

## INSPECTION FORM

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MICHAEL HECK (7-0532)

COMPLIANCE INSPECTION SECTION

Rm 204

NEW YORK STATE

INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT

(Chapter 639, Laws of 1978)

RECEIVED

Prepared for:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
Henry G. Williams, CommissionerDivision of Solid and Hazardous Waste  
Norman H. Nosenchuck, DirectorSend to: Compliance Inspection Section  
50 Wolf Road - Room 207/415  
Albany, New York 12233-0001BUREAU OF  
HAZARDOUS WASTE OPERATIONS  
DIVISION OF SOLID AND  
HAZARDOUS WASTE

JUL 19 1985

CLOSED

EPA I.D. NUMBER: NY D 037056132  
NYT 000603894\*HANDLER'S NAME (Corporate): Hazardous Waste Disposal Inc.  
(Division): \_\_\_\_\_\*HANDLER'S MAILING ADDRESS: 11A Picone Blvd.City & State Farmingdale, NY Zip Code 11735  
\*HANDLER'S LOCATION ADDRESS:  
(if different than mailing)City & State \_\_\_\_\_ Zip Code \_\_\_\_\_  
\*HANDLER'S TELEPHONE NUMBER: (\_\_\_\_) \_\_\_\_\_ Extension \_\_\_\_\_\*FULL NAME OF HANDLER'S CONTACT: (MR.) (Ms.) GEORGE LAWRENCE\*TITLE OF HANDLER'S CONTACT: PRESIDENT\*HANDLER'S CONTACT ADDRESS:  
(if different than Handler's)City & State \_\_\_\_\_ Zip Code \_\_\_\_\_  
\*HANDLER'S CONTACT TELEPHONE NUMBER: (\_\_\_\_) \_\_\_\_\_ Extension \_\_\_\_\_  
(if different than Handler's)INSPECTION DATE: 06/25/85 TIME OF INSPECTION: 2:30 a.m.  
p.m.COUNTY: SUFFOLK E/A NUMBER: 47 20 00INSPECTOR'S NAME: ROBERT FREYTITLE: INSPECTOR

NAME: \_\_\_\_\_

TITLE: \_\_\_\_\_

CHECK ONE: Copy of THIS report (\_\_\_\_ has) (X has not) been given to the Handler.REPORT PREPARED BY: ROBERT FREY DATE: 06/27/85REPORT APPROVED BY: Wendy M. Sanford DATE: 7-15-85

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\* For the purpose of this Inspection Report - HANDLER means a hazardous waste Generator, Transporter, or Treatment, Storage or Disposal Facility (TSDF).

New York State Department of Environmental Conservation  
Division of Solid and Hazardous Waste  
50 Wolf Road, Albany, New York 12233

PART I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 366

Yes      No

A. Is there reason to believe the facility has hazardous waste on-site? If yes, what leads you to believe it is hazardous waste? Check appropriate box/boxes and attach any applicable correspondence with DEC or EPA:

\_\_\_\_\_ ☒

(1) \_\_\_\_\_ Company recognizes that its waste is hazardous during the inspection.

(2) \_\_\_\_\_ Company admitted the waste is hazardous in its RCRA notification and/or Part A permit application.

(3) \_\_\_\_\_ EPA testing (SWA-46) has shown characteristics of:  
(    ) ignitability - 366.3(b);  
(    ) corrosivity - 366.3(c);  
(    ) reactivity - 366.3(d);  
(    ) EP toxicity - 366.3(e)

\_\_\_\_\_ Has revealed hazardous constituents (please attach analysis report) 366.4(a)2 (261 Appendix VIII)

(4) \_\_\_\_\_ The material is listed in the regulations as a hazardous waste from non-specific sources 366.4b.

(5) \_\_\_\_\_ The waste material is listed in the regulations as a hazardous waste from specific sources. 366.4c.

(6) \_\_\_\_\_ The material or product is listed in the regulations as discarded commercial chemical products, off-specification species, containers residues and spill residues thereof. 366.4d.

(7) \_\_\_\_\_ Company is unsure, but they have reason to believe that waste materials are hazardous. (Explain) \_\_\_\_\_

(8) \_\_\_\_\_ If don't know, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Is there reason, other than those above, for you to believe that there are hazardous waste on site? (Explain) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

C. What other environmental permits are held by the company, relative to hazardous waste management?

\_\_\_\_\_ SPDES Permit Number \_\_\_\_\_ Air Permit Number

\_\_\_\_\_ Part 364 Industrial Waste Transporter Permit (indicate this company's permit number if any)

Please describe other relevant (if any) permits and give the name, address, Part 364 Permit Number and EPA I.D. Number of transporter(s) used by company.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

D. If the facility is a treatment, storage or disposal facility, have they:

\_\_\_\_\_ Submitted a Part A application. \_\_\_\_\_ Have changes been made that are not reflected in the Part A application? Should the Part A be modified by the Company? \_\_\_\_\_ If so, explain.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_ Submitted a Part B application.

\_\_\_\_\_ Been granted a Part 360 permit.

If so, when does it expire: \_\_\_\_\_  
Please attach or explain any special conditions or variances -  
360.1(g) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_ Been granted a hazardous waste Part B permit.

If so, also complete the facility Part B (Part 360) permitted inspection report - Appendix K.

- E. Describe the activities that result in the generation of hazardous waste. Include the company's manufacturing processes. \_\_\_\_\_

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- F. Identify the hazardous wastes that are on-site and the quantity of each (use the identification numbers referred to in Part 366). \_\_\_\_\_

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- G. The handler notified EPA as a:

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Has EPA or DEC officially modified the handlers status? If so, attach correspondence. \_\_\_\_\_

\_\_\_\_\_

2. Status Identification:

This handler should be inspected as a (check each appropriate category after considering exemptions)

A. \_\_\_\_\_ Transporter - complete Appendix B

B. Generator Status Identification 365.1

1. \_\_\_\_\_ Category 1 generator - small quantity generator - generates less than 100 kg/mo and stores less than 100 kg. - 365.1(e)(1)i - Complete Part II, 1B.
2. \_\_\_\_\_ Category 2 generator - small quantity generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. - 365.1(e)(1)ii - Complete Part II, 1C.
3. \_\_\_\_\_ Category 3 generator - small quantity generator - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg. - 365.1(e)(1)iii - Complete Part II, 1C and 1D.
4. \_\_\_\_\_ Category 4 generator - small quantity generator as set forth in 365.1(e)(1)iv Below - Complete Part II, 1B.
  - (a) \_\_\_\_\_ A total of one kilogram of all commercial product or manufacturing chemical intermediate having the generic name listed in paragraph 366.4(d)5.
  - (b) \_\_\_\_\_ A total of one kilogram of any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraph 366.4(d)5.
  - (c) \_\_\_\_\_ Any containers identified in paragraph 366.4 (d)(3) of this title that are larger than 20 liters in capacity.
  - (d) \_\_\_\_\_ A total of 10 kilograms of inner liner from containers identified in paragraph 366.4 (d)(3) of this title.
  - (e) \_\_\_\_\_ One hundred (100) kilograms of any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph 366.4 (d) 5 of this title.

5. \_\_\_\_ Category 5 generator - generated 1,000 kilograms or more per month - Complete Part II.
6. \_\_\_\_ Category 6 generator - stores 1,000 kilograms or more - Complete Part II.

C. Treatment, Storage or Disposal Facility Status

On-site accumulation of hazardous waste prior to shipment - 365.2 (a)7

1. Is hazardous waste generated and stored on-site? If so:
  - (a) \_\_\_\_ Has hazardous waste been stored on-site longer than 90 days? 365.2 (a)(7)(i) - If yes, complete Appendix A.
  - (b) \_\_\_\_ Has more than 8,800 gallons of hazardous waste been stored in containers? 365.2 (a)(7)(i) - If yes, complete Appendix A.
  - (c) \_\_\_\_ Has more than 20,000 gallons of hazardous waste been stored in tanks? 365.3 (a)(7)(i) - If yes, complete Appendix A.
2. \_\_\_\_ Hazardous waste received from off-site and not beneficially used, reused or legitimately recycled or stored. If yes, complete Appendix A.
3. \_\_\_\_ Hazardous waste is treated on-site. 360.1(b)
4. \_\_\_\_ Hazardous waste is disposed of on-site. 360.1(b)

3. Exemptions

If the handler is inspected other than as they notified (e.g., notified as generator/TSD - inspected as exempt generator) a full explanation should be included in Part III.

A. Generator Exemptions

- (1) \_\_\_\_ Not a regulated handler (be sure to indicate why in Part I 1F and 1G and/or in appropriate exemption below - for example the company notified for precautionary reasons or the waste generated is not hazardous as specified in 366.1(g)(2).
- (2) \_\_\_\_ Delisted hazardous waste 366.4-366.6 IDENTIFY the waste that was delisted: (If the company is in the delisting process they are still regulated until their delisting petition is favorably approved) Complete appropriate parts depending on company status.

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- (3) \_\_\_\_\_ Exemption for used engine lubricating oil. 365.1(e)2 - Complete Part II, 1B.
- (4) \_\_\_\_\_ Exemption for farmers. 365.1(e)(3). Only if he triple rinses each emptied pesticide container in accordance with paragraph 365.1(e)(3)i or 365.1(e)(3)ii, and disposes of the pesticide residues on his own farm in a manner consistent with Section 325.4(d) of this title or in a manner consistent with the disposal instructions on the pesticide label, whichever is more restrictive.
- (5) \_\_\_\_\_ Exemption for publicly owned treatment works 365.1(e)4.
- (6) \_\_\_\_\_ Samples shipped to laboratories solely for analysis. 365.1(e)5.
- (7) \_\_\_\_\_ Residues of hazardous waste in empty containers. 365.1(e)6.
- (8) \_\_\_\_\_ A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials. 365.1(e)7.
- (9) \_\_\_\_\_ Mixed with non-hazardous waste is exempt only if, unregulated quantity is mixed and the resulting mixture does not fail a characteristic test - 365.1(e)(v).

#### B. TSD Exemptions

- 1. TSD exemptions - 360.1 (f) 2 (for facilities and operations that manage hazardous waste other than waste oil)
  - (a) \_\_\_\_\_ The disposal of waste pesticides on a farm by the farmer who generated them if the container or inner liner has been triple rinsed or the inner liner has been removed and the disposal method is proper - 360.1 (f)(2)(i); 365.1 (e)(3).
  - (b) \_\_\_\_\_ Storage of characteristic hazardous waste prior to its beneficial use or reuse or legitimate recycling or reclamation - if the hazardous waste is not a sludge, the facility processes a valid EPA identification number, and such storage occurs off-site of the waste's generation. 360.1 (f)(2)(iv) - If yes, complete Part II, 2, 3C, 3D.
  - (c) \_\_\_\_\_ Beneficial use or reuse or legitimate recycling or reclamation of hazardous waste provided that if such management occurs off-site of the waste's generation, the management is of



neither listed hazardous waste nor sludge, the facility processes a valid EPA identification number, and if the facility recovers energy from the waste, complies with Part 201 (air permit).

- (d) \_\_\_\_\_ The treatment of hazardous waste prior to its beneficial use or reuse or legitimate recycling or reclamation if the treatment is of neither listed hazardous waste nor sludge and the facility possesses a valid EPA identification number. 360.1 (f)(2)(vi).

2. TSD exemptions - 360.1 (f)(3) (for facilities and operations that manage waste oils)

- (a) \_\_\_\_\_ Storage or treatment of waste oil generated on-site prior to its beneficial use or reuse or legitimate recycling or reclamation if the waste oil is not a listed hazardous waste, and the waste oil is not a hazardous sludge. 360.1 (f)(3)(iii). (Check for prevention of spills and discharges to storm and sanitary sewers.)
- (b) \_\_\_\_\_ Exemptions for storage of waste oil at an energy recovery facility prior to its on-site combustion of such waste oils are not listed hazardous wastes, waste oils are not hazardous sludges, and the facility stored less than 80,000 gallons of waste oil. 360.1 (f)(3)(iv). (Check for prevention of spills and discharges to storm and sanitary sewers.)
- (c) \_\_\_\_\_ Combustion units that recover energy from waste oil, other than listed hazardous waste and sludges and the related treatment on-site of such combustion units if the facility complies with their air permit and if the facility manages waste oil which is a characteristic hazardous waste generated off-site, and it possesses a valid EPA identification number. 360.1 (f)(3)(v)

3. TSD exemptions - 360.1 (f)(2) and 360.1 (f) 3 (for facilities and operations that manage hazardous waste or waste oils).

- (a) \_\_\_\_\_ Storage of hazardous waste generated and stored on-site for 90 days or less and 8,800 gallons or less is stored in containers or 20,000 gallons or less is stored in tanks. The facility can not be located in a geographical area overlying a sole source aquifer. 360.1 (f)(2)(ii) - If yes, complete Part II, 2A, 3C, 3D.
- (b) \_\_\_\_\_ Storage or treatment of hazardous waste on-site of generation if generated and stored less than 1,000 kilograms of hazardous waste in each calendar month and do not generate or store acute hazardous waste as described in 365.1 (e)(1)(iv). - 360.1 (f)(2)(iii).
- (c) \_\_\_\_\_ Totally enclosed treatment facility for hazardous waste if totally enclosed treatment facility is directly connected to an industrial production process and the process is

constructed and operated in a manner which prevents the release of any hazardous waste or constituent thereof into the environment during treatment. 360.1 (f)(2)(viii) and 360.1 (f)(3).

- (d) ☐ Elementary neutralization unit or wastewater treatment unit if owned or operated by a generator and treating only waste generated on-site - 360.1 (f)(2)(viii) and 360.1 (f)(3) - if yes, complete Part II 2A, 2B, 3C and 3D.

#### 4. Environmental Facilities Corporation (EFC) Survey

The following questions are voluntary:

The Environmental Facilities Corporation (EFC) is actively involved in the industrial materials recycling program, and these questions will assist EFC in carrying out this program. It may also be beneficial to the facility being inspected in that acceptable markets or more economical alternatives to the facility's current disposal techniques may be brought to their attention.

- A. Does the company believe their hazardous waste has the potential for recovery, reclamation or exchange with other companies to minimize disposal costs? ☐ Yes ☐ No ☐ Don't Know

If yes:

- B. Does the company wish to list their waste stream in the Northeast Industrial Waste Exchange Listings Catalog? ☐ Yes ☐ No ☐ Don't Know
- C. Does the company want to receive additional information about the potential for waste exchange? ☐ Yes ☐ No ☐ Don't Know
- D. Does the company wish to obtain assistance from the New York State Environmental Facilities Corporation to assess the potential for recovery, reclamation or exchange of the hazardous waste stream? ☐ Yes ☐ No ☐ Don't Know

The Company representative may wish to contact Mr. Pickett Simpson, Hazardous Waste Program Manager, Environmental Facilities Corporation, 50 Wolf Road, Room 527, Albany, New York 12233 at (518) 457-4138.

New York State Department of Environmental Conservation  
Division of Solid and Hazardous Waste  
Bureau of Hazardous Waste Operations  
50 Wolf Road, Albany, New York 12233

Part II

Generator Inspection Section

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

1. Requirements for Category 1-4 Generators:

Refer to questions based upon category checked in Part I.

A.      If in Part I an exemption applies, inspection is complete if only category company is regulated under and requirements for that exemption are met.           

B. If Category 1 and 4 generators or generators exempt for used engine lubricating oil, has met the following:

     disposed in a solid waste facility - 365.1(e)(1)(i)(a)           

     made a hazardous waste determination - 365.1(e)(1)(i)(b)           

C. If Category 2 and 3 generators has met the following:

     made a hazardous waste determination - 365.1(e)(1)(ii)(a)           

     disposed of in authorized hazardous waste facility - 365.1(e)(1)(ii)(b)           

     submitted document justifying exemption - 365.1(e)(1)(ii)(c)           

     used appropriate containers; properly packaged, labeled and marked during storage and shipment - 365.1(e)(1)(ii)(d)           

     had containers and tanks stored properly; inspected at least quarterly - 365.1(e)(1)(ii)(e)           

     had tanks designed, constructed and operated in accordance with regulations - 365.1(e)(1)(ii)(f)           

     had tanks properly sheltered and protected - 365.1(e)(1)(ii)(g)           

D. If Category 3 generator, has:

     annual report prepared - 365.1(e)(1)iii; and           

     sent to DEC - 365.2(c)2

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

For Category 5 and 6 generators complete remainder of Part II.

2. Labeling & Marking

- A. \_\_\_\_\_ The container is marked with the date upon which each period of accumulation begins - 365.2(a)(7)(ii)(c) \_\_\_\_\_
- B. \_\_\_\_\_ The container is labeled and marked in accordance with paragraphs 365.2(a)4 and 365.2(a)5. \_\_\_\_\_  
- 365.2(a)(7)(ii)(d)

3. On-site accumulation of hazardous waste prior to shipment - 365.2(a)7. \_\_\_\_\_  
(For generators who accumulate any hazardous waste for a period of 90 days or less or store 8,800 gallons or less in containers or 20,000 gallons or less in tanks.)

- A. \_\_\_\_\_ All such wastes are shipped off-site to a permitted treatment, storage or disposal (TSD) facility in 90 days or less or treated on-site of generation in 90 days or less - 365.2(a)(7)(ii)(a) \_\_\_\_\_
- B. \_\_\_\_\_ The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container 365.2(a)(7)(ii)(c) \_\_\_\_\_
- C. Standards for management of containers - 365.2(a)8  
(This section will also be completed for TSD's as referred to from Appendix A.)

1. What type of containers are used for accumulation? Describe the size, type. (e.g., 12 fifty-five gallon drums of waste acetone).

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Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

2.        The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition and number that are leaking or corroded. Be detailed and specific)-365.2(a)(8)iii or 360.8(c)(8)(i).
- 
- 
3.        Hazardous waste stored in containers made of compatible materials in accordance with paragraph 365.2(a)3 - 365.2(a)(8)i or 360.8(c)(8)ii (If not, please explain).
- 
- 
4.        All containers except those in use are closed - 365.2(a)(8)ii or 360.8(c)(8)(iii)(a)
5.        Containers holding hazardous waste do not appear to be opened, handled or stored in a manner which may rupture the container or cause it to leak - 365.2(a)(8)iii or 360.8(c)(8)(iii)(b)
6.        The storage area is inspected at least weekly - 365.2(a)(8)iv or 360.8(c)(8)(iv)
7.        Containers holding ignitable and reactive wastes are located at least 15 meters (50 feet) from the facility's property line - 365.2(a)(8)v or 360.8(c)(8)(v)
8.        The generator complies with the following special requirements related to storage of ignitable, reactive or incompatible wastes 365.2 (a)(8)vi:
- Special requirements related to storage of ignitable, reactive or incompatible wastes - 365.2(a)(10) and 360.8(c)(1)(v)

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (A) \_\_\_\_\_ Generator has taken precautions to prevent \_\_\_\_\_  
accidental ignition or reaction of ignitable or  
reactive waste - 365.2(a)(10)i and 360.8(c)(1)(v)(a)
- (B) \_\_\_\_\_ Generator has placed "No Smoking" signs \_\_\_\_\_  
conspicuously wherever there is a hazard from  
ignitable or reactive waste - 365.2(a)(10)i and  
360.8(c)(1)(v)(a)
- (C) \_\_\_\_\_ The storage of ignitable or reactive wastes, and the \_\_\_\_\_  
mixture or comingling of incompatible wastes, or  
incompatible wastes and materials, is conducted  
to prevent - 365.2(a)(10)(ii) and 360.8(c)(9)(i) and  
360.8(c)(1)(v)
- (a) \_\_\_\_\_ the generation of extreme heat or pressure, \_\_\_\_\_  
fire or explosion, or violent reaction -  
365.2(a)(10)(ii)a or 360.8(c)(1)(v)(b)(1)
- (b) \_\_\_\_\_ production of uncontrolled toxic mists, \_\_\_\_\_  
fumes, dusts or gases in sufficient quantities  
to threaten human health - 365.2(a)(10)(ii)(b)  
or 360.8(1)(v)(b)(4)
- (c) \_\_\_\_\_ production of uncontrolled flammable fumes \_\_\_\_\_  
or gases in sufficient quantities to pose  
a risk of fire or explosions - 365.2(a)(10)(ii)c  
or 360.8(c)(1)(v)(b)(3)
- (d) \_\_\_\_\_ the damage to the structural integrity of \_\_\_\_\_  
the device or facility containing the  
waste - 365.2(a)(10)(ii)d or 360.8(c)(1)(v)(b)(4)
- (e) \_\_\_\_\_ a threat to human health or the environment \_\_\_\_\_  
- 365.2(a)(10)(ii)e or 360.8(c)(1)(v)(b)(4)

D. Standards for management of tanks - 365.2(a)9

1. What are the approximate number and size of tanks containing hazardous waste?

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Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

2. Identify the waste treated/stored in each tank. Include whether they are above or below ground.

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\_\_\_\_\_ If the tanks are below ground, they can be entered for inspection. \_\_\_\_\_

Tank General Operating Requirements - 365.2(a)(9)i

3. \_\_\_\_\_ Hazardous wastes or treatment reagents are not placed in the tank, such that they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life - 365.2(a)(9)(i)(a) or 360.8(c)(9)(i)(b). If so, please explain. \_\_\_\_\_
4. \_\_\_\_\_ There are no leaking tanks. \_\_\_\_\_  
(If tanks are leaking, describe the type, condition\* and number that are leaking or corroded. Be detailed and specific.)
5. \_\_\_\_\_ Uncovered tanks have at least 60 centimeters (2 feet) of freeboard or an adequate containment structure - 365.2(a)(9)(i)(b) or 360.8(c)(9)(i)(c) \_\_\_\_\_
6. \_\_\_\_\_ Waste is continuously fed into a tank, but the tank is equipped with a means to stop the inflow from the tank (e.g., bypass system to a standby tank or a waste feed cutoff system) - 365.2(a)(9)i or 360.8(c)(9)(i)(d) \_\_\_\_\_

Tank Inspections - 365.2(a)(9)ii

7. Tank(s) are inspected each operating day for:

- (A) \_\_\_\_\_ discharge control equipment (e.g., waste feed cutoff systems, bypass systems and drainage systems) - 365.2(a)(9)(ii)(a) or 360.8(c)(9)(iii)(a)(1) \_\_\_\_\_
- (B) \_\_\_\_\_ monitoring equipment (e.g., pressure and temperature gauges) - 365.2(a)(9)(ii)(b) or 360.8(c)(9)(iii)(a)(2) \_\_\_\_\_
- (C) \_\_\_\_\_ level of waste in tank to ensure proper freeboard - 365.2(a)(9)(ii)(c) or 360.8(c)(9)(iii)(a)(3) \_\_\_\_\_

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

8. Tank(s) are inspected weekly for:

- \_\_\_\_ Corrosion of leaking of fixtures or seams - \_\_\_\_\_  
365.2(a)(9)(ii)(d) or 360.8(c)(9)(iii)(a)(4)
- \_\_\_\_ Erosion or obvious signs of leakage (e.g., wet spots or \_\_\_\_\_  
dead vegetation) of the construction materials of, and  
the area immediately surrounding discharge confinement  
structures (e.g., dikes). 365.2(a)(9)(ii)(e) or  
360.8(c)(9)(iii)(a)(5)

9. Ignitable or reactive wastes - 365.2(a)(9)iii

- (A) \_\_\_\_ Ignitable or reactive waste is placed in a tank \_\_\_\_\_  
and the waste is stored, treated, rendered or  
mixed before or immediately after placement in the  
tank so that the resulting wastes, mixture or  
dissolution of material is no longer ignitable or  
reactive-365.2(a)(9)(iii)(a) or 360.8(c)(9)(v)(a)(1)
- (B) \_\_\_\_ Ignitable and reactive waste is stored in a tank \_\_\_\_\_  
and the tank is used solely for emergencies -  
365.2(a)(9)(iii)(a)3 or 360.8(c)(9)(v)(a)(3)
- (C) \_\_\_\_ Storage of ignitable or reactive waste in covered \_\_\_\_\_  
tanks does not comply with the National Fire Protection  
Association's (NFPA's) buffer zone requirements for  
tanks, contained in Tables 2-1 thru 2-6 of the  
"Flammable and Combustible Code, 1977."

10.

- (A) \_\_\_\_ Incompatible wastes, or incompatible wastes and \_\_\_\_\_  
materials, are placed in the same tank in  
compliance with 365.2(a)(10)ii - 365.2(a)(9)(iv)a  
or in compliance with 360.8(c)(1)(v)b -  
360.8(c)(9)(vi)a
- (B) \_\_\_\_ Incompatible wastes are placed in an unwashed tank \_\_\_\_\_  
which previously held an incompatible waste or  
material in compliance with 365.2(a)(10)ii -  
365.2(a)(9)(iv)b or in compliance with  
360.8(c)(1)(v)b - 360.8(c)(9)(vi)b



Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (C) \_\_\_\_\_ The generator has abandoned use of a tank used to \_\_\_\_\_  
store hazardous waste and has removed from such  
tanks and related discharge control equipment and  
discharge confinement structures all hazardous waste  
and hazardous waste residues.

4. Manifest Records - 365.2(b)

- A. \_\_\_\_\_ It appears, from the available information, that \_\_\_\_\_  
there is a manifest copy available for each hazardous waste  
shipment that has been made - 365.2(b)(5)i.

If "violation" checked or "don't know," please elaborate.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- B. Describe the approximate size of an average shipment made and \_\_\_\_\_  
how many shipments per month?

- C. Each manifest (a representative sample) has the following  
information: - 365.3(b) and 365.3(b)(1)i

	Generator	Transporter 1	Transporter 2	TSDF	
1. _____ Name of	_____	_____	_____	_____	_____
2. _____ EPA ID No. of	_____	_____	_____	_____	_____
3. _____ Mailing Address of	_____	_____	_____	_____	_____
4. _____ Telephone No. of	_____	_____	_____	_____	_____
5. _____ Manifest Document No.	_____	_____	_____	_____	_____
6. _____ The proper USDOT description.					_____
7. _____ The appropriate _____ quantity, _____ container no. _____ container type, and _____ waste type by units of weight or volume.					

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

8. ☐ Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC - 365.2(a)3 and 365.2(a)4 and 365.2(a)5 ☐
9. ☐ Signature of transporter acknowledging receipt of materials ☐
10. ☐ Date of delivery and signature on the appropriate certification on the manifest - 365.3(b)(5)i ☐
11. ☐ Signed copies of the manifest records have been retained at the facility for at least three years - 365.3(b)(5)iii or 365.3(c)1 or 365.3(c)3 ☐
- D. ☐ There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest - 365.2(b)(1)ii and 355.2(b)(1)iii ☐
- E. ☐ The generator has distributed copies of the manifest as specified on the manifest form - 365.2(b)2 ☐
- F. International shipments - 365.5 ☐
- (1) ☐ EPA has been notified four weeks prior to shipment of hazardous waste destined for treatment, storage or disposal outside the United States - 365.5(b)(1) ☐
- (2) ☐ Delivery of the wastes has been confirmed within 90 days of acceptance of initial transporter - 365.5(b)2 ☐
- (3) ☐ The generator has identified the point of departure from the United States through which the waste must travel before entering a foreign country - 365.5(b)(3)ii ☐
- (4) ☐ Has complied with interstate shipments - 365.6 ☐
- (5) ☐ Has complied with shipments by rail or water (bulk) - 365.7 ☐
- (6) ☐ Has complied with shipments which involve the use of one or more transfer stations - 365.8 ☐

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

G. \_\_\_\_\_ Copies of all records have been kept for at least three years (e.g., annual reports, manifests, exception reports, sampling data) - 365.2(c)(1)i \_\_\_\_\_

H. \_\_\_\_\_ All records required under this subdivision were furnished upon request, or made available at a reasonable time for inspection - 365.2(c)(1)iv \_\_\_\_\_

I. \_\_\_\_\_ The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 20 days ago: \_\_\_\_\_

\_\_\_\_\_ If not, exception reports have been submitted covering these shipments - 365.2(c)(3) \_\_\_\_\_

5. Personnel Training - 365.2(a)(7)(ii)e and 360.8(c)(1)(vi)

A. There is a:

\_\_\_\_\_ written description of the job title for each position at the facility related to hazardous waste management and name of the employee filling each job-360.8(c)(1)(vi)(d)1 \_\_\_\_\_

\_\_\_\_\_ written job description for each position 360.8(c)(1)(vi)(d)2 \_\_\_\_\_

\_\_\_\_\_ written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 360.8(c)(1)(vi)(d)3 \_\_\_\_\_

\_\_\_\_\_ Records that document the training or job experience required 360.8(c)(1)(vi)(d)4 \_\_\_\_\_

B. \_\_\_\_\_ The training program is directed by a person trained in hazardous waste management procedures and includes instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. 360.8(c)(1)(vi)(a)2. The components are: \_\_\_\_\_

(1) \_\_\_\_\_ Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment; \_\_\_\_\_

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (2) ☐ Key parameters for automated waste feed cutoff systems; ☐
- (3) ☐ Communications or alarm systems; ☐
- (4) ☐ Response to fires and explosions; ☐
- (5) ☐ Response to groundwater contamination incidents; and ☐
- (6) ☐ Shutdown of operations. ☐

- C. ☐ Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment. 360.8(c)(1)(vi)b ☐
- D. ☐ Facility personnel have taken part in an annual review of the initial training required. 360.8(c)(1)(vi)c ☐
- E. ☐ Training records on current personnel have been kept permanently at the facility (until closure). 360.8(c)(1)(vi)e ☐
- F. ☐ Training records on former employees have been kept for at least three years from the date the employee last worked at a facility. 360.8(c)(1)(vi)e ☐

6. Preparedness and Prevention - 365.2(a)(7)(ii)e and 360.8(c)2

- A. ☐ The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 360.8(c)(2)i ☐
- B. ☐ The facility is equipped with the following (Check missing equipment if needed in this facility's particular operations.) - 360.8(c)(2)ii ☐
  - (1) ☐ An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility; ☐

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

- (2) ☐ A device, such as a telephone or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams; ☐
- (3) ☐ Portable fire extinguishers, fire control equipment. ☐
- (4) ☐ Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems. ☐
- C. ☐ Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 360.8(c)(2)iii ☐
- D. ☐ Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device 360.8(c)(2)iv ☐
- E. ☐ The facility has the required aisle space - 360.8(c)(2)v (Inspections should be able to be made of each drum and space should be sufficient to fight a fire). ☐
- F. ☐ The facility owner or operator has made an attempt in good faith to make the following arrangements with local authorities, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations - 360.8(c)(2)vi: ☐
- (1) ☐ Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility; ☐
- (2) ☐ Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority; ☐
- (3) ☐ Agreements with government emergency response teams, emergency response contractors, and equipment suppliers; ☐
- (4) ☐ Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions or releases at the facility; and ☐

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

- (5) ☐ Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record. ☐

7. Contingency Plan and Emergency Procedures - 365.2(a)(7)(ii)e and 360.8(c)3

A. ☐ The facility has a contingency plan - 360.8(c)(3)(i)a ☐

B. ☐ The following are included in the contingency plan - 360.8(c)(3)ii ☐

- (1) ☐ A description of actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water; ☐
- (2) ☐ A spill prevention, control, and countermeasure (SPCC) plan in accordance with Part 112 or Part 151 of 40 CFR, or some other emergency or contingency plan, amended to incorporate hazardous waste management provisions that are sufficient; ☐
- (3) ☐ A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services; ☐
- (4) ☐ Names, addresses and phone numbers of all persons qualified to act as emergency coordinator; ☐
- (5) ☐ A list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required; ☐
- (6) ☐ The location and the physical description of each item on the list, and a brief outline of its capabilities; ☐
- (7) ☐ An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary. ☐

C. ☐ Copies of the contingency plan are maintained at the facility - 360.8(c)(3)(iii)a ☐

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

- D.        Copies of the contingency plan have been submitted to all  
local police departments, fire departments, hospitals, and state  
and local emergency response teams that may be called upon to  
provide emergency services - 360.8(c)(3)(iii)b
- E.        The contingency plan has been amended - 360.8(c)(3)iv
- F.        There was at least one employee either on the facility  
premises or on call with the responsibility for coordinating  
all emergency response measures - 360.8(c)(3)v
- G.        During a past emergency situation the emergency coordinator  
or) his designee when the emergency coordinator is not on call)  
immediately activated emergency procedures - 360.8(c)(3)vi

The following was done:

- (1)        Activated internal facility alarms or  
communication systems;
- (2)        Notified appropriate state or local agencies;
- (3)        Immediately identified the character, extent, \*  
exact source, amount and areal extent of any released  
materials;
- (4)        The emergency coordinator assessed possible  
hazardous to human health and the environment;
- (5)        The emergency coordinator, after determining that  
the facility had a release, fire or explosion which  
could threaten human health or the environment outside  
the facility, reported his findings;
- (6)        During the emergency, the emergency coordinator took  
all reasonable measures necessary to ensure that  
fire, explosions and releases do not occur, recur  
or spread to other hazardous waste;
- (7)        The emergency coordinator monitored for  
leaks, pressure buildup, gas generation or ruptures  
in valves, pipes or other equipment, where appropriate  
during the facility's response to the emergency;

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (8) — The emergency coordinator provided for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility; —
- (9) — The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of prior to cleanup procedures being completed; —
- (10) — The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed; —
- (11) — The owner or operator notified the Commissioner that the facility is in compliance before operations were resumed in the affected areas of the facility; —
- (12) — The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan; —
- (13) — The owner or operator submitted a written report or complete written report on the incident within 15 days after the incident occurred. —



PART III

Comments, Conclusions and Recommendations Section

Facility Name HAZARDOUS WASTE DISPOSAL INC. (HWD)

EPA I.D. No. NYT 000603894

Date of Inspection 06/25/85

General Comments and Conclusions (cite appropriate State regulations in violation and attach additional sheets and other information as required)

FACILITY HAS CLOSED - G. LAWRENCE HAS BEEN THROUGH  
APPLIED ENVIRONMENTAL SERVICES (AES) AND NOW HAS  
A COMPANY CALLED ENVIRONMENTAL COMPLIANCE INC.

THERE IS NO CLOSURE PLAN ON FILE. THE  
SITE IS FAIRLY CLEAN. THERE IS A DUMP  
TRUCK IN THE BACK LOT WITH EMPTY DRUMS ON  
IT HOWEVER IN THE BUILDING NEXT DOOR THERE  
IS A DRUM RECLAIMER SO DIFFERENTIATING BETWEEN  
DRUMS LEFT BY (HWD) AND DRUMS FROM THE  
RECLAIMER IS IMPOSSIBLE.

I RECOMMEND THE SITE BE RECLASSIFIED AND  
PLACED IN A DEAD FILE.

Recommendations EPA I.D. No. NY D 0 0 0 6 0 3 8 9 4

☐ Formal confidentiality is being requested.

☒ No follow-up necessary.

☐ Do you recommend that the central office wait a maximum of two weeks for you to review supplemental documents prior to determining if a warning letter should be issued?

☐ A soft warning letter should be issued.

☐ A strong warning letter should be issued.

☐ A complaint letter should be issued and a fine levied.

☐ DO NOT PROCESS, THIS COMPANY HAS BEEN REFERRED TO THE BUREAU OF ENVIRONMENTAL CONSERVATION INVESTIGATION (BECI) ON \_\_\_\_\_ (Date)

☐ Facility representative would like a copy of report (inspector submit two copies to C.O. and C.O. will send with reply)

☐ Facility representative has been given a copy of report on \_\_\_\_\_ (Date)

☒ Other (please explain)

The site has no closure plan or file which is  
a violation however the site is relatively clean  
and is closed.

☐ Sample(s) have been taken.

Comments on sample results: \_\_\_\_\_

New York State Department of Environmental Conservation  
Division of Solid and Hazardous Waste  
Bureau of Hazardous Waste Operations  
50 Wolf Road, Albany, New York 12233

Appendix A

Treatment, Storage and Disposal Inspection Section

Indicate:

X Violations

N/A Co out of  
Business  
NYT000603894

Indicate:

X Satisfactory

NA Not Applicable

1. Modifications

There have been the following modifications to existing facilities with a proper application to DEC:

- (A) \_\_\_ Expansion of the facility by the acquisition (by purchase, lease or otherwise) of additional land - 360.3(c)(1)(ii)a \_\_\_
- (B) \_\_\_ Movement of the disposal operation to a portion off property already owned, leased or otherwise held by such person - 360.3(c)(1)(ii)b \_\_\_
- (C) \_\_\_ Increase of the total quantity of solid waste received during any quarter at the facility by fifty (50) percent or more over the total quantity of solid waste received during the comparable quarter of the preceding year (except where such increase is not in excess of the approved design capacity of the facility for such time period - 360.3(c)(1)(ii)c \_\_\_
- (D) \_\_\_ Expansion of the facility by the installation of additional processing equipment which increases the approved design capacity of the facility or changes the facility process - 360.3(c)(1)(ii)d \_\_\_
- (E) \_\_\_ Addition of any solid waste stream or solid waste type not previously approved, or any change in solid waste type accepted at the facility, other than for resource recovery facilities - 360.3(c)(1)(ii)e \_\_\_

Requirements for Hazardous Waste Management Facilities

2. Owner Transfer

- (A) \_\_\_ The facility has transferred ownership or operation of facility with prior written approval of the Department - 360.8(c)(1)(i)(a). \_\_\_

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

- (B) ☐ Before transferring ownership or operation of a facility ☐ during its operating life, or of a disposal facility during the post-closure care period, the owner or operator notified the new owner or operator in writing of the requirements - 360.8(c)(1)(i)(b).

3. Sampling

- (A) ☐ The owner or operator obtained a sample of the waste and had it analyzed - 360.8(c)(1)(ii)(a)(1); or ☐
- (B) ☐ The analysis included data developed under Part 366 of this Title, and existing published or documented data on the hazardous waste or on waste generated from similar processes - 360.8(c)(1)(ii)(a)2 ☐
- (C) ☐ The analysis has been repeated as necessary to ensure that it is accurate and up to date-360.8(c)(1)(ii)(a)(3) ☐

4. Waste Analysis Plan -

- (A) ☐ The owner or operator has developed and followed a written waste analysis plan - 360.8(c)(1)(ii)b ☐
- (B) ☐ The owner or operator keeps this plan at the facility. ☐
- (C) ☐ The plan specifies at a minimum:
- (1) ☐ The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters - 360.8(c)(1)(ii)(b)1 ☐
- (2) ☐ The test methods which will be used to test for these parameters - 360.8(c)(1)(ii)(b)2 ☐
- (3) ☐ The sampling method which will be used to obtain a representative sample of the waste to be analyzed - 360.8(c)(1)(ii)(b)3 ☐
- (4) ☐ The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date - 360.8(c)(1)(ii)(b)4 ☐

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (5)      For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply - 360.8(c)(1)(ii)(b)5
- (6)      Where applicable, the methods which will be used to meet the additional waste analysis requirements for the specific waste management methods as specified in:
- 360.8(c)(9)(ii) Tanks - Waste analysis and trial tests
- (7) (For off-site facilities) The waste analysis plan required must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper. The plan describes, at a minimum:
- (a)      The procedure which will be used to determine the identity of each movement of waste managed at the facility - 360.8(c)(1)(ii)(c)(1); and
- (b)      The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling - 360.8(c)(1)(ii)(c)1

5. Security - 360.8(c)(1)iii

- (A) The owner or operator has adequately prevented the unknowing entry, or minimized the possibility for the unauthorized entry, of persons or livestock onto the active portion of his facility, because:
- (1)      Physical contact with the waste, structures or equipment,      or with the active portion of the facility may injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility - 360.8(c)(1)(iii)(a)1
- (2)      Disturbance of the waste or equipment, by the unknowing      or unauthorized entry of persons or livestock onto the active portion of a facility, may cause a violation of the requirements - 360.8(c)(1)(iii)(a)2
- (B) If not exempt under A1 or A2 above, the facility must have the following:

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (1)        A 24-hour surveillance system which continuously monitors         
and controls entry onto the active portion of the facility         
- 360.8(c)(1)(iii)(b)1 or
- (2)        An artificial or natural barrier which completely         
surrounds the active portion of the facility         
- 360.8(c)(1)(iii)(b)(2)(i) and
- A means to control entry, at all times, through the         
gates or other entrances to the active portion of the         
facility - 360.8(c)(1)(iii)(b)(2)(ii)
- (C)        If not exempt under A1 or A2 above, the facility must have the  
following:
- (1)        A sign with the legend, "Danger - Unauthorized Personnel         
Keep Out" posted at each entrance to the active portion         
of a facility, and at other locations, in sufficient numbers  
to be seen from any approach to that active portion.

6. General Inspection Requirements - 360.8(c)(1)(iv)

- (A)        The owner or operator has inspected the facility         
for malfunctions and deterioration, operator errors, and         
discharges which may be causing - or may lead to release  
of hazardous waste constituents to the environment, or a  
threat to human health - 360.8(c)(1)(iv)(a)
- (B)(1)        The owner or operator has developed a written         
schedule for inspecting all monitoring equipment, safety         
and emergency equipment, security devices, and operating  
and structural equipment that are important to preventing,  
detecting or responding to environmental or human health  
hazards - 360.8(c)(1)(iv)(b)(1)
- (2)        He has not kept the written inspection schedules at         
the facility - 360.8(c)(1)(iv)(b)(2)
- The schedule identifies the types of problems         
which are to be looked for during the inspection         
- 360.8(c)(1)(iv)(b)(3)
- The frequency of inspection is based on the rate         
of possible deterioration of the equipment and the         
probability of an environmental or human health incident,  
if the deterioration or malfunction or any operator error  
goes undetected between inspections - 360.8(c)(1)(iv)(b)(4)

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (C) \_\_\_\_ The owner or operator has remediated deterioration or malfunction of equipment or structures which the inspection has revealed. \_\_\_\_
- (D) \_\_\_\_ The owner or operator has recorded inspections in an inspection log or summary. \_\_\_\_
- (E) \_\_\_\_ The inspection log or summary has been kept for at least three years from the date of inspection. \_\_\_\_
- (F) \_\_\_\_ The records, at a minimum, include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. \_\_\_\_

7. Ignitable or reactive wastes - Complete Part II 3 C 8 and 3 D 9.

8. Personnel Training - Complete Part II 5.

9. Preparedness and Prevention - Complete Part II 6

10. Contingency Plan and Emergency Procedures - Complete Part II 7

11. Manifest system, recordkeeping and reporting - 360.8(c)4

The regulations in this paragraph apply to the owners and operators of all hazardous waste facilities.

A. Operating Record

- (1) \_\_\_\_ There is an operating record. \_\_\_\_
- (2) \_\_\_\_ The owner or operator has kept a written operating record at his facility. \_\_\_\_
- (3) The following information is included in the operating record, as it becomes available, or maintained in the operating record until closure of the facility:

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (a) ☐ A description and the quantity of each hazardous waste received; ☐
- (b) ☐ The method(s) and date(s) of its treatment, storage or disposal at the facility; ☐
- (c) ☐ The location of each hazardous waste within the facility and the quantity at each location; ☐
- (d) ☐ (For disposal facilities) The location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. ☐
- (e) ☐ Information must include cross references to specific manifest document numbers, if the waste was accompanied by a manifest; ☐
- (f) ☐ Records and results of waste analyses and trail tests performed; ☐
- (g) ☐ Summary reports and details of all incidents that require implementing the contingency plan; ☐
- (h) ☐ Records and results of inspections; ☐
- (i) ☐ Monitoring, testing or analytical data; ☐
- (j) ☐ All closure cost estimates. ☐
- (k) ☐ (For disposal facilities) All post-closure cost estimates. ☐

B. Manifest

- (1) Upon receipt of manifested shipment of hazardous waste the owner or operator: ☐
  - (a) ☐ determined significant discrepancies from those stated on the manifest - 365.4(b)(1)(i) ☐
  - (b) ☐ determined that all portions of the manifest have been completed - 365.4(b)(1)(ii), Explain ☐

\_\_\_\_\_  
\_\_\_\_\_



Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (c) — complete and distribute copies of the manifest as indicated in the instructions with the manifest form - 365.4(b)(1)(iii) —
- (2) Upon receipt of an unmanifested shipment of hazardous waste the owner and operator: —
- (a) — determined the reason why the shipment was not accompanied by a manifest - 365.4(b)(2)(i) —
- (b) — filed an unmanifested waste report after accepting the waste - 365.4(b)(2)(iii) —
- (3) — Facility accepted a particular hazardous waste without an authorized permit to do so - 365.4(b)(5)(i) —
- (4) — Facility accepted a hazardous waste without having adequate treatment, storage or disposal capacity available. —

C. Annual report

1. — The owner or operator retained annual reports for the last three years 365.4(c)(3)(i). —

D. Additional reports - 360.8(c)(4)(iv)

In addition to submitting the annual report and unmanifested waste reports described in Subparagraph 360.8(c)(4)(iii), Paragraphs 365.4(c)(2) and 365.7(c)(2), of this Title, the owner or operator must also report to the Commissioner:

- (A) — Releases, fires and explosions as specified in Clause 360.8(c)(3)(vi)(j) - 360.8(c)(4)(iv)a —
- (B) — Groundwater contamination and monitoring data as specified in subparagraphs 360.8(c)(5)(iv) and 360.8(c)(5)(v) - 360.8 (c)(4)(iv)b —
- (C) — Facility closure as specified in Subparagraph 360.8(c)(6)(v) - 360.8(c)(4)(iv)c —

E. Availability, retention and disposition of records

- (1) — All records, including plans, required under this Part are furnished upon request, and made available at all reasonable times for inspection - 360.8(c)(4)(ii)(a). —

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

(2)      All reports and records required were retained for  
three years from the date of submittal - 365.4(c)(3)(i)     

(3)      Upon closure of the facility, a copy of records of waste  
disposal locations and quantities under Subclause  
360.8(c)(4)(i)(b)(2) was submitted to the Commissioner  
and the county clerk's office of the county in which the  
facility is located - 360.8(c)(4)(ii)(c).     

12. Groundwater monitoring. - 360.8(c)5

(A)      A groundwater monitoring plan is required.     

(B)      ATTACH COMPLETED GROUNDWATER MONITORING QUESTIONNAIRE  
- APPENDIX A     

(C)      A groundwater monitoring program is required, and has  
been instituted.     

13. Closure and post-closure. - 360.8(c)6

(A)      The owner or operator has a written closure plan  
- 360.8(c)(6)(ii)(a).     

(1)      The plan is kept at the facility-360.8(c)(6)(ii)(a)     

(2) The plan identifies:

(a)      How and when the facility will be      partially       
closed if applicable; and      ultimately closed       
- 360.8(c)(6)(ii)(a)(1)     

(b)      The maximum extent of the operation which will be       
unclosed during the life of the facility -       
360.8(c)(6)(ii)(a)(1)     

(c)      The manner to close the facility that minimizes  
the need for further maintenance - 360.8(c)(6)(ii)(a)(1)     

(d)      All the hazardous waste and hazardous waste  
residues that must be removed from tanks, discharge  
control equipment, and discharge confinement structures  
- 360.8(c)(9)(iv).     

(e)      An estimate of the maximum inventory of wastes in       
storage or in treatment at any given time during the  
life of the facility - 360.8(c)(6)(ii)(a)(2)

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

- (f)        A description of the steps needed to decontaminate facility equipment during closure -         
360.8(c)(6)(ii)(a)(3)
- (g) A schedule for final closure including:
- The anticipated date when wastes will no longer be received - 360.8(c)(6)(ii)(a)(4)
- The date when completion of the final closure is anticipated - 360.8(c)(6)(ii)(a)(4)
- Intervening milestone dates which will allow tracking of the progress of closure         
-360.8(c)(6)(ii)(a)(4)
- (B)        The owner or operator has amended his plan when changes in operating plans or facility design affect the closure plan -         
360.8(c)(6)(ii)(b)
- (C)        The owner or operator has submitted his closure plan to the Commissioner at least 180 days before the date he expects to begin closure - 360.8(c)(6)(ii)(c)

NOTE: The following (13D - 13J) are for owners and operators of disposal facilities only.

(D) Post-closure care consists of at least:

1.        Groundwater monitoring and reporting         
- 360.8(c)(6)(vi)(a)(1)
2.        Maintenance of monitoring and waste containment systems         
- 360.8(c)(6)(vi)(a)(2)
3.        Maintenance of any or all of the security requirements         
if required by the Commissioner - 360.8(c)(6)(vi)(b)

(E) Post-closure use of property on or in which hazardous waste remains after closure is disturbing the integrity of the        final cover,        liner(s), or        other components of any containment system, or        the function of the facility's monitoring systems, and the owner or operator has demonstrated to the Commissioner, either in the post-closure plan or by petition, that the disturbance:

1.        Is necessary to the proposed use of the property, and         
will not increase the potential hazard to human health  
or the environment - 360.8(c)(6)(vi)(c)(1)

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

2.        Is necessary to reduce a threat to human health or the environment - 360.8(c)(6)(vi)(c)(2).
- (F)        Some or all of the requirements for post-closure care have discontinued or altered before the end of the 30-year period with approval - 360.8(c)(6)(vi)(d)
- (G)        The owner or operator of a disposal facility has a written post-closure plan - 360.8(c)(6)(vii)(a)
- (H)        The owner or operator of a disposal facility keeps this plan at the facility - 360.8(c)(6)(vii)(a)
- (I)        This plan identifies:
1.        Groundwater monitoring activities and frequencies - 360.8(c)(6)(vii)(a)(1)
2.        Maintenance activities and frequencies - 360.8(c)(6)(vii)(a)(2)
- (J)        The owner or operator has amended his post-closure plan, and changes have occurred in operating plans or facility designs which affect his post-closure plan - 360.8(c)(6)(vii)(b)

14. Financial requirements - 360.8(c)7

- (A)        The owner or operator has a written estimate of the cost of closing the facility.
- (B)        The owner or operator has kept this estimate, and all subsequent estimates required at the facility.
- (C)        The estimate appears to equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. (PLEASE EXPLAIN)
- (D)        The owner or operator has prepared a new closure cost estimate whenever a change in the closure plan affects the cost of closure.

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- (E)\_\_\_ On each anniversary of the effective date of these regulations, \_\_\_\_\_  
the owner or operator has adjusted the latest closure cost estimate.

(FOR OWNERS AND OPERATORS OF DISPOSAL FACILITIES)

- (F)\_\_\_ The owner or operator of a disposal facility has a \_\_\_\_\_  
written estimate of the annual costs of post-closure monitoring  
and maintenance of the facility.
- (G)\_\_\_ The owner or operator has kept this estimate, and all \_\_\_\_\_  
subsequent estimates required in this Section, at the facility.
- (H)\_\_\_ The owner or operator has prepared an annual post-closure \_\_\_\_\_  
cost estimate whenever a change in the post-closure plan affects  
the cost of post-closure care.
- (I)\_\_\_ On each anniversary of the effective date of these regulations, \_\_\_\_\_  
during the operating life of the facility, the owner or operator has  
adjusted the latest post-closure cost estimate.

15. Use and management of containers. - 360.8(c)8

- (A) Complete Part 11-3 C
- (B)\_\_\_ Incompatible wastes, or incompatible wastes and materials, are \_\_\_\_\_  
placed in the same container. - 360.8(c)(8)(vi)a
- (C)\_\_\_ Hazardous waste is not placed in an unwashed container that \_\_\_\_\_  
previously held an incompatible waste or material. -  
360.8(c)(8)(vi)(b)
- (D)\_\_\_ A storage container holding a hazardous waste that is incompatible \_\_\_\_\_  
with any waste or other materials stored nearby in other containers,  
piles, open tanks or surface impoundments, is separated from the  
other materials or protected from them by means of a dike, berm, wall  
or other device. - 360.8 (c)(8)(vi)c

16. Tanks. - 360.8(c)9

- (A) Complete Part II-3D
- (B) The tank is to be used to chemically treat or store a hazardous waste  
which is substantially different from waste previously treated or  
stored in that tank, and the owner or operator has, before treating or  
storing the different waste or using the different process:
- (1)\_\_\_ Conducted waste analyses and trial treatment or storage \_\_\_\_\_  
tests (e.g., bench scale or pilot plant scale tests -  
360.8(c)(9)(ii)(a)(1)(i) or

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

(2)\_\_\_ obtained written, documented information on similar \_\_\_\_\_  
storage or treatment of similar waste under similar operating  
conditions - 360.8(c)(9)(ii)(a)(1)(ii)

(C) Chemically treat hazardous waste with a substantially different process  
than any previously used in that than, and the owner or operator not,  
before treating or storing the different waste or using the different pro-  
cess:

(1)\_\_\_ Conducted waste analyses and treat treatment or storage \_\_\_\_\_  
tests (e.g., bench scale or pilot plant scale tests) - \_\_\_\_\_  
360.8(c)(9)(ii)(a)(2)(i) or

(2)\_\_\_ Obtained written, documented information on similar \_\_\_\_\_  
storage or treatment of similar waste under similar operating  
conditions. - 360.8(c)(9)(ii)(a)(2)(ii)

New York State Department of Environmental Conservation  
Division of Solid and Hazardous Waste  
Bureau of Hazardous Waste Operations  
50 Wolf Road, Albany, New York 12233

Appendix B

Transporter Terminal Inspection Section

Each manifest (or a representative sample) does not have  
the following information 365.3(b):

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

*N/A Co out of Business*

*NYT 000663894*

	<u>Generator</u>	<u>#1 Transporter</u>	<u>#2 Transporter</u>	<u>TSDF</u>
___ Name of	___	___	___	___
___ EPA I.D. Number	___	___	___	___
___ Mailing Address of	___	___	___	___
___ Telephone Number of	___	___	___	___
___ Manifest Document No.				
___ The proper US DOT description.				___
___ The appropriate ___ quantity, ___ container no., ___ container type, ___ waste type by units of weight or volume.				___
___ Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper con- dition for transportation under regulations of the US DOT and NYS DEC. 365.3(b)(1)ii				___
___ Signature of transporter acknowledging receipt of materials.				___
___ Date of delivery and signature on the appropriate certification on the manifest. 365.3(b)(5)(i)				___
___ Signed copies of the manifest records have been retained at the facility for at least three years. 365.3(b)(5)iii or 365.3(c)1 or 365.3(c)3				___

The transporter is listed as a generator, and has:

\_\_\_ transported wastes into the United States from abroad.  
365.3(a)(3)i

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

- \_\_\_ mixed hazardous wastes of different chemical composition by placing them into a single container. 365.3(a)(3)ii \_\_\_\_\_
- \_\_\_ altered the physical composition of a hazardous waste by altering containers. 365.3(a)(3)iii \_\_\_\_\_
- \_\_\_ The transporter has stored waste. \_\_\_\_\_
- \_\_\_ The transporter has stored hazardous waste temporarily at a transfer station not owned by him. \_\_\_\_\_
- Transporters as temporary storage facilities: \_\_\_\_\_
- \_\_\_ Wastes have remained in the unopened containers as received from generators. 365.3(a)(4)i \_\_\_\_\_
- \_\_\_ The containers are not handled or stored in a manner which may rupture the container or cause it to leak. 365.3(a)(4)ii \_\_\_\_\_
- \_\_\_ The transporter's vehicles have a gross vehicle weight rating of more than 10,000 pounds, and the transporter meet the financial security requirements. 365.3(b)(6)iv and 365.3(d)(3)iv \_\_\_\_\_
- \_\_\_ The insurer or surety is authorized to do business in NYS. 365.3(d)(3)i \_\_\_\_\_
- \_\_\_ The transporter's insurance has not expired. 365.3(d)(3)iii \_\_\_\_\_
- \_\_\_ \$5,000,000 \_\_\_\_\_
- \_\_\_ Policy form meets that set forth in Appendix I of NYS Part 365 regulations. 365.3(d)(3)v \_\_\_\_\_
- \_\_\_ 365.3(d) Has met requirements of hazardous waste discharges \_\_\_\_\_
- \_\_\_ 365.3(b)(7)ii Rail and water (bulk) must meet 365.7 \_\_\_\_\_
- \_\_\_ 365.3(b)(7)iii Delivery to transfer stations must meet 365.8 \_\_\_\_\_



Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

Company Contact or Official: \_\_\_\_\_ Inspected by: \_\_\_\_\_

Title: \_\_\_\_\_ Title: \_\_\_\_\_

County/City/Town/Village: \_\_\_\_\_ Organization/Region: \_\_\_\_\_

E/A Number: \_\_\_\_\_

Date/Time of Inspection: \_\_\_\_\_

Part 364 Permit Number \_\_\_\_\_

Instructions: Mark with an "X" only if a violation exists.

JUL 12 1983

Inspection of Hazardous Waste Disposal Inc. Facility

Stanley Siegel  
New York Hazardous Waste Section  
Solid Waste Branch

File

This memorandum shall serve as the inspection report summarizing the inspection of the subject facility, I.D. No. NYD037056132, on June 30, 1983. The site was inspected for the purpose of assessing the adequacy of closure activities performed at this facility. The nature of the inspection precluded the use of the standard inspection form.

Stanley Siegel of EPA and James Heil, Regional Solid Waste Engineer of Region I of the New York State Department of Environmental Conservation conducted the inspection.

The site was found to be clear of all containers, tanks, or other possible hazardous waste storage equipment. No activity appeared to be continuing at the site. There was no evidence of any soil contamination and in my estimation closure activities appeared to have been conducted in an environmentally sound manner. However, sub-surface conditions could not be assessed.

cc: PAB ✓

cc: Judith Meritz  
Office of Regional Counsel

JUN 25 1985

REGION /

JUL 19 1985

Major \_\_\_\_\_

Non-Major \_\_\_\_\_

1984

# COMPLIANCE INSPECTION REVIEW RECORD

1985

Corporate Handler's Name: Hazardous Waste Disposal, Inc.

Handler's Division Name: \_\_\_\_\_

EPA I.D. Number: N Y D 0 3 7 0 5 6 1 3 2

Part A Submitted? Yes ☐ No ☐ Part B Submitted? Yes ☐ No ☐

Annual Report(s) Submitted? Yes        No       

\_\_\_\_ Generator/Transporter for calendar year(s) \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

\_\_\_\_ Treatment, Storage & Disposal for calendar year(s) \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

Manifest Information Results:

Generation Rate: \_\_\_\_\_

For Small Quantity Generator, has letter been submitted to TSD? Yes      No     

Past Enforcement? Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what violations? \_\_\_\_\_

Inspection Findings and Questions: \_\_\_\_\_

Violations as a result of THIS inspection? Yes \_\_\_\_\_ No \_\_\_\_\_

Give Brief Description: Facility closed closed

Inspection made by E. P. A. / DEC.

Refr to memo - 7/11/87 - 14 hrs

[illegible]

Inspector Contacted? Yes ☐ No ☐ (Comments noted on back.)

### Recommendations:

## Thank You Letter

Correction/Clarification Letter (enforcement)

Warning Letter w/o \$25,000 paragraph (enforcement)

Warning Letter w/\$25,000 paragraph (enforcement)

Other (Explain below):

EXPLANATION: NO Further action

Date: . . . . .

Review Record Done By:

11.0

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA TRANSPORTER INSPECTION CHECKLIST

EX-113 3-6 PM '81  
ENVIRONMENTAL PROTECTION  
AGENCY  
JFK, N.Y. 10007

Transporter Name: H. J. ARDULL'S WASTE DISPOSAL, INC. EPA I.D.: NYT 000603894

Transporter Address: 11 A PIONEER BLVD. Driver: \_\_\_\_\_  
FARMINGDALE, N.Y.

CONTACT PERSON: M. GEORGE R. LAURENCE JR.  
THE PRESIDENT

	Yes	No
Does the transporter have an EPA I.D. number?	( X )	( )
Is the transporter carrying hazardous waste?	( X )	( )
Does the transporter have a manifest?	( X )	( )
Does the manifest show the following information:		
a. Name, address, I.D. of generator	( X )	( )
b. Name, address, I.D. of transporter	( X )	( )
c. Name, address, I.D. of designated facility	( X )	( )
d. Name of alternative facility	( )	( X )
e. DOT waste description	( X )	( )
f. Quantity of waste—volume, weight, number of containers	( X )	( )
g. Signed certification statement	( X )	( )
Does the manifest information confirm vehicle load?	( X )	( )
Is the vehicle placarded for hazardous waste?	( X )	( )

General comments:

THIS WAS NOT A FIELD BY SITE OR A CHECK  
BUT RATHER AN OFFICE TYPE INSPECTION.

Inspected by:

Date:

E. J. F. Smith  
George Launce  
Sept 2, 1981



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA TRANSPORTER INSPECTION CHECKLISTTransporter Name: Hazardous Waste Depot EPA I.D.: \_\_\_\_\_Transporter Address: Charminglyville Driver: \_\_\_\_\_

- |  | <u>Yes</u> | <u>No</u> |
|--|------------|-----------|
| 1. Does the transporter have an EPA I.D. number?             | (✓)        | ( )       |
| 2. Is the transporter carrying hazardous waste?              | (✓)        | ( )       |
| 3. Does the transporter have a manifest?                     | (✓)        | ( )       |
| 4. Does the manifest show the following information:         |            |           |
| a. Name, address, I.D. of generator                          | (✓)        | ( )       |
| b. Name, address, I.D. of transporter                        | (✓)        | ( )       |
| c. Name, address, I.D. of designated facility                | (✓)        | ( )       |
| d. Name of alternative facility                              | (✓)        | ( )       |
| e. DOT waste description                                     | (✓)        | ( )       |
| f. Quantity of waste-volume, weight,<br>number of containers | (✓)        | ( )       |
| g. Signed certification statement                            | (✓)        | ( )       |
| 5. Does the manifest information confirm vehicle load?       | (✓)        | ( )       |
| 6. Is the vehicle placarded for hazardous waste?             | (✓)        | ( )       |
| 7. General comments:   |            |           |

1A-C14flammable liquids NOS  
solvent mixtureInspected by: J. H. Smith  
Date: 8/21/81

RCRA GENERATOR INSPECTION FORM

COMPANY NAME:

HAZARDOUS WASTE DISPOSAL

EPA I.D. NUMBER: NYT 000603894

COMPANY ADDRESS: 11 A PICONE BLVD.

FARMINGDALE NY 11735

COMPANY CONTACT OR OFFICIAL:

MR. GEORGE R. LAWRENCE

INSPECTOR'S NAME:

TITLE: PRESIDENT

BRANCH/ORGANIZATION:

SOLID WASTE

CHECK IF FACILITY IS ALSO A TSD

FACILITY ☒

DATE OF INSPECTION: 9-2-81

YES

NO

DO  
KN

(1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste?  
Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (\$261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (\$261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (\$261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

NEW YORK STATE  
DEPARTMENT OF  
ENVIRONMENTAL  
CONSERVATION  
10007

YESNODON  
KNOW

- b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials? ✓ \_\_\_\_\_

Please explain: *ALTERNATE FUEL SUPPLIERS FROM WASTE OILS <sup>AND</sup> SOLVENTS.*

- c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

*1900 DRUMS (55-GAL) CONTAINING IGNITABLES AND NON-IGNITABLE. PLUS ONE 2500 GALLON ACID TANK.*

- d. Describe the activities that result in the generation of hazardous waste.

*RESIDUES FROM THE RECOVERY OF ALTERNATE FUEL.*

- (2) Is hazardous waste stored on site? ✓ \_\_\_\_\_

- a. What is the longest period that it has been accumulated?

*USUALLY 72 HOURS.*

- b. Is the date when drums were placed in storage marked on each drum? ✓ \_\_\_\_\_

*NOT ALL OF THEM. DRUMS ARE STORED UNPROTECTED FROM ELEMENTS WITHOUT AISLE SPACING. MOST DRUMS ARE CORRODED AND LEAKED. HOWEVER, THIS IS ALSO A STORAGE AREA.*

- (3) Has hazardous waste been shipped from this facility since November 19, 1980? ✓ \_\_\_\_\_

- a. If "yes," approximately how many shipments were made?

*A FEW TIMES PER WEEK*

- (4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980?

- a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made? ✓ \_\_\_\_\_

- b. If "no" or "don't know," please elaborate.

YES	NO	DON'T KNOW
-----	----	------------

c. Does each manifest (or a representative sample) have the following information?

- a manifest document number ✓
- the generator's name, mailing address, telephone number, and EPA identification number ✓
- the name, and EPA identification number of each transporter ✓
- the name, address and EPA identification number of the designated facility and an alternate facility, if any: ✓
- a description of the wastes (DOT) ✓
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle ✓
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA ✓

(5) Were there any hazardous wastes stored on site at the time of the inspection? ✓

a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? AN

*NO. DRUMS ARE CORRODED AND THEY LEAK. THERE IS INADEQUATE BERM AND INADEQUATE CONTAINMENT. RUNOFF IS VISIBLE (BUT NOT ENTERING) POTENTIAL TO ENTER & SEEMS TO EXIT IF HEAVY PRECIPITATION OCCURS.*

b. If not properly packaged or in secure tanks, please explain.

c. Are containers clearly marked and labelled? *NOT ALL OF THEM. SOME LABELS ARE INDISTINCT DUE TO LEAKS (SOLVENTS WASHED AWAY, PRINTS)* ✓

d. Do any containers appear to be leaking? ✓

*MAJORITY OF CONTAINERS ARE LEAKING*

e. If "yes," approximately how many?

*MAJORITY OF VISIBLE CONTAINERS WERE LEAKING*

*USED TO STORE*



\*(6) Has the generator submitted an annual report to EPA covering the previous calendar year? N/A

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? ✓

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments.

MANAGEMENT OF STORED DRUMS IS EXTREMELY POOR. CAN BE DESCRIBED AS A DISASTER AREA. THE WHOLE AREA IS CONTAMINATED WITH SOLVENTS AND OTHER CHEMICALS STORED IN DRUMS (DUE TO LEAKS). YOU CAN SEE ALL THE COLORS OF THE RAINBOW IN THE POOL OF LEAKED SOLVENTS THAT HAD ACCUMULATED IN THE CRACKS. THE STORAGE AREA IS INADEQUATELY DIKED BY A TWO INCH WIRE MESH TOP OF WHICH WOODCHIPS WERE PLACED. AT LEAST AN INCH OF LIQUID WASTES WERE CONTAINED BY THE BERM. LIQUID WASTES WERE VISIBLE AND WERE ESCAPING THE BERMED AREA AND HEADING IN THE DIRECTION OF A DRY WELL. THE OPENING OF THE DRY WELL WAS PROTECTED BY AN OIL RETAINING COLLAR. DRUMS WERE EXPOSED TO THE ELEMENTS, DENSELY CROWDED TOGETHER WITHOUT AISLE SPACE. THE STORAGE AREA IS A POTENTIAL FIRE HAZARD AND THE WASTES ARE IMPROPERLY STORED.

\* The effective date for this requirement is March 1, 1982.