



Department of Environmental Protection

Haz. Waste Transporter

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION EXIT INTERVIEW

FACILITY: BAY LINE RAILWAY LLC

EPA IDENTIFICATION NUMBER: FLD 984 229 906 DATE: 9/27/04 TIME: 3:33 pm

INTERVIEW PARTICIPANTS: JERRY HOWE - Bay Line - General Mgr. / Roger Leonard - Dispatcher
Thomas D. Hall - FDEP

This exit interview is the Department's attempt to advise you early in the process of possible violations of Florida Administrative Code Chapter 62-730, which adopts Title 40 Code of Federal Regulations Parts 260-266 by reference. It is possible that the list of violations noted (checked) is incomplete. After a complete internal file review by the Department an inspection report will be finalized. In most cases, the violations noted by the inspector will not change in the final report, therefore, you are advised to immediately begin correcting these deficiencies noted below. Please also be aware that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties when violations, such as these, are noted. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

- 1. Hazardous Waste Determination [262.11].
- 2. Notification as a generator [262.12].
- 3. Manifest Deficiencies [262 Subpart B].
- 4. Recordkeeping [test results, manifest, biennial report].
- 5. Personnel Training [265.16; 262.34(d)].
- 6. Contingency Plan [265 Subpart D; 262.34(d)(5)].
- 7. Preparedness and prevention [265 Subpart C; 262.34(d)(4)].
- 8. Container Requirements [265 Subpart I; 262.34(d)(2)].
- 9. Tank requirements [265 Subpart J].
- 10. Exceeding accumulation storage time [262.34(a); 262.34(d)].
- 11. Accumulation start date & labels on containers [262.34(a)(2)&(3)].
- 12. Accumulating >1000 kg without meeting SQG standards [261.5].
- 13. Not ensuring delivery of HW to a proper TSD facility [261.5].
- 14. Notification as a TSD facility [264.11].
- 15. Treatment, storage or disposal without a permit [F.A.C. 17-730].
- 16. Ground water monitoring [265 Subpart F].
- 17. Security Requirements [265.14].
- 18. Storing HW less than 50 feet from the property line [265.176].
- 19. "No Smoking" signs, ignitable/reactive requirements [265.17].
- 20. Closure/Post-closure [265 Subpart G].
- 21. Financial Responsibility [264 Subpart H].
- 22. Failure to comply with the provisions of a Department Issued Permit or with the provisions of the Consent Order.
- 23. Other:

COMMENTS: No deficiencies observed. State of FL. HW trans. paperwork subm. Htd Mar 9, 2004 and return paperwork not yet received from DEP. Tax out of insurance on receipt mg
Jerry J. Howe RECEIPT ACKNOWLEDGED BY
Thomas D. Hall INVESTIGATOR

**Signing this form does not serve as admission that the violation occurred, only that the form has been received and discussed.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"