CWA 2917 4a

3/30/1984

RCRA/WAC 173-303 DANGEROUS WASTE

COMPLIANCE CHECKLIST/QUESTIONNAIRE

FILE COPY

Industry name and address:

CHEMICAL PROCESSORS
5501 AIRPORT WAY S
SEATTLE WA

Date: 3-30-84

EPA/State Identification Number:

WAD000812917

County: KING Zip: 98108 Telephone: (206) 767-0350

Physical Location of Facility (if different than above):

PIER 91, SEATTLE, WA 98119

Facility Contact(s) Present During Inspection		
Name	Title	Phone No.
ROD WEST	PRESIDENT	767-0350
DAVE GATO	BOEING	575-7660

Inspected by:

CHARLES A GREGORY JR (Printed) 885-1900 (Phone Number)

I. Notification, Part A and Core Information

1. Notification filed: yes Date: 8-19-80
2. Part A application filed: yes Date: 11-14-80
3. Classified as:

Generator	X	Disposal facility	
Transporter		Transfer facility	
Treatment facility	X	Recycler	V oils
Storage facility	X	Other	

Comments:

USEPA RCRA
3012773

4. Have any changes in Notification or Part A been filed? no Date(s): _____

5. Does facility generate a solid waste(s) or receive a solid waste as defined by WAC 173-303-040? yes

6. Is this waste(s) designated under WAC 173-303, and not RCRA? potentially yes

7. Under what section, in WAC 173-303, are waste(s) designated?

a.	Discarded Chemical Products (081)	
b.	Dangerous Waste Sources (082)	X
c.	Dangerous Waste Mixtures (084)	X
d.	Toxic Dangerous Wastes (101)	X
e.	Persistent Dangerous Wastes (102)	X
f.	Carcinogenic Dangerous Wastes (103)	
g.	Dangerous Waste Characteristics (090)	
	(1) Ignitability	X
	(2) Corrosivity	X
	(3) Reactivity	
	(4) EP Toxicity	X

Remarks: _____

8. Dangerous Wastes listed on Part A application, or for generators, dangerous wastes generated.

	D.W. No.	Amount	Waste Description	Disposal Method
a.				
b.				
c.				
d.				
e.				
f.				
g.				

attach annual report when ~~report~~ received

9. Have these wastes been analyzed for determination of degree of hazard? yes

If so, by whom? Self, Cancho (used as verification of results)

10. Has facility petitioned, through RCRA 260.22 or WAC 173-303-910(3), to remove designation from a waste? no

If yes, explain:

11. This facility: [✓] Complies [ ] Does not comply with Interim Status Standards.

Comments: The paperwork & procedures used on site are excellent. The tank farm area has been concreted for ease of housecleaning. Most materials processed are oil-water or low concentration heavy metal contaminated water w/caustics from the cleaning of barges or oil tanks

Signature of Inspector: Charles A. Gregory

II. Standards Applicable to GENERATORS of Dangerous Waste - RCRA 262/WAC 173-303-170 to 230

	Yes	No
1. Does generator transport its own waste?		X
a. Is waste ever given to "outside" contractor? Have not hauled out sludge yet		X

EPA/State I.D. No: _____ _____
(Contractor(s))
Name and address: _____ _____

_____ _____

_____ _____

_____ _____

Note: (If facility transports own waste, look at standards applicable to transporters, section III)

2. Is generator following RCRA/WAC 173-303 manifest system?	X	
a. Is signature of, and date of acceptance by transporter obtained prior to transport?	X	
b. Does generator retain one copy of manifest in accordance with WAC 173-303-180(3), Manifest Procedures?	X	
c. Are manifests (signed by the generator, transporter, and designated disposal facility) kept for a minimum of three years (WAC 173-303-210(1))?	X	
3. Does generator operate a specific area for container handling or storage?		X

If yes, describe: _____

_____

NOT applicable

a. Does generator comply with the requirements set forth in WAC 173-303-200 governing on-site waste accumulation:		
(1) Labeling and marking		
(2) Dating		
(3) Inspections (must be done weekly for containers) WAC 173-303-630(8)?		

	Yes	No
b. Are incompatible wastes or other materials segregated?		X
4. Is entity familiar with Generator Reporting Procedures, (WAC 173-303-220)?	X	
a. Annual Reports (WAC 173-303-220(1))	X	
b. Exception Reports (WAC 173-303-220(2))	X	
c. Spills and Discharges into the Environment (WAC 173-303-145)	X	
5. Is generator aware of ~~and complying with~~ but not utilizing regulations concerning the preparation of Dangerous Waste for transport?		
a. Packaging: 49 CFR 173, 178, 179, and with requirements of UTC and WSP	X	
b. Labeling: 49 CFR 172	X	
c. Marking: 49 CFR 172	X	
d. Placarding: 49 CFR 172 Subpart F	X	

NOTE: Containers with $\leq$ 110 gallons of Dangerous Waste must be marked with the following or essentially equivalent, words and information, displayed in accordance with 49 CFR 172.304:

> DANGEROUS WASTE - State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the U.S. Environmental Protection Agency.
>
> Generator's Name and Address
>
> _____
>
> _____
>
> Manifest Document No. _____

Comments: _____

_____

_____

	Yes	No
6. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered (WAC 173-303-120)?		X
a. If yes, what are they? _____		
b. Do they exhibit any of the Dangerous Waste characteristics?	✓	
Note: If not, they are regulated.		
7. Does generator store dangerous waste over 90 days for either transport, treatment or disposal?	✓	
If yes, what are they? _____		
(if yes, go to IV, Standards for TSD Facilities)		
8. Does generator follow the operating procedures for containers as outlined in WAC 173-303-160, containers?	N/A	
i.e. Triple rinsing, resulting in less than 1% volume or 1 inch product remaining.		
9. Preparedness and Prevention (WAC 173-303-200(6)).		
a. Is an emergency communication system readily available in areas where wastes are stored or handled (WAC 173-303-340)?	✓	
b. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment readily available (WAC 173-303-340(1)(c))?	✓	
c. Have arrangements been made with local police, fire departments, and emergency response teams to familiarize them with the facility layout and the properties of the dangerous wastes handled (WAC 173-303-340(4))?	✓	

Comments: _____

	Yes	No
10. Contingency Plan and Emergency Coordinator (WAC 173-303-200(6)).		
a. Does the facility have a Contingency Plan which is designed to minimize the consequences of any unplanned release of Dangerous Waste (WAC 173-303-350)?	✓	
b. Does the facility have an Emergency Coordinator, and if so, their name Bob Woody		
c. Is this Emergency Coordinator, or his designee, familiar with the requirements stated in WAC 173-303-360, Emergencies?	✓	
d. Does contingency plan contain a list of all emergency equipment, its location(s), and a brief outline of its capabilities (WAC 173-303-350(3)(e))?	✓	
If not, explain:		
11. Personnel Training (RCRA 262.34(a)(5))		
a. Does facility have a training program that instructs facility personnel in such a way that ensures compliance with RCRA and WAC 173-303?	✓	
(1) Do facility personnel participate in an annual review of the training provided in the training program?	✓	
(2) Does the program include training in the following areas, where applicable?		
(a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.	✓	
(b) Key parameters for automatic waste feed cut-off systems.	N/A	
(c) Communications or alarm systems.	✓	
(d) Response to fire or explosions.	✓	
(e) Response to ground water contamination.	N/A	
(f) Shut down of operations.	✓	

	Yes	No
b. Does facility have a written training plan which includes the following documents and records:		
(1) For each position related to dangerous waste management; the job title, job description (including qualifications), and the name of the employee.	✓	
(2) A written description of the type and amount of both introductory and continuing training for that position.	✓	
(3) Records documenting that facility personnel have received and completed the training required by WAC 173-303-330.	✓	

Comments: _____

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N/A

III. Standards Applicable to TRANSPORTERS of Dangerous Waste, RCRA 263/WAC 173-303-240 to 270

	Yes	No
1. Does transporter have an EPA/state identification number?	____	____
2. Is transporter aware of, and complying with manifest requirements under RCRA 263.20 and WAC 173-303-180?	____	____
a. Before transporting a Dangerous Waste does transporter date and sign manifest?	____	____
b. Does transporter return a signed copy of manifest to generator?	____	____
c. Does transporter retain one copy of the manifest after delivery in accordance with WAC 173-303-260?	____	____
d. Does the transporter give the remaining copies of the manifest to the accepting transporter or designated disposal facility?	____	____
e. Does transporter obtain a signature of next transporter or designated facility?	____	____
f. Is the generator notified if the waste (or part of it) cannot be delivered to the assigned site?	____	____
g. Are manifests (signed by the generator, transporter, and designated disposal facility) kept for a minimum of three years (WAC 173-303-160(1))?	____	____

Comments: _____

	Yes	No
3. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in RCRA 263.30 and WAC 173-303-270, discharges during transport?	N/A	
a. Give notice to generator?		
b. Give notice to the National Response Center (800-424-8802) if required by 49 CFR 171.15?		
c. Report in writing, as required by 49 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. 20590.		

Comments: _____

RCRA/WAC 173-303 DANGEROUS WASTE

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IV. Standards Applicable to Dangerous Waste TREATMENT, STORAGE and DISPOSAL Facilities, WAC 173-303-280 to 395

	Yes	No
1. Has facility obtained an EPA/state identification number?	✓	
2. Are dangerous wastes accepted from "outside" sources (wastes not generated on site)?	✓	
a. If yes, has a chemical and physical analysis of a representative sample been obtained in accordance with RCRA 265.13 and WAC 173-303-300?	✓	
b. Does the facility confirm that each Dangerous Waste received at the facility matches the identity of the waste on the manifest?	✓	
3. Has facility obtained a detailed chemical, physical, and/or biological analysis of his waste prior to storing, treating, or disposing of it (WAC 173-303-300(2))?	✓	

Describe: Lab (self), Lauchs, Company has new GC capability

	Yes	No
4. Does the facility follow a Written Waste Analysis Plan containing:		
a. Parameters to be tested?	✓	
b. Methods of analysis?	✓	
c. Methods to obtain representative samples?	✓	
d. Testing frequency?	✓	

Comments:

	Yes	No
7. Has the facility a written inspection schedule (RCRA 265.15/WAC 173-303-320(2))?	✓	
a. Does it include inspecting all:		
Monitoring equipment?	✓	
Safety and emergency equipment?	✓	
Security devices?	N/A	
Detection equipment?	N/A	
Dangerous waste storage areas?	✓	
b. Is this inspection schedule maintained at the facility?	✓	
c. Is an inspection log maintained?	✓	
(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection?	✓	
8. Operating Record		
a. Does the owner/operator of the facility maintain an operating record at the facility (RCRA 265.73/ WAC 173-303-380))?	✓	
b. Does the record contain the following information:		
(1) A description of, and the quantity of each Dangerous Waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility?	✓	
(2) The location of each Dangerous Waste within the facility, and its quantity?	✓	
(3) A map showing disposal sites?	N/A	
(4) Summary reports and details of all incidents that require implementing the Contingency Plan?	N/A	

Comments: _____

Operating Record (Continued)	Yes	No
(5) Records and results of inspections as required by WAC 173-303-360(2)(d), General Inspection (need only be kept three years)?	✓	
(6) All closure ~~and post-closure~~ N/A cost estimates required for the facility?	✓	
(7) The results of testing and waste analysis?	✓	
9. Facility Reporting Procedures (WAC 173-303-390)		
a. Has the owner/operator prepared and submitted a single copy of the Annual Report to the WDOE by March 1 of each year?	✓	
(The report form and instructions in Facilities Report Form - Part B must be used for this report, and is available from the department.)		
b. Is owner/operator familiar with requirements for unmanifested reports, if applicable?	✓	
c. Is owner/operator familiar with procedures for emergencies (WAC 173-303-360(2))?	✓	
10. Closure and Post-Closure		
a. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility (RCRA 265.112)?	✓	
Does it contain the following:		
(1) A description of how and when the facility will be partialy closed (if applicable) and finally closed?	✓	
(2) An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility?	✓	
(3) A description of the steps needed to decontaminate the facility equipmnet during closure?	✓	

Comments: _____

	Yes	No

11. Financial Requirements (RCRA 265.140)

a. Has owner/operator prepared a written estimate of the cost of closing the facility in accordance with the closure plan (RCRA 265.112)? ✓ ____

(1) Is this cost estimate annually adjusted? ✓ ____

b. Has owner/operator established financial assurance for the closure of the facility (RCRA 265.143)? ✓ ____

(1) By what method has this been achieved:

a. Trust fund ✓
b. Surety bond ____
c. Letter of credit ____
d. Insurance ____
e. Financial test or corporate guarantee ____
f. Multiple mechanisms ____

if so, state methods used _____

_____

_____

(2) Has owner/operator submitted a copy of financial assurance to Regional Administrator (or WDOE)? ✓ ____

(3) Is wording of the financial assurance statement identical to that specified in

			Yes	No
RCRA 264.151	(a) (1)	Trust fund	✓	____
	(b)	Surety bond	____	____
	(c)	Letter of credit	____	____
	(d)	Insurance	____	____
	(e)	Financial test	____	____
	(f)	Corporate guarantee	____	____
265.143	(g)	Multiple Financial Mechanism	____	____

Note: (Ask for copy of assurance statement if department does not have one.)

c. Has the owner or operator of the Hazardous Waste treatment storage, or disposal facility obtained and maintained liability insurance for sudden occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million? ✓ ____

	Yes	No
d. Has the owner or operator of the Hazardous Waste treatment, storage, or disposal facility obtained and maintained liability insurance for nonsudden occurrences in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million?	N/A	

12. Financial Requirements for Post-Closure Care (RCRA 265.144) (Disposal Facilities Only) N/A

a. Has owner/operator prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (RCRA 265.144)?	____	____
(1) Is this cost estimate annually adjusted?	____	____
b. Has owner/operator established financial assurance for the post-closure care of the facility (RCRA 265.145)?	____	____

(1) By what method has this been achieved:

a. Trust fund ____
b. Surety bond ____
c. Letter of credit ____
d. Insurance ____
e. Financial test or corporate guarantee ____
f. Multiple mechanisms ____

if so, state methods used _____

_____

_____

Comments: _____

_____

_____

_____

_____

_____

_____

_____

	Yes	No
	N/A	
(2) Has owner/operator submitted a copy of financial assurance to Regional Administrator (or WDOE)?	____	____
(3) Is wording of the financial assurance statement identical to that specified in RCRA 264.151 (a) (1) Trust fund	____	____
(b) Surety bond	____	____
(c) Letter of credit	____	____
(d) Insurance	____	____
(e) Financial test	____	____
(f) Corporate guarantee	____	____
265.145 (g) Multiple Financial Mechanism	____	____
(4) Has owner/operator satisfied the financial assurance requirements by using a mechanism that takes into account both closure and post-closure care (RCRA 265-140)?	____	____

if so, state method(s) used _____

_____

Comments: _____

	Yes	No
13. Management of Containers (RCRA 265.170/WAC 173-303-630, Final Status)	N/A	
a. Are container storage areas inspected weekly for leaks and container deterioration (RCRA 265.174)?	____	____
b. If systems are uncovered, do they have positive drainage control and sufficient capacity to contain 110 percent of the volume of the largest container, (final status)?	____	____
c. If the facility stores EHW, is it protected from the elements by means of a building or other protected covering (final status)?	____	____
d. Are containers marked or labeled in a manner equivalent to 49 CFR 172 subpart E?	____	____

Comments: _____

	Yes	No

14. Tanks (RCRA 265.190)

a. Do tanks on the facility hold DW or EHW? ✓ ____

If so, what are their contents? oily waste H_2O, paint cleaning waste (phenol) emulsified oils, waste H_2O containing low levels of heavy metals

b. If applicable, are tanks protected from accelerated corrosion, erosion, or abrasion through the use of:

Inner liners	____	____
Coating	____	____
Other	✓	____

materials of construction

c. Are Dangerous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? ✓ ____

How:

Waste feed cut-off	____
Bypass system to another tank	____
High level alarm	____
Other Visual filling with two men	

d. Are tanks used for holding Dangerous Waste inspected on a routine basis (RCRA 265.194)?

For:

Overfilling equipment	N/A	once/day
Monitoring equipment	N/A	once/day
Tank integrity (above ground)	✓	once/week

e. Are tanks cleaned of all dangerous waste prior to being taken out of service or re-use? ____ ✓

Comments: Tanks are never out of service

	Yes	No
	N/A	

15. Surface Impoundments

a. Are the surface impoundments designed and operated to allow two feet of freeboard? _____ _____

If not, explain _____

_____

b. Is there a leachate detection, collection and removal system for impoundment? _____ _____

c. Does the surface impoundment contain a liner system to prevent discharge into the land during the life of the impoundment? _____ _____

If so, what type _____

_____

d. Are the surface impoundments so located to meet the buffer zone requirements of WAC 170-303-520? _____ _____

e. Are earthen dikes kept free of perennial woody plants and burrowing animals? _____ _____

f. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? _____ _____

g. Are the surface impoundments inspected on a routine basis? _____ _____

(1) Surface impoundments carrying free liquids _____ once/day

(2) Surface impoundments including dikes, berms, and vegetation _____ once/week

h. Are ignitable or reactive wastes held in a surface impoundment (RCRA 265.229)? _____ _____

Comments: _____

_____

_____

_____

_____

_____

	Yes	No
	N/A	

16. Waste Piles (RCRA 265.250)

a. Are dangerous wastes held in piles? _____ _____

If yes, describe _____

_____

b. Is the waste pile(s) designed to prevent wind or water dispersion (where applicable)? _____ _____

c. Is leachate or run-off dangerous per WAC 173-303? _____ _____

If so, what are its properties? _____

_____

(1) Is run-on diverted from waste pile(s)? _____ _____

(2) Do waste pile(s) have a containment system? _____ _____

(3) Does containment system consist of leachate and run-off collection and control system? _____ _____

If yes, describe: _____

_____

_____

(4) Is leachate treated and/or discharged via point source? _____ _____

How is it treated? _____

_____

_____

(5) Is the base of the pile lined or is it located on an impermeable base? _____ _____

d. Are ignitable, reactive, or incompatible wastes held in waste piles? _____ _____

If so, refer to RCRA 265.256 and 265.257.

Comments: _____

_____

_____

	Yes	No
		N/A

17. Land Treatment (RCRA 265.271/WAC 173-303-400(3)(iv))

a. Are dangerous wastes treated through land farming? _____ _____

If yes, describe: _____

_____

b. Has waste analysis been done (RCRA 265.13)? _____ _____

c. Is analytical data covering land farmed dangerous waste available? _____ _____

(1) Does this information include metals data relating to the EP toxicity test (RCRA 265.273(a))? _____ _____

d. Are all dangerous land farmed wastes treatable? _____ _____

e. Is run-on diverted away from the active portions of the land farm? _____ _____

f. Is run-off from active portions:

Collected? _____ Treated? _____

g. Are food chain crops grown on the land farm? _____ _____

If yes, describe: _____

_____

h. Are records kept which state application dates, rates, quantities, and location of each dangerous waste in the land farm? _____ _____

i. Does the owner/operator have a written and active unsaturated zone monitoring plan (RCRA 265.278)? _____ _____

(1) Does this plan:

(a) Detect the vertical migration of hazardous waste and hazardous waste constituents under the active portion of the land treatment facility? _____ _____

(b) Provide information on the background concentrations of the hazardous waste and hazardous waste constituents in similar but untreated soils nearby? _____ _____

	Yes	No
(2) Is the owner/operator familiar with the requirements of this plan set forth in RCRA 265.278?	N/A	

Comments:

	Yes	No
	N/A	

18. Landfills (RCRA 265.300/WAC 173-303-400(ii), also applies to waste piles used as a disposal site) ____ ____

a. Are dangerous wastes disposed of by landfill? ____ ____

If yes, describe: _____

_____

b. Is owner/operator familiar with WAC 173-303-400(3)(c)(ii)? ____ ____

"An owner/operator shall not landfill an organic carcinogen or an extremely hazardous waste, except at Hanford"

c. Is run-on diverted away from the landfill? ____ ____

d. Is run-off collected from the landfill? ____ ____

(1) Is run-off from the landfill a designated waste? ____ ____

If so, how is it treated? _____

_____

e. Is a detailed map of the fill maintained which identifies the location of the dangerous waste? ____ ____

f. Has the owner/operator reviewed closure/post-closure regulations (RCRA 265.310) e.g. final cover, erosion and infiltration control? ____ ____

g. If liquid wastes are placed in landfill, is the owner/operator fully aware of the requirements set forth in RCRA 265.314? ____ ____

Comments: _____

_____

_____

_____

_____

_____

_____

	Yes	No
	N/A	

19. Ground Water Monitoring (RCRA 265.90/ WAC 173-303-400(3)(c)(v))

a. Has the owner/operator implemented a ground water monitoring plan? ____ ____

b. Was this ground water monitoring plan implemented because the facility had:

(1) Surface impoundments? ____ ____

(2) Land treatment operations? ____ ____

(3) Landfills? ____ ____

(4) Other ____ ____

Describe: _____

_____

c. Does the ground water monitoring program consist of at least one upgradient and three downgradient wells? ____ ____

d. Has a written well monitoring program been developed (RCRA 265.92)? ____ ____

(1) At what frequency are samples collected for:

(a) Ground water quality ____ annually

(b) Ground water contamination ____ semiannually

e. May the department have a copy of your ground water monitoring plan? ____ ____

Comments: _____

	Yes	No
	N/A	

20. Incinerators (RCRA 265.340)

a. Are dangerous wastes disposed of via incinerators? _____ _____

b. Is the incinerator brought up to a steady state condition prior to adding waste? _____ _____

c. Are records of operation kept? _____ _____

d. How often is waste analysis conducted to verify that the waste feed to the incinerator is within the physical and chemical composition limits specified in the permit? _____

e. Does the owner/operator have a written inspection plan? _____ _____

. If so, does it include the following?

(1) Combustion controls _____ 15 minutes during incineration (RCRA 265.347(a)(1)).

(2) Temperature, wastefeed rate, airfeed rate _____ continuous.

(3) Plume _____ hourly.

(4) Complete incinerator and associated equipment _____ daily.

Comments: _____

	Yes	No
		N/A

21. Thermal Treatment (RCRA 265.370)

a. Do dangerous wastes undergo thermal treatment? ____ ____

If so, specify: _____

_____

b. Is the thermal treatment system brought up to a steady state condition using auxiliary fuel? ____ ____

c. Does the owner/operator have a written inspection schedule? ____ ____

d. Is the treatment unit inspected during operation in accordance with RCRA 265.377? ____ ____

Does he inspect the:

(1) Operating controls every 15 minutes? ____ ____

(2) Stack plume emissions every hour? ____ ____

(3) Complete unit daily? ____ ____

22. Underground Injection (RCRA 265.430/ WAC 173-303-400(c)(3)(iii) N/A

a. Are dangerous wastes disposed of via underground injection? ____ ____

If so, specify: _____

_____

b. Is the owner/operator familiar with the requirements set forth in RCRA 265.340 and Chapter 90.45 RCW, Water Pollution Control Act? ____ ____

Comments: _____

_____

_____

_____

_____

_____

_____