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 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 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) 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) 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) Generator's EPA ID Number? Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			
3.36 3.37 3.38 3.39 3.40 Item No.	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 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 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) 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) 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) Generator's Name and Address? Generator's EPA ID Number? Manifest Tracking Number? Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33	Yes	No	✓ ✓ ✓ ✓ ✓ ✓
3.36 3.37 3.38 3.39 3.40 Item No. 3.41	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 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 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) 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) 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) Generator's Name and Address? Generator's EPA ID Number? Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33 Accumulation Requirements Does the facility accumulate hazardous waste on-site prior to treatment or disposal? 262.16	Yes	No	✓ ✓ ✓ ✓ ✓ N/A
3.36 3.37 3.38 3.39 3.40 Item No. 3.41 3.42	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 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 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) 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) 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) Generator's Name and Address? Generator's EPA ID Number? Manifest Tracking Number? Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33 Accumulation Requirements Does the facility accumulate hazardous waste on-site prior to treatment or disposal? 262.16 Check the applicable accumulation unit if the facility accumulates hazardous waste on-site prior to treatment or disposal Containers - Complete Container Checklist below Tanks - Complete Tanks Checklist below	Yes	No	✓ ✓ ✓ ✓ ✓ N/A

3.44	If NO, has the facility been issued an extension by the Department? 262.16(d)			1
3.45	Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? 262.16(b)(1)	1		
3.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.16(b)(6)(i)(C)			1
3.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.16(b)(6)(i)(A)			1
3.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
3.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a)	1		
3.50	Are satellite containers under the control of the operator of the process generating the waste? 262.15(a)	1		
3.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.15(a)(1)	1		
3.52	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)	1		
3.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)	1		
3.54	Has the generator marked satellite containers with the words "Hazardous Waste"? 262.15(a)(5)		1	
3.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point?			
3.56	If YES, after 3 days did the generator mark or label an accumulation start date on the excess waste containers ? 262.15(a)(6)			√
Item No.	Emergency Information/Personnel Training	Yes	No	N/A
3.58	Has the facility identified at least one employee to act as the Emergency Coordinator? 262.16(b)(9)(i)		1	
3.59	Has the facility posted required emergency information next to a telephones or in areas directly involved in the generation and accumulation of hazardous waste? (Check items below that are NOT in compliance) 262.16(b)(9)(ii)		1	
	Location of fire extinguishers and spill control material, and, if present, fire alarm			
	alarm (911 is acceptable)			
3.60	Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.16(b)(9)(iii)			
3.61	Has the facility had to respond to any emergencies in the past 3 years?			
3.62	If YES, did the facility respond in a manner described below, or other appropriate manner? (Check items below that are NOT in compliance) 262.16(b)(9)(iv) FIRE - Call fire department or attempt to extinguish with a fire extinguisher			
	 SPILL - Contain the waste and clean up any hazardous waste and contaminated materials and soil FIRE, EXPLOSION, or RELEASE that posed threat - Notify the State Watch 			
14	Office and National Response Center and report	N	NL	NI/A
Item No.		Yes	NO	N/A
3.63	Does the generator use hazardous waste containers that are in good condition?			

3.64	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.16(b)(2) (ii)			
3.65	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.16(b)(2)(iii)(A)	1		
3.66	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? 262.16(b)(2)(iii)(B)	1		
3.67	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.16(b)(2)(iv)			
3.68	Does the generator properly document the weekly inspections? This should include at a minimum:(Check items below that are NOT in compliance) 62- 730.160(3) Date and Time of inspection Legibly printed name of inspector Number of hazardous waste containers Condition of containers Notation of observations made			~
3.69	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 262.16(b)(2)(v)(A)? 262.16(b)(2)(v)(A)			1
3.70	If the facility places hazardous waste in an unwashed container that previously held incomplatible wastes or materials, is it done in compliance with 40 CFR			1
	262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B)			
3.71	262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C)			1
3.71 Item No.	262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B)Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)?262.16(b)(2)(v)(C)Tanks Requirements for SQGs	Yes	No	✓ N/A
3.71 Item No. 3.72	262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B)Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C)Tanks Requirements for SQGsDoes the facility treat or store hazardous waste in tanks?	Yes	No	✓ N/A
3.71 Item No. 3.72 3.73	262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) Tanks Requirements for SQGs Does the facility treat or store hazardous waste in tanks? If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A)	Yes	No	✓ N/A ✓
3.71 Item No. 3.72 3.73 3.74	 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) Tanks Requirements for SQGs Does the facility treat or store hazardous waste in tanks? If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A) Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B) 	Yes	No	✓ N/A ✓ ✓
3.71 Item No. 3.72 3.73 3.74 3.75	 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) Tanks Requirements for SQGs Does the facility treat or store hazardous waste in tanks? If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A) Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B) Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C) 	Yes	No No	✓ N/A ✓ ✓ ✓
3.71 Item No. 3.72 3.73 3.74 3.75 3.76	 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) Tanks Requirements for SQGs Does the facility treat or store hazardous waste in tanks? If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A) Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B) Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C) If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii)(D) 	Yes	No	✓ N/A ✓ ✓ ✓
3.71 Item No. 3.72 3.73 3.74 3.75 3.75 3.76 3.77	262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) Tanks Requirements for SQGs Does the facility treat or store hazardous waste in tanks? If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A) Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B) Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C) If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii) (D) Does the facility inspect, where present, the following at least once each operating day:	Yes	No	✓ N/A ✓ ✓ ✓
3.71 Item No. 3.72 3.73 3.74 3.75 3.75 3.76 3.77 3.78	 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) Tanks Requirements for SQGs Does the facility treat or store hazardous waste in tanks? If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A) Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B) Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C) If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii) (D) Does the facility inspect, where present, the following at least once each operating day: Discharge Control Equipment (waste feed cut-off, by-pass, and drainage systems)? 262.16(b)(3)(iii)(A) 	Yes	No	✓ N/A ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓
3.71 Item No. 3.72 3.73 3.74 3.75 3.76 3.77 3.78 3.79	 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) Tanks Requirements for SQGs Does the facility treat or store hazardous waste in tanks? If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A) Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B) Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C) If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii) (D) Does the facility inspect, where present, the following at least once each operating day: Discharge Control Equipment (waste feed cut-off, by-pass, and drainage systems)? 262.16(b)(3)(iii)(A) Data gathered from monitoring equipment (e.g., pressure and temperature gauges)? 262.16(b)(3)(iii)(B) 	Yes	No	✓ N/A ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓
3.71 Item No. 3.72 3.73 3.74 3.74 3.75 3.76 3.76 3.77 3.78 3.79 3.80	 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) Tanks Requirements for SQGs Does the facility treat or store hazardous waste in tanks? If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A) Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B) Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C) If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii)(D) Does the facility inspect, where present, the following at least once each operating day: Discharge Control Equipment (waste feed cut-off, by-pass, and drainage systems)? 262.16(b)(3)(iii)(A) Data gathered from monitoring equipment (e.g., pressure and temperature gauges)? 262.16(b)(3)(iii)(B) The level of waste in the tank? 262.16(b)(3)(iii)(C) 	Yes	No	 ✓ N/A ✓

3.82	The construction materials of the tank to detect corrosion or leaking of fixtures or seams? 262.16(b)(3)(iii)(D)			~
3.83	The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes) to detect erosion or obvious signs or leakage? 262.16(b)(3)(iii)(E)			1
3.84	Does the facility accumulate waste in tanks or tank systems that have full secondary containment and either leak detection equipment to alert facility personnel to leaks or established workplace practices to ensure leaks are promptly identified?			
3.85	If YES, does the facility inspect Discharge Control Equipment, Data, and Level of waste in tanks at least weekly? 262.16(b)(3)(iv)			~
3.86	Is the use of the alternate inspection schedule (weekly versus daily) documented in the facility's operating record? 262.16(b)(3)(iv)			1
3.87	Does the documentation include a description of the established workplace practices at the facility? 262.16(b)(3)(iv)			1
3.88	Upon closure of the facility, was all hazardous waste removed from tanks, discharge control equipment, and confinement structures? 262.16(b)(3)(vi)			1
3.89	Does the facility manage ignitable or reactive waste in tanks?			
3.90	 If YES, does the facility meet one of the following 3 conditions? (Check the condition that applies below) 262.16(b)(3)(vii)(A) If ignitable or reactive waste is placed in a tank is the waste treated, rendered, or mixed before or immediately after placement in the tank so that (A) the resulting mixture no longer meets the definition of ignitable or reactive waste and (B) the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc are met? If ignitable or reactive waste is placed in a tank is the waste treated or stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? If ignitable or reactive waste is placed in a tank is the tank used solely for emergencies? 			
	the facility comply with the buffer zone requirements for tanks contained in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? 262.16(b)(3)(vii)(B)			
3.92	If incompatible wastes or incompatible waste and materials are placed in the same tank does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc are met? 262.16(b)(3)(vii)(C)(1)			~
3.93	If hazardous waste is placed in an unwashed tank which previously held an incompatible waste or material does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc are met? 262.16(b)(3)(vii)(C)(2)			<i>✓</i>
Item No.	Preparedness and Prevention	Yes	No	N/A
3.94	Is there no evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? 262.16(b)(8)(i)	1		
3.95	Does the facility have an internal communication or alarm system? 262.16(b)(8) (ii)(A)	✓		
3.96	Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.16 (b)(8)(ii)(B)			

3.97	7 Is the fire control equipment adequate? 262.16(b)(8)(ii)(C)			
3.98	Is spill control and decontamination equipment present? 262.16(b)(8)(ii)(C)			
3.99	If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? 262.16 (b)(8)(ii)(D)	1		
3.100	Is the emergency equipment inspected and tested periodically? 262.16(b)(8)(iii) If yes, how many times per year?262.16(b)(8)(v)	1		
3.101	Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? 262.16(b)(8)(v)	1		
3.102	Has the facility made emergency response arrangements with the following: 262.16(b)(8)(vi)(A) Fire Department Police Hospital Emergency Response Contractor		1	
3.103	If NO has the facility attempted to do so and is the refusal documented? 262.16 (b)(8)(vi)(B)			1
Item No.	Record keeping and Reporting	Yes	No	N/A
3.104	Is the generator keeping records of exception reports? 262.42(b)			 ✓
3.105	Is the generator keeping records of test results, waste analysis or other determinations made in accordance with 262.11? 262.11(f)			1
3.106	Are the records kept on-site? 262.40			 ✓
3.107	Are records kept for a minimum of 3 years? 262.40			1
3.108	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
3.109	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)			1
3.110	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
3.111	If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83			 ✓

6.0: Transporters 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.	D. Transporter Requirements		No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	1		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			1
6.4	6.4 Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards?263.10(c)Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			1
6.6				
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) Exemption Type - Tolling Agreement Exemption Type - VSQG Bill-of-Lading			√
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)			1
6.9	 6.9 Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b) 6.10 Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c) 			1
6.10				1
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)			√
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)			1
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)			1
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)			
Item No.	Rail Transporters	Yes	No	N/A

6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			1
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			1
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			~
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20 (f)(2)			~
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f) (3)(i)			1
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			1
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			~
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e) (3)			~
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			1
Item No.	. SQG Waste		No	N/A
6.27	For SOG waste, if a manifest is not used is the waste being transported pursuant		1.10	
	to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓ ✓
6.28	to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1) Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) Name, address, and EPA identification number of the generator of the waste Quantity of waste accepted All DOT-required shipping information The date the waste is accepted			<i>·</i>
6.28	to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1) Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) Name, address, and EPA identification number of the generator of the waste Quantity of waste accepted All DOT-required shipping information The date the waste is accepted Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓ ✓ ✓
6.28 6.29 6.30	to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1) Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) Name, address, and EPA identification number of the generator of the waste Quantity of waste accepted All DOT-required shipping information The date the waste is accepted Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3) Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			> > > >
6.28 6.29 6.30 6.31	 Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) Name, address, and EPA identification number of the generator of the waste Quantity of waste accepted All DOT-required shipping information The date the waste is accepted Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3) Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4) If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1) 			

6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31		1
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)		1
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)		1

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

David Petti	Inspector		
Principal Investigator Name	Principal Investigator Title		
Partetti			
	DEP	01/03/2025	
Principal Investigator Signature	Organization	Date	
Travis Anders	Service Mana	ger	
Representative Name	Representati	ve Title	
	Ring Power		
	Organization	1	

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: Michael Miller

Inspection Approval Date:

01/06/2025