INSPECTOR: TEM MONTH/YEAR: 1, 90

DATE: 1-17-90 EPA ID: LAD010810314391

RCRA INSPECTION

G T D R

SITE NAME: Firestone Synthetic Rubber and Latex Co PHONE: 882-5375

MAILING ADDRESS: PO Box 1361 Lake Charles, La 70602

LOCATION: Hwy 108 south Rose Bluff PARISH: Calcasieu

HAZARDOUS WASTE FACILITIES (Type and Number)

STORAGE:

1 Container Storage Areas less than 90 day

1 Tanks T-29 less than 90 day

0 Waste Piles

0 Surface Impoundments

TREATMENT:

0 Tanks

0 Surface Impoundments

0 Incinerators

0 Other (Chem., Phys., Bio., or Thermal)

DISPOSAL:

0 Injection Wells

0 Landfills

0 Land Treatment

0 Surface Impoundments

0 Ocean Disposal

CHECKLISTS REQUIRED:

✓ RCRA CEI TSD Generator

___ GROUNDWATER

___ CLOSURE/POST CLOSURE

___ LAND TREATMENT (FARM)

✓ LAND BAN

Does this information agree with permit application? Yes N/A No ___

INSPECTOR(S): Theron Magers

PARTICIPANT(S): Mario Joves

INSPECTION REPORT TO EPA

DUE TO EPA ___

SENT TO EPA ___

VIOLATION RECOMMENDATION WORKSHEET

DEPARTMENT OF ENVIRONMENTAL QUA
OFFICE OF SOLID AND HAZARDOUS WA
HAZARDOUS WASTE DIVISION
POST OFFICE BOX 44307
BATON ROUGE, LOUISIANA 70804

Facility name: Firestone Synthetic Rubber + Latex Co
EPA ID #: LAD008083439
Parish: Calcasieu **City** Lake Charles
Dates of Inspection: Begin 1/17/90 **Other:**

Dates of Inspection: Begin 1/17/90 **Other**
Inspector(s): Theron Magers

violation	regulation #	repeat yes/no	vio class	evidence / specific findings
Failed to perform hazardous waste determination on labratory waste	LAC33:V.1103 ~~and 2245~~ and 2245.	yes / no	HPV MPU1 MPU2 LPU	lab waste is being added to slop oil (D001) which is all being burned ~~on~~ in boiler. No characterization of this waste has been conducted. Cited in 11-2-89 compliance order for same violation
Failed to manage properly excess accumulation in satellite accumulation areas	LAC33:V 1109:E. 5 + 6.	yes / no	HPV MPU1 MPU2 LPU	Containers storing hazardous waste in excess of 55 gallons without dates of accumulation (5 drums (D001) w/o accum. 2 drums (D001) stored > 3 days) containers with dates exceeded 3 days in storage. [illegible] satellite [illegible] 9 full drums (D001) [illegible]
Failure to maintain adequate aisle space	~~LAC33:V.1109.E.~~ ~~1.~~ and 2109.B.	yes / no	HPV MPU1 MPU2 LPU	drums stacked 4 deep. Labels cannot be read from access aisle. See photos.
Failure to amend hazardous waste notification form to indicate all hazardous waste generated on-site	LAC33:V.1105.B.	yes / no	HPV MPU1 MPU2 LPU	F003 + F005 not included on Notification Form D008 Not included if the company intends to continue using D008 for waste oil from API seperator - See Narrative) Cited in 11-2-89 compliance order for same violation
Failure to provide on the annual report all hazardous waste generated onsite and disposed offsite or recycled on site	LAC33:V.1111.B.	yes / no	HPV MPU1 MPU2 LPU	Annual report does not include waste slop oil (D001) and lab waste (F005) generated on site and recycled onsite. Cited in 11-2-89 compliance order to include in annual report and revise 1988 report accordingly. Not Done. F005 (paint waste also not on annual report, API Separator Oil (shown as being [illegible])
Failure to clean up spilled material in a timely manner	LAC33:V.1121	yes / no	HPV MPU1 MPU2 LPU	See photos. Spill in area of drum crusher. Cited in Compliance Order issued 11-2-89 for same violation in another area.
Respondent accumulated hazardous waste on site for greater than 90 days w/o approval of interim status & failed to mark w. date open within accumulation Program.	LAC 33:V.1109.E.1.	Yes / NO		One drum (F003, F005) paint waste stored greater than 90 days. One drum D001 with no date of accumulation. See Photos

D008

FIRESTONE SYNTHETIC RUBBER AND LATEX CO.
LAD 008083439
NARRATIVE

Firestone Synthetic Rubber and Latex Company manufactures synthetic rubber at their facility located on Hwy. 108 south of I-10 on the west side of Lake Charles, LA.

Hexane is used as a carrier for both styrene and butadiene. The two mixtures are mixed in a reactor to produce the raw rubber. The hexane does not enter into the reaction. After the reaction process, the hexane which contains small amounts of styrene and butadiene is recovered in a distillation column. The bottoms from column 209 (DOO1) are piped to tank T-29, and this slop oil is burned in one of two boilers (#5 and #6) equipped to receive this DOO1 waste. At the time of the inspection this slop oil was being burned in boiler #5.

Waste solvents generated from the lab (approximately 55 gal./month) are added to T-29 and burned along with the slop oil. Firestone has failed to do a proper hazardous waste determination on this lab waste, in violation of (1) LAC 33:V.1103 and ~~and 2245.~~ 2245.

Waste cement rubber (D001) is generated from the reactors. This waste is stored in 55 gallon drums in satellite accumulation areas near the reactors. One of these satellite areas contained 4 - 55 gallon drums, three of which were full, and only one had a proper hazardous waste label, but the date on this label was December 10, 1989 which was more than 3 days old. Another satellite area contained six (6) full drums, only three of which had proper labels indicating the words "hazardous waste" and the date which accumulation began. Two dates (1-14-90 and 1-16-90) were within three (3) days, but one (1), 1-10-90, was greater than three days. Mr. Mario Juves stated that the policy had been to put the dates on the drums when they first began to put waste into the drums, and not when the drums become full. Firestone has failed to manage their satellite accumulation areas in accordance with (1) LAC 33:V.1109.E.4, 5. and 6. These 55 gallon drums of D001 waste cement rubber are stored in their less than 90 day container storage area until offsite shipment to CWMI in Carlyss, LA for disposal.

The less than ninety (90) day container storage area had drums stacked four (4) deep making it impossible to inspect each container's identification label from the access aisle, in violation of (II) LAC 33:V.~~1109.E.1.~~ and 2109.B. Also, one drum of paint waste (F003) was stored [illegible] and one drum of D001 had no accumulation date, ~~in violation~~ in violation of LAC 33:V.1109.E.1.

The facility's HW-1 notification of hazardous waste activity form has been revised to indicate "burner" status for hazardous waste fuel in an industrial boiler, and the waste code F005 was removed. The less than ninety (90) day container storage area

RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

Note: On multiple part questions, circle those not in compliance.

Section A - EPA Identification NO.

1. Does Generator have EPA I.D. NO.? (262.12 - EPA I.D. No.) ✓ Yes ____ No

   a. If yes, EPA I.D. No. LAD 008013439 CLASS I

Section B - Hazardous Waste Determination

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste) 7.2 33:V.1103.

   a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste No.)

   (Provide waste name and description.) see attached annual report and Narrative ✓ Yes ____ No

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous waste.) 7.2b)1). 33:V.1103.B.1.

   a. If yes, list wastes and quantities on attachment. (Include EPA Hazardous Waste No.) (Provide waste name and description) D001 ✓ Yes ____ No

   b. Does generator determine characteristics by testing or by applying knowledge of processes? testing

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? ✓ Yes ____ No

      2. If equivalent test methods used, attach copy of equivalent methods used. copy attached

   c. Has generator determined nature of all waste? (7.2)1103. ____ Yes ✓ No Class I

3. Are there any other solid wastes deemed non-hazardous generated by generators? (i.e. process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.) 7.2 1103. ✓ Yes ____ No

   a. If yes, did generator determine non-hazardous charcteristics by testing or knowledge of process? testing

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? ✓ Yes ____ No

      2. If equivalent test methods used, attach copy of equivalent methods used.

   b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet.) Process wastewater, API sludges

4. Are any wastes recycled, reused or reclaimed on-site? ✓ Yes ____ No

   If yes, use narrative to describe the type and quantity of the waste and the method used for reclamation.

The facility generates spent solvents from the lab and distillation bottoms from the recovery of heptane from heptane, styrene, butadiene mixtures which are burned as boiler fuel.

Site Name: Firestone
I.D. Number: 439

5. Are any wastes shipped off-site for reclamation? ✓ Yes ___ No

If yes, use narrative to describe the type and quantity of the waste and its destination. Also give a description of storage prior to shipment.
API seperator oil sent to CWMI fuels program

Section C - Manifest See Annual Report

1. Does generator ship hazardous waste off-site? (Subpart B - The Manifest) ✓ Yes ___ No

   a. If no, do not fill out Section C and D.

   b. If yes, identify primary off-site facility(s). (Use narrative explanations sheet.) CWMI Carylss, La

2. Has generator shipped hazardous waste off-site since November 19, 1980? ✓ Yes ___ No

3. Is generator exempted from regulation because of:

   Small quantity generator (261.5 - Special requirements) ___ Yes ✓ No

   OR

   Produces non-hazardous waste at this time (261.4 - Exclusions) ___ Yes ✓ No

4. If not exempted does generator use manifest? (262.20 - General requirements) 7.4a)1) 1107.A.1. ✓ Yes ___ No

   a. If yes, does manifest include the following information (262.21 - Required information) (Break up items or circle ones not on manifest)

      1. Manifest Document No. 6.2a)1) & 7.4b) 903.A.1. & 1107.B. ✓ Yes ___ No
      2. Generators Name, Mailing Address, Tele. No. 903.A.2. & 1107.B. 6.2a)2) & 7.4b) ✓ Yes ___ No
      3. Generator EPA I.D. No. 6.2a)2), 6.6c), & 7.4b) 903.A.2., 911.C., & 1107.B. ✓ Yes ___ No
      4. Transporter(s) Name and EPA I.D. No. 6.2.2)3) & 6.6c) 903.A.2., 903.A.3., & 911.C. ✓ Yes ___ No
      5. a. Facility Name, Address and EPA I.D. No. 6.2a)4), 6.6c), & 7.4b) 903.A.4., 911.C., & 1107.B. ✓ Yes ___ No
      6. DOT description of the waste 6.2a)5) 903.A.5. ✓ Yes ___ No
      7. a. Quantity (weight or volume) ✓ Yes ___ No
         b. Containers (type and number) 6.2a)6) 903.A.6. ✓ Yes ___ No
      8. Emergency Information (~~[illegible]~~) 7.4a)4) 1107.A.4. (special handling instructions, Phone No.) ✓ Yes ___ No
      9. Waste minimization certification ✓ Yes ___ No

Site Name: FSRA
I.D. Number: H39

9. Is the following certification on each manifest form? 6.2b) & 7.4b)2) 903.B. & 1107.B.2. ✓ Yes ___ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

5. Does generator retain copies of manifests? 7.6a)1) 1111.A.1. ✓ Yes ___ No

(Check completed manifests at random. Indicate how many manifests were inspected, how many violations were noted and the type of violation.)

If yes, complete a through e. If questions contain more than one item, circle those not in compliance. (263.23 Use of the Manifest)

a. (1) Did generator sign and date all manifests inspected? 7.4d)1) 1107.D.1. ✓ Yes ___ No

b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter? 7.4d)1) 1107.D.1. ✓ Yes ___ No

c. Does generator retain one copy of manifest signed by generator and transporter? 7.4d)1) 1107.D.1. ✓ Yes ___ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? 6.3b)1) 905.B.1. ✓ Yes ___ No

e. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? (262.42 - Exception reporting) 7.6c)1111.C. NA Yes ___ No

(1) If yes, did it contain the following information: Legible copy of manifest. NA Yes ___ No

AND

Cover letter explaining generators efforts to locate waste. NA Yes ___ No

f. Does (will) generator retain copies for 3 years? 7.6a)1) 1111.A.1. ✓ Yes ___ No

Site Name: FSRPL
I.D. Number: H39

Section D - Pre-Transport Requirements

1. Does generator package waste? ✓ Yes ___ No

   If no, skip to question 9.
   If yes, complete the following questions.

Inspect containers ready for immediate shipment. If there are no such containers, skip to question 8.

2. Does generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) (262.30 - Packaging) 7.5a) 1109.A. ✓ Yes ___ No

3. Are containers to be shipped leaking or corroding or bulging? ___ Yes ✓ No
   Use narrative explanations sheet to describe containers and condition.

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172 when containers are offered for shipment? (262.31 - Labeling) 7.5b) 1109.B. ✓ Yes ___ No

5. Does the generator mark each package in accordance with 49 CFR 172 when containers are offered for shipment? (262.32 - Marking) 7.5c) 1109.C. ✓ Yes ___ No

6. a. Is each container of 110 gallons or less marked with the following label when containers are offered for shipment? ✓ Yes ___ No

   Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

   (in less than 90 day container storage areas)

   Generator's Name and Address _____

   _____

   Manifest Document Number _____

   b. If other labels exist, list in narrative.

7. If there are any vehicles present on-site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet. NA

8. Satellite Accumulation (effective June 20, 1985)

   a. Does the generator accumulate waste in containers at or near "satellite" generation points? ✓ Yes ___ No

   If no, skip to question 9.

   If yes, complete the following.

Site Name: FSR-PL
I.D. Number: 439

b. Are containers in good condition? ✓ Yes ___ No

c. Is the waste compatible with the containers? ✓ Yes ___ No

d. Is waste transferred from leaking containers or otherwise managed to control leakage? ✓ Yes ___ No

e. Are containers closed? ✓ Yes ___ No

* f. Are containers marked with the words "hazardous waste" or identification of the contents? ✓ Yes ___ No

* g. Has waste accumulation exceeded one (1) quart of acutely hazardous waste (261.33 e.) or 55 gallons of other hazardous waste? ✓ Yes ___ No

If yes,

1. Has the container holding the excess amount been marked with the date the excess began accumulating? ___ Yes ✓ No

2. Have excess amounts remained in the satellite accumulation area longer than three (3) days? ✓ Yes ___ No

9. Accumulation Time (262.34 - Accumulation Time)

a. Is the site a permitted/interim status storage facility? ___ Yes ✓ No
7.5e) 1109.E.
If yes, skip to Section E, and complete and attach the TSD checklist and appropriate supplemental checklists. If no, answer rest of question 19.

b. Is hazardous waste shipped offsite within 90 days? ✓ Yes ✓ No

c. Is waste stored in containers or tanks? Both ✓ Yes ___ No

d. Is the beginning date of accumulation time clearly indicated on each container? 7.5e)1) 1109.E.1. ___ Yes ✓ No

e. Is each container or tank marked with the words "Hazardous Waste"? 7.5e)1) 1109.E.1. ✓ Yes ___ No

f. Complete and attach the containers/tanks supplemental checklists as appropriate.

g. If generator accumulates waste on-site for less than 90 days, complete RCRA Generators Checklist Supplement.

Site Name: FSR&L
I.D. Number: 439

Section E - Recordkeeping and Reporting

1. Is generator keeping the following reports for a minimum of three (3) years? (262.40 - Recordkeeping)

   a. Manifests and signed copies from designated facilities? 1111.A.1. 7.6a)1) ✓ Yes ____ No

   b. Biennial reports (or reports as required by state agencies) 7.6a)2) 1111.A.2. ✓ Yes ____ No

   c. Exception Reports 7.6a)2) 1111.A.2. NA Yes ____ No

   d. Test results, where applicable. 7.6a)3) 1111.A.3. ✓ Yes ____ No

2. Where are records kept (at facility or elsewhere)? Facility

3. Who is in charge of keeping the records? Name Mario Juves Title environmental Mgr

Section F - Special Condition

1. Has generator received from or transported to a foreign source any hazardous waste? (262.50 - International Shipments) 7.7a) 1113.A. ____ Yes ✓ No

If yes, -

   a. Has a note been filed with the R.A.? NA ____ Yes ____ No

   b. Is this waste manifested and signed by Foreign Consignee? ____ Yes ____ No

   c. If generator transported wastes out of the country has he received confirmation of delivered shipment? ____ Yes ____ No

   d. Has the generator filed an annual report (by March 1 of each year) giving the type, quantity, frequency and destination of all exported hazardous waste? (Per HSWA 1984) 7.7a)2) 1113.A.2. ____ Yes ____

Section G - Spills

1. Is all spilled material or material trapped in sumps that is a hazardous waste or that will be disposed of as a hazardous waste cleaned up in a timely manner? 7.11 ____ Yes ✓ No

Site Name: [illegible]
I.D. no.: 439

RCRA GENERATORS CHECKLIST

SUPPLEMENT

Personnel Training 7.10

1. Have facility personnel successfully completed a program of classroom or on-the-job training? 9.8a)1) ✓ Yes ___ No

   a. Does the training program include instructions in the following:

   (1) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment 9.8a)3) ✓ Yes ___ No

   (2) key parameters for automatic waste feed cut-off systems 9.8a)3) ✓ Yes ___ No

   (3) operation of communication or alarm systems 9.8a)3) ✓ Yes ___ No

   (4) response to fires, explosions and groundwater contamination incidents 9.8a)3) ✓ Yes ___ No

   (5) shutdown of operations 9.8a)3) ✓ Yes ___ No

   (6) general hazardous waste management procedures ✓ Yes ___ No

   b. Is the program directed by a person trained in hazardous waste management procedures? 9.8a)2) ✓ Yes ___ No

   c. Have personnel completed annual training reviews? 9.8c) ✓ Yes ___ No

   d. Does the owner/operator maintain the following documents: 9.8d)

   (1) job title, job description and name of employee for each position at the facility related to hazardous waste management ✓ Yes ___ No

   (2) written description of the type and amount of both introductory and continuing training ✓ Yes ___ No

   (3) written documentation that the training has been completed by facility personnel ✓ Yes ___ No

Preparedness and Prevention

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and operation of facility) 9.9 ___ Yes ✓ No

If yes, use narrative explanations sheet to explain.

FSRPL
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2. Is the facility equipped with (265.32 - Required equipment)

   a. Internal communications or alarm system 9.6c)1) ✓ Yes ___ No
      1. Is it easily accessible in case of emergency? ✓ Yes ___ No

   b. Telephone or two-way radio to call emergency response personnel 9.6c)2) ✓ Yes ___ No

   c. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment 9.6c)3) ✓ Yes ___ No

      1. Is this equipment tested to assure its proper operation? ✓ Yes ___ No

   d. Water of adequate volume for hoses, sprinklers or water spray system 9.6c)4) ✓ Yes ___ No

      1. Describe source of water Fire water Pond

      2. Indicate flow rate and/or pressure and storage capacity, if available. ~~Not available~~ TBM
         500,000 gal reservoir 135 psi additional supply

3. Is there sufficient aisle space to allow unobstructed movement of personnel and emergency equipment?(265.35-Required Aisle Space) 9.6f) 2109B containers stacked 4 deep ___ Yes ✓ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with local authorities) 9.6g)1) La. Emergency Response
   Mutual Aid and CARE orginazations ✓ Yes ___ No

   If no, has the owner/operator attempted to make such arrangements? NA Yes ___ No

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with local authorities) 9.6g)1) ✓ Yes ___ No

   If yes, indicate primary authority Calcasieu Sheriff's Dept

   a. Is the fire department a city or volunteer fire department? Sulphur (City)

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers? 9.6g)1) ✓ Yes ___ No

   Are they readily available to the emergency coordinator? (265.37 - Arrangements with local authorities) ✓ Yes ___ No

I.D. No. [illegible] 439

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ✓ Yes ___ No
If no, has the owner/operator attempted to do this? (265.37 - Arrangements with local authorities) 9.6g) NA Yes ___ No

Part of CARE Program

8. If the State, or local authorities decline to enter into the above referenced agreements, has this situation been entered in the operating record? (265.37 - Arrangements with local authorities) ___ Yes ___ No

NA

Contingency Plan and Emergency Procedures 7.9

1. Does the facility have a contingency plan? (265.52 Content of Contingency Plan) 9.7a) ✓ Yes ___ No

   a. If yes, does it contain: 9.7b)

      1. actions to be taken in response to emergencies ✓ Yes ___ No
      2. description of arrangements with police, fire and hospital officials ✓ Yes ___ No
      3. list of names, addresses, phone numbers of persons qualified to act as emergency coordinator ✓ Yes ___ No
      4. list, including the location and physical description of all emergency equipment ✓ Yes ___ No
      5. evacuation plan for facility personnel including signals, primary and alternate routes ✓ Yes ___ No

2. Is a copy of the contingency plan maintained at the facility? (265.53 - copies of contingency plan) 9.7c)2) ✓ Yes ___ No

3. Has a copy been supplied local police, fire depts., and hospitals? (265.53 - Copies of contingency plan) 9.7c)2) ✓ Yes ___ No

4. Has the contingency plan been updated and amended as necessary? 9.7d) ✓ Yes ___ No

5. Is the plan a revised SPCC Plan? (265.52 - content of contingency plan) 9.7b)2) ✓ Yes ___ No

6. Is there an emergency coordinator on-site or within short driving distance of the plant at all times? 9.7e) ✓ Yes ___ No

   If yes, list primary emergency coordinator: Mario Juves

FSR+L

Site Name: ___
I.D. Number: ___
439

CONTAINERS STORAGE CHECKLIST
(Subpart I - Use and Management of Containers 265.170)

1. Does the facility store hazardous waste in containers?

   If no, do not complete this form. ✓ Yes ___ No

2. Are the containers in good condition? (check for leaks, corrosion, bulges, etc.) 23.60, 12.2

   If no, explain in narrative and document with photograph. ✓ Yes ___ No

3. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? 23.60 & 12.2 ✓ Yes ___ No

4. Is the waste compatible with the containers and/or its liner? 23.61 & 12.3 ✓ Yes ___ No

   If no, explain in narrative.

5. Are the stored containers closed? 23.62 & 12.4 ✓ Yes ___ No

   If no, explain in narrative.

6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? 23.62 & 12.4 ___ Yes ✓ No

   If yes, explain in narrative.

7. Are each of the containers inspected at least weekly? 23.63 & 12.5a) (daily) ✓ Yes ___ No

   If no, explain in the narrative the frequency of inspection.

8. Are containers holding ignitible or reactive wastes located at least 15 meters (50 feet) from the facility property line? 23.63 & 12.7 ✓ Yes ___ No

   If no, explain in narrative and document with photograph.

9. Are incompatible wastes stored in the same containers? 23.65 & 12.8 ___ Yes ✓ No

   If yes, explain in narrative.

10. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? 23.65 & 12.8 NA Yes ___ No

    If no, explain in narrative.

11. Is each container clearly marked with the date accumulation began and the words "Hazardous Waste"? [illegible]

Facility Name: FSRPL
EPA Id Number: 439

TANKS CHECKLIST

Effective July 14, 1986

Applicability (40 CFR 265.190)

1. Are tanks used to store or treat hazardous waste ? ✓ Yes ___ No

2. Complete the following table for all tanks.

Tank Identification	Location	New or Existing Tank	Date put into Service	Wastes Handled
T-29	Tank Farm	Existing	unknown	D001 (colop oil) F005 (lab waste)

Existing tank system (40 CFR 265.191)

1. Were any hazardous waste storage or treatment tanks constructed or put into service after July 14, 1986 ? ___ Yes ✓ No

If yes, complete 'New Tank System'.

If no, continue.

Effective January 12, 1988

2. Has the existing tank system's integrity been reviewed and certified by an independent, qualified registered professional engineer ? ___ Yes ✓ No

Inspector's Initials: [illegible]

Facility Name: FSR-PL
EPA Id Number: 439

TANKS CHECKLIST (cont'd)

If yes,

a. Did the assessment determine that the tank system is adequately designed (i.e. has sufficient structural strength and is compatible with the wastes to ensure that it will not collapse, rupture, or fail) ?

T.E.M. NA

___ Yes ___ No

Note: At a minimum, this assessment must consider the following:

a. design standard(s) according to which the tank and ancillary equipment were constructed.
b. hazardous characteristics of the waste(s) that have been and will be handled.
c. existing corrosion protection measures.
d. documented or estimated age of the tank system (if available).
e. results of leak test, internal inspections or other tank integrity examinations.

3. If the tank is non-enterable, did the assessment include a leak test ?

NA

___ Yes ___ No

Note: At a minimum, the assessment should include the effects of:

a. temperature variation;
b. tank end deflection;
c. vapor pockets; and
d. High water table.

4. Is this written assessment kept on file at the facility ?

T.E.M. NA

___ Yes ___ No

New Tank Systems (40 CFR 265.192)

NA

1. Has the integrity of the tank system been reviewed and certified by an independent, qualified registered professional engineer ?

___ Yes ___ No

2. Does the assessment include the following information:

a. design standards according to which tank(s) and/or ancillary equipment are constructed;

___ Yes ___ No

b. hazardous characteristics of waste(s) to be handled; and

___ Yes ___ No

Inspector's Initials: [illegible]

Facility Name: FSRPL
EPA Id Number: 439

TANKS CHECKLIST (cont'd)

NA

c. factors affecting potential for corrosion (for tanks in which external metal components of the tank will be in contact with soil) by a corrosion expert ? ___ Yes ___ No

Note: The factors affecting the potential for corrosion should include

1. Soil moisture content;
2. Soil pH;
3. Soil sulfides level;
4. Soil resistivity;
5. Structure to soil potential;
6. Influence of nearby underground metal structures (e.g. piping);
7. Existence of stray electric current;
8. Existing corrosion-protection measures (e.g. coating, cathodic protection); and
9. Type and degree of external corrosion protection.

d. was an analysis completed to determine that the underground tank system components will not be affected by vehicle traffic ? ___ Yes ___ No

e. was an analysis completed on the design considerations of each tank to ensure that the foundation will maintain a fully loaded tank and that system components are anchored to prevent flotation, dislodgment, or frost heave ? ___ Yes ___ No

3. Prior to covering the tank system, did an independent, qualified registered professional engineer inspect the tanks for the following:

a. weld breaks; ___ Yes ___ No

b. punctures; ___ Yes ___ No

c. scrapes of protective coating; ___ Yes ___ No

d. cracks; ___ Yes ___ No

e. corrosion; and ___ Yes ___ No

f. other structural damage or inadequate construction/installation ? ___ Yes ___ No

4. Were any components of the tank placed underground ? ___ Yes ___ No

Inspector's Initials: [illegible]

Facility Name: FSRPL
EPA Id Number: 439

TANKS CHECKLIST (cont'd)

If yes,

a. Was backfill material a non-corrosive, porous, homogeneous substance that has been installed and compacted to ensure that the tank and piping are supported ? NA ___ Yes ___ No

5. Was the tank and ancillary equipment tested for tightness prior to being covered, enclosed, or placed in use ? ___ Yes ___ No

Containment and Detection of Releases (40 CFR 265.193)

Note: For existing tanks storing F020-F023,F026-F027 (Dioxin Wastes), secondary containment is required within 2 years after Jan. 12, 1987. For all other existing tank systems secondary containment systems are required by Jan. 12, 1989 or 15 years from the date the tank was installed, whichever comes later.

1. Are any tanks situated inside a building with an impermeable floor ? ___ Yes ✓ No

If yes,

a. Do these tanks contain hazardous waste with free liquids (265.190 (a)) ? ___ Yes NA No

b. Was the Paint Filter Liquid Test used to demonstrate the absence or presence of free liquids (265.190 (a)) ? NA Yes ___ No

2. Are any tanks part of a secondary containment system used to collect or contain releases of hazardous wastes ? ___ Yes ✓ No

Note: If **#1 or #2 are yes**, then 265.193 of this **checklist is not** applicable for these tanks.

3. Does the tank have a secondary containment system ? ✓ Yes ___ No

4. Is the secondary containment system constructed of or lined with materials compatible with the wastes ? ✓ Yes ___ No

5. Does the secondary containment system have a leak-detection system ? ✓ Yes ___ No

tank is supported above grade

Inspector's Initials: [illegible]

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TANKS CHECKLIST (cont'd)

If yes,

a. Is the leak-detection system capable of detecting failure of the secondary containment or presence of releases of hazardous wastes within 24 hours ? ✓ Yes ___ No

6. Is the secondary containment system sloped and designed to drain and remove liquids resulting from leaks, spills, or precipitation ? ✓ Yes ___ No

a. Are spills removed from the secondary containment system within 24 hours ? ✓ Yes ___ No

7. If the answer to #3 and #4 is no, was the Regional Administrator notified that spill clean-up can not be accomplished within 24 hours ? NA ___ Yes ___ No

8. Does the secondary containment system include one (or more) of the following devices:

a. Liner (External to the tank); ✓ Yes ___ No

If yes, is it:

i. Designed or operated to contain 100 percent of the capacity of the largest tank ? ✓ Yes ___ No

ii. Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system (unless the collection system is sufficient) ? ✓ Yes ___ No

iii. Free of cracks or gaps ? Expansion joints + smaller cracks ✓ Yes ___ No

iv. Designed and installed to completely surround the tank and to cover all surrounding earth likely to come in contact with the waste (if released) ? ✓ Yes ___ No

b. Vault; ___ Yes ✓ No

If yes, is it:

i. Designed or operated to contain 100 percent of the capacity of the largest tank ? NA ___ Yes ___ No

ii. Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system (unless the collection system is sufficient) ? ___ Yes ___ No

Inspector's Initials: [illegible]

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TANKS CHECKLIST (cont'd)

iii. Constructed with chemical-resistant water stops in place at all joints (if any) ?

iv. Provided with an impermeable interior coating or lining that is compatible with the stored waste ? NA ___ Yes ___ No

v. Provided with a means to protect against the formation of and ignition of vapors within the vault ? NA ___ Yes ___ No

c. Double-walled tank; and ___ Yes ✓ No

If yes, is it:

i. Designed as an integral structure so that any release from the inner tank is contained by the outer shell ? NA ___ Yes ___ No

ii. Protected (if constructed with metal) from both corrosion of the primary tank interior and the external surface of the outer shell ? ___ Yes ___ No

iii. Provided with a built-in leak detection system capable of detecting a release within 24 hours or earliest practical time ? ___ Yes ___ No

d. An equivalent device approved by the Regional Administrator ? ___ Yes NA No

9. Is the ancillary equipment provided with a secondary containment system (e.g. trench, jacketing, double-walled piping) ? ✓ Yes ___ No

10. Has the owner/operator obtained a secondary containment variance from the Regional Administrator ? ___ Yes ✓ No

General Operating Requirements (40 CFR 265.194)

1. Is there evidence that hazardous waste has caused a tank or ancillary equipment to rupture, corrode, or cause leakage of the tank or ancillary equipment ? ___ Yes ✓ No

2. Does the owner/operator use appropriate controls and practices to prevent spills and overflows from the tank or secondary containment system (i.e. spill prevention controls, maintenance of freeboard) ? ✓ Ye ___ No

Inspector's Initials: [illegible]

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TANKS CHECKLIST (cont'd)

Inspections (40 CFR 265.195)

1. Does the owner/operator inspect the following at least daily: yes

   a. overfill/spill control equipment; ✓ Yes ___ No

   b. aboveground portions of tank system (if applicable) to detect corrosion or releases of waste; ✓ Yes ___ No

   c. data gathered from monitoring and leak detection equipment to ensure that the tank is being operated according to design; and ✓ Yes ___ No

   d. construction materials and the area immediately surrounding the external accessible portions of tank system ? ✓ Yes ___ No

2. Have cathodic protection systems been inspected and confirmed to be working properly within 6 months after initial installation and annually thereafter ? NA ___ Yes ___ No

3. Are all sources of impressed current inspected and/or tested at least bimonthly ? NA ___ Yes ___ No

4. Is this information documented in the operating record ? ✓ Yes ___ No

Response to Leaks/Spills and Disposition of Leaking or Unfit for Use Tank Systems (40 CFR 265.196)

1. Have any tank systems or secondary containment systems had a leak or spill, or been determined to be unfit for use ? ___ Yes ✓ No

If no, go to Closure Section of this checklist.

If yes,

   a. Was the flow restricted from entering the tank system or secondary containment system ? NA ___ Yes ___ No

   b. Was a visual inspection conducted and were measures taken to prevent further migration of the leak or spill onto soil/surface water ? ___ Yes ___ No

   c. What was the type and quantity of waste spilled ? ___ Yes ___ No

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TANKS CHECKLIST (cont'd)

d. Was the spill contained and cleaned immediately ? ___ Yes NA No

2. Were all spills of greater than one pound of hazardous waste which were not immediately contained and cleaned up reported to the Regional Administrator within 24 hours ? NA ___ Yes ___ No

3. Have there been any releases to the environment ? ___ Yes NA No

If yes,

a. Has the owner/operator made the appropriate report to the Regional Administrator ? NA ___ Yes ___ No

4. Was the release to the environment from a component of a tank system which had no secondary containment ? ___ Yes NA No

If yes,

a. Was secondary containment provided prior to returning that component to service ? NA ___ Yes ___ No

5. Has the owner/operator made extensive repairs to the tank system ? ___ Yes ~~NA~~ ✓ No

If yes,

a. Has a certification from an independent, qualified registered professional engineer stating that the repaired system is capable of handling hazardous wastes without releases for the intended life of the system ? NA ___ Yes ___ No

b. Has this certification been sent to the Regional Administrator within 7 days after returning the tank system to use ? NA ___ Yes ___ No

Closure and Post-Closure Care (40 CFR 265.197)

1. Does the closure plan address the closure of all tanks and ancillary equipment ? NA ___ Yes ___ No

[In addition, the Closure Checklist must be completed.]

No Closure/Post Closure plan required.

Inspector's Initials: [illegible]

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TANKS CHECKLIST (cont'd)

Special Requirements for Ignitable or Reactive Wastes (40 CFR 265.198)

1. Have ignitable or reactive wastes been placed in tank systems ? ✓ Yes ___ No

If yes,

a. Has the waste been treated, rendered, or mixed before or immediately after placement in tank systems to no longer meet the definition of ignitable or reactive waste; ___ Yes ✓ No

OR

b. Has the waste been stored or treated such that it is protected from any material or condition that might cause it to ignite ? ✓ Yes ___ No

OR

c. Is the tank used solely for emergencies ? ___ Yes ✓ No

d. Does the tank meet the distance requirements from public ways (streets, alleys, adjoining property line) according to the chart in Table 2-1 through 2-6 of the National Fire Protection Association ? ✓ Yes ___ No

Special Requirements for Incompatible Wastes (40 CFR 265.199)

1. Are incompatible wastes placed in tank systems ? ___ Yes ✓ No

If yes,

a. Are wastes handled in such a way as to generate extreme heat, pressure, fire, explosion, violent reaction or any means to threaten human health or the environment ? NA ___ Yes ___ No

2. Has the tank been decontaminated prior to placing an incompatible waste in it ? NA ___ Yes ___ No

Inspector's Initials: TEM

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TANKS CHECKLIST (cont'd)

Waste Analysis and Trial tests (40 CFR 265.200)

1. Does the owner/operator conduct waste analyses and trial treatment or storage tests when the tank system is used to store or treat a hazardous waste which differs from the previous waste ? NA

___ Yes ___ No

2. Did the owner/operator obtain written, documented information on similar waste under similar operating conditions to show that the proposed treatment or storage will meet general operating requirements ? NA

___ Yes ___ No

Small Quantity Generators (SQG) (40 CFR 265.201)

1. Does the owner/operator generate between 100 and 1000 kg of hazardous waste per month ?

___ Yes ✓ No

If no, do not complete this section.

If yes,

a. Does the operator take precautions to prevent accidental ignition or reactions of ignitable or reactive wastes ? NA

___ Yes ___ No

b. Have hazardous wastes or treatment reagents caused the tanks or inner liner to rupture, leak, or corrode ?

___ Yes ___ No

c. Does the tank have at least 60 cm of freeboard, unless the tank is equipped with a containment structure ?

___ Yes ___ No

d. Are wastes stored in tanks greater that 180 days ?

___ Yes ___ No

If yes,

i. Is the disposal site greater than 200 miles ?

___ Yes ___ No

If no,

ii. Has the owner/operator applied for interim status ?

___ Yes ___ No

e. Are wastes stored in tanks greater than 270 days ?

___ Yes ___ No

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TANKS CHECKLIST (cont'd)

If yes,

i. Has the owner/operator applied for interim status ? NA ___ Yes ___ No

f. Does the tank have an automatic waste feed cutoff system or stand-by tank to stop inflow ? NA ___ Yes ___ No

g. Does the generator inspect the tanks for the following conditions:

i. discharge control equipment; TEM ___ Yes ___ No

ii. data gathered from monitoring equipment at least once each operating day to ensure that the tank is being operated according to design; and TEM ___ Yes ___ No

iii. Level of waste in tank ? TEM ___ Yes ___ No

h. Construction materials and immediate surrounding area to detect leaks ? TEM ___ Yes ___ No

i. Corrosion of tank ? TEM ___ Yes ___ No

2. Are reactive or ignitable wastes being stored in tanks ? TEM ___ Yes ___ No

If yes, complete Special Requirements for Ignitable or Reactive Wastes Section of this checklist.

Inspector's Initials: [illegible]

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LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form A - Restricted Waste Determination

Note: This form must be completed during all RCRA Compliance Evaluation Inspections (CEIs). Additional forms (B through F) may be required depending on types of wastes generated or handled.

Section I. Wastes restricted on November 7, 1986 (F-solvents and Dioxins)

Check each box that applies (see Appendix A):

☐	F001	☐	F004	☐	F021	☐	F026
☐	F002	☑	F005	☐	F022	☐	F027
☑	F003[1]	☐	F020	☐	F023	☐	F028

☐ None of the wastes listed above are handled by the generator. Complete Section II of this form.

☑ One or more of the wastes listed above are handled by the generator. Complete Form C - Manifesting Restricted Wastes and Form D - Testing and Management of F-solvents and Dioxins.

[1] Applicable only if waste is ignitable.

Section II. Wastes restricted on July 8, 1987 (California List)

Check each box that applies:

☐ Liquid hazardous wastes or liquids associated with solids or sludges containing free cyanides at concentration greater than 1000 mg/L.

☐ Liquid hazardous wastes or liquids associated with solids or sludges containing one or more of the following concentrations:

- ☐ Arsenic or compounds containing arsenic greater than 500 mg/L;
- ☐ Cadmium or compounds containing cadmium greater than 100 mg/L;

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Form A - Restricted Waste Determination (cont'd)

- ☐ Chromium or compounds containing chromium greater than 500 mg/L;
- ☐ Lead or compounds containing lead greater than 500 mg/L;
- ☐ Mercury or compounds containing mercury greater than 20 mg/L;
- ☐ Nickel or compounds containing nickel greater than 134 mg/L;
- ☐ Selenium or compounds containing selenium greater than 100 mg/L; or
- ☐ Thallium or compounds containing Thallium greater than 130 mg/L.

☐ Liquid hazardous wastes exhibiting a pH less than or equal to 2.0.

☐ Liquid hazardous wastes that also contain polychlorinated biphenols (PCBs) at concentrations between 50 to 500 mg/L.

☐ Liquid or nonliquid hazardous waste containing halogenated organic compounds at concentrations greater than or equal to 1000 mg/Kg.

☑ **None of the wastes listed above are handled by the generator.** Complete Section III of this form.

☐ **One or more of the wastes listed above are handled by the generator.** Complete Form C - Manifesting Restricted Wastes and Form E - Testing and Management of California List Wastes.

Section III. Wastes restricted on August 8, 1988 (First Third List)

1. Hard Hammer Wastes (see Appendix B)

B. All others

☐ F006[1]	☐ K001	☐ K004[1]	☐ K008[1]
☐ K015	☐ K016	☐ K018	☐ K019
☐ K020	☐ K021[1]	☐ K022[1]	☐ K024
☐ K025[1]	☐ K030	☐ K036[1]	☐ K037

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Form A - Restricted Waste Determination (cont'd)

☐ K044	☐ K045	☐ K046[1]	☐ K047
☐ K048[2]	☐ K049[2]	☐ K050[2]	☐ K051[2]
☐ K052[2]	☐ K060[1]	☐ K061[1]	☐ K062
☐ K069[1]	☐ K071	☐ K083[1]	☐ K086[3]
☐ K087	☐ K099	☐ K100[1]	☐ K101[4]
☐ K102[4]	☐ K103	☐ K104	

[1] Nonwastewaters only, wastewaters have been soft hammered.
[2] National Capacity Extension through May, 1990.
[3] Solvent-wash subcategory, other subcategories have been soft hammered.
[4] All wastewaters and nonwastewaters with less than 1% total As, high As wastewaters have been soft hammered.

2. Soft Hammer Wastes (see Appendix C)

A. Wastewaters only

☐ F006	☐ K004	☐ K008	☐ K021
☐ K022	☐ K025	☐ K036	☐ K046
☐ K060	☐ K061	☐ K069	☐ K083
☐ K086	☐ K100	☐ K101	☐ K102

B. All others

☐ F007	☐ F008	☐ F009	☐ F019
☐ K011	☐ K013	☐ K014	☐ K017
☐ K031	☐ K035	☐ K036	☐ K069
☐ K073	☐ K083	☐ K084	☐ K085
☐ K086	☐ K101[1]	☐ K102[1]	☐ K106

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Form A - Restricted Waste Determination (cont'd)

☐	P001	☐	P004	☐	P005	☐	P010
☐	P011	☐	P012	☐	P015	☐	P016
☐	P018	☐	P020	☐	P030	☐	P036
☐	P037	☐	P039	☐	P041	☐	P048
☐	P050	☐	P058	☐	P059	☐	P063
☐	P068	☐	P069	☐	P070	☐	P071
☐	P081	☐	P082	☐	P084	☐	P087
☐	P089	☐	P092	☐	P094	☐	P097
☐	P102	☐	P105	☐	P108	☐	P110
☐	P115	☐	P120	☐	P122	☐	P123
☐	U007	☐	U009	☐	U010	☐	U012
☐	U016	☐	U018	☐	U019	☐	U022
☐	U029	☐	U031	☐	U036	☐	U037
☐	U041	☐	U043	☐	U044	☐	U046
☐	U050	☐	U051	☐	U053	☐	U061
☐	U063	☐	U064	☐	U066	☐	U067
☐	U074	☐	U077	☐	U078	☐	U086
☐	U089	☐	U103	☐	U105	☐	U108
☐	U115	☐	U122	☐	U124	☐	U129
☐	U130	☐	U133	☐	U134	☐	U137
☐	U151	☐	U154	☐	U155	☐	U157
☐	U158	☐	U159	☐	U171	☐	U177

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Form A - Restricted Waste Determination (cont'd)

☐ U180	☐ U185	☐ U188	☐ U192
☐ U200	☐ U209	☐ U210	☐ U211
☐ U219	☐ U220	☐ U221	☐ U223
☐ U226	☐ U227	☐ U228	☐ U237
☐ U238	☐ U248	☐ U249	

[1] Nonwastewaters with greater than 1% As.

☑ None of the wastes listed above are handled by the generator. Complete Section VI of this form.

☐ One or more of the wastes listed above are handled by the generator. Complete Form C - Manifesting Restricted Wastes and Form F - Testing and Management of First Third List Wastes.

Section IV. Wastes restricted on June 8, 1989 (Second Third)

Section V. Wastes restricted on May 8, 1990 (Last Third)

Section VI. BDAT Treatability Group - Treatment Standards Identification.

1. Does the generator mix restricted wastes which have different treatment standards ? ✓ Yes ___ No

   If yes, Lab waste solvents are mixed with Distillation bottoms (D001) and burned in boiler

   A. Did the generator select the most stringent treatment standard ? NA Yes ___ No

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LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form B - Treatment, Storage and Disposal

Note: This form should be completed only if the generator or handler stores restricted wastes onsite for greater than 90 days or operates RCRA-regulated treatment or disposal units. Small quantity generators who accumulate restricted wastes for less than 180(270) days are exempt from the following requirements.

less than 90 day storage

Section I. General facility standards

NA

1. Has the facility's waste analysis plan been revised in accordance 264.13(b)(6) or 265.13(b)(6) to reflect requirements under 268.7 ? ___ Yes ___ No

2. Has the facility obtained representative chemical and physical analysis of wastes and residues in accordance to 264.13 or 265.13 ? ___ Yes ___ No

   if yes,

   A. Chemical and physical analyses of F-solvents and Dioxins

      i. Has testing included analyses for all F-solvent constituents ? ___ Yes ___ No

      ii. Were all F-solvent constituents analyzed by employing the Toxicity Characteristic Leaching Procedure (TCLP) ? ___ Yes ___ No

   B. Chemical and physical analyses of California List wastes

      i. Were the following analyses conducted on California List wastes:

         a. pH ? ___ Yes ___ No

         b. Concentrations of PCBs ? ___ Yes ___ No

         c. Concentration of Halogenated Organic Compounds ? ___ Yes ___ No

         d. Heavy Metal concentration ? ___ Yes ___ No

         e. Cyanide concentration ? ___ Yes ___ No

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Form B - Treatment, Storage and Disposal (cont'd)

C. Chemical and physical analyses of First Third List Wastes

i. Has the facility tested wastes with established treatment standards (hard hammer wastes) ? ___ Yes ___ No

N/A

if yes,

a. List these wastes and the test procedures used to determine concentrations below:

_____

_____

_____

3. Were these analyses conducted onsite or offsite ? _____

A. If offsite, identify lab: _____

4. Describe the frequency of sampling restricted wastes below:

_____

_____

Attach copy of most recent waste analysis.

_____

Section II. Storage of Restricted Wastes

1. Have restricted wastes exceeding treatment standards been stored ? ___ Yes ___ No

if yes,

A. Have all containers been clearly marked to identify contents and date(s) entering storage ? ___ Yes ___ No

B. Do operating records track location, quantity, and dates that restricted wastes entered and were removed from storage ? ___ Yes ___ No

C. Do records agree with container labeling ? ___ Yes ___ No

D. Are restricted wastes stored for less than 1 year ? ___ Yes ___ No

E. Have tanks been emptied at least once per year, and do operating records show that volumes of restricted wastes removed from tanks at least equal tank volume ? ___ Yes ___ No

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Form B - Treatment, Storage and Disposal (cont'd)

NA

F. Have restricted wastes been stored for more than one year ? ___ Yes ___ No

i. If yes, can the owner/operator demonstrate that the purpose of such storage has been solely conducted for accumulating sufficient quantities of restricted wastes to facilitate proper recovery, treatment, or disposal ? ___ Yes ___ No

---

Section III. Storage or treatment in surface impoundments

1. Have restricted wastes exceeding treatment standards been placed in surface impoundments ? ___ Yes ___ No

   A. If yes, have these wastes and their residues been removed at least annually ? ___ Yes ___ No

   B. If no, skip the remainder of this section.

2. Have these wastes been placed for treatment ? ___ Yes ___ No

   A. If yes, describe treatments processes below:

   _____

   _____

   _____

3. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both ? ___ Yes ___ No

4. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency ? ___ Yes ___ No

5. Have minimum technology requirements been met ? ___ Yes ___ No

   A. If no, have waivers been granted for each restricted waste management unit ? ___ Yes ___ No

6. Have all 264/265 Subpart F groundwater monitoring requirements been met ? ___ Yes ___ No

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Form B - Treatment, Storage and Disposal (cont'd)

NA

7. Have representative samples of sludge and supernatant from applicable surface impoundments been tested adequately and in accordance with sampling frequency and analysis specified in the waste analysis plan ? ___ Yes ___ No

   A. Are test results maintained in the operating record ? ___ Yes ___ No

   B. Did hazardous waste residues (i.e. sludge or liquid) exceed treatment standards as specified in 268.41 ? ___ Yes ___ No

   C. Provide the frequency of analyses conducted on treatment residues below:

   ___

   ___

   ___

   D. Do operating records adequately document results of waste analyses performed in accordance with 268.41 ? ___ Yes ___ No

8. Has supernatant been determined to exceed treatment standards ? ___ Yes ___ No

   A. If yes, is annual throughput greater than surface impoundment volume ? ___ Yes ___ No

9. If residues were removed annually, have adequate precautions been taken to protect liners and do records indicate that inspections of liner integrity are performed ? ___ Yes ___ No

10. When removed, were solvent wastes managed subsequently in another surface impoundment ? ___ Yes ___ No

11. When removed, were wastes treated prior to disposal ? ___ Yes ___ No

   A. If yes, are waste residues treated onsite or offsite ? ___

   B. Describe management method below:

   ___

   ___

   ___

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Form B - Treatment, Storage and Disposal (cont'd)

Section IV. RCRA-regulated Treatment (not including surface impoundments

NA

1. Did the facility operate treatment facilities for restricted wastes ? ___ Yes ___ No

   If no, skip the rest of Section IV.

2. Describe processes for each restricted waste treated onsite:

   _____

   _____

   _____

3. Does the facility treat soft hammer wastes ? ___ Yes ___ No

   If yes,

   A. Is treatment occurring as described in the facility's certification/demonstration ? ___ Yes ___ No

   B. Did the treatment facility certify all soft hammer waste as per the facility's demonstration and maintain copies of all certifications ? ___ Yes ___ No

   C. Did the facility send a copy of the demonstration and certification to the receiving treatment, recovery, or storage facility ? ___ Yes ___ No

4. Does the treatment facility test the treatment residuals in accordance with an acceptible waste analysis plan ? ___ Yes ___ No

5. Do treatment residuals exceed treatment standards ? ___ Yes ___ No

   If yes,

   A. Describe processes used to handle those residuals ?

   _____

   _____

   _____

   B. Describe the frequency of testing of treatment residuals below:

   _____

   _____

   _____

6. Was dilution used as a substitute for treatment ? ___ Yes ___ No

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Form B - Treatment, Storage and Disposal (cont'd)

NA

7. Are certifications and results of waste analyses kept in the operating record ? ___ Yes ___ No

If any treatment residuals were shipped offsite for further treatment or disposal, complete Form C - Manifesting Restricted Wastes.

Section V. Land Disposal

1. Were restricted wastes placed in land disposal units (i.e. surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers) for other than treatment purposes ? ___ Yes ___ No

2. Did the facility have appropriate notices or certifications from generators or treatment facilities in its operating record [268.7(a-b)] ? ___ Yes ___ No

3. Did the facility obtain waste analyses of restricted wastes to determine if such wastes were in compliance with applicable treatment standards [268.7(c)] ? ___ Yes ___ No

4. Were restricted wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units excluding national capacity variances ? ___ Yes ___ No

   If yes,

   A. Did the facility have an approved waiver based on "no migration" petition, approved case-by-case, capacity extension, or treatment standard variance ? ___ Yes ___ No

5. Were restricted wastes, subject to national or case-by-case capacity variances or extensions, disposed ? ___ Yes ___ No

   If yes,

   A. Were these wastes disposed of in a hazardous waste management unit that meets minimum technology requirements ? ___ Yes ___ No

6. Are adequate records of disposal maintained ? ___ Yes ___ No

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Form B - Treatment, Storage and Disposal (cont'd)

NA

7. If wastes subject to nationwide variances, case-by-case extensions, or no migration petitions were disposed, does the facility have notices and records of disposal ? ___ Yes ___ No

8. If the facility has a case-by-case extension, is there data available to verify that the facility is making progress as described in progress reports ? ___ Yes ___ No

9. If the facility is disposing of a soft hammer waste, are notices or certifications maintained onsite ? ___ Yes ___ No

   If yes,

   A. Could any of these wastes be classified as California List wastes ? ___ Yes ___ No

   B. Did the facility seek to verify whether these wastes are subject to all restrictions ? ___ Yes ___ No

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LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form C - Manifesting Restricted Wastes

Note: This form should be completed only if the generator or handler ships restricted waste offsite for treatment or disposal. The following requirements may also apply to treatment facilities (including incinerators) which ship residues, still bottoms, or ash offsite for additional treatment or disposal.

---

1. If restricted wastes which exceed treatment standards, and are not subject to case-by-case extensions, "no migration" exemption, or nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:

NA

A. Manifest document number ? ___ Yes ___ No

B. EPA waste identification code ? ___ Yes ___ No

C. Treatment standards for each restricted waste ? ___ Yes ___ No

D. Waste analysis data (if available) ? ___ Yes ___ No

E. All applicable restrictions ? ___ Yes ___ No

Notice: Restricted wastes which exceed treatment standards may only be sent for treatment (including incineration). Such wastes are prohibited from land disposal, unless there is a variance or extension applicable to the waste.

2. Identify all offsite treatment facilities accepting wastes exceeding treatment standards:

3. If restricted wastes do not exceed treatment standards, are subject to case-by-case extension, have a "no migration" exemption, or a nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:

A. Manifest document number ? ___ Yes ___ No

No wastes have been shipped off site. Paint Waste (F003+ F005) are in container storage area waiting to be shipped off site

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Form C - Manifesting Restricted Wastes (cont'd)

NA

B. EPA waste identification code ? ___ Yes ___ No

C. Treatment standards for each restricted waste ? ___ Yes ___ No

D. Waste analysis data (if available) ? ___ Yes ___ No

E. All applicable restrictions ? ___ Yes ___ No

F. Date the wastes are subject to restrictions ? ___ Yes ___ No

G. The following certification ? ___ Yes ___ No

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of imprisonment.

Notice: The above certification statement must be signed by an authorized representative of the facility.

4. Identify all offsite treatment or disposal facilities accepting wastes below treatment standards:

_____

_____

_____

5. If waste is subject to a nationwide variance (e.g. solvent-water mixtures less than 1%), extension or petition has the facility provided notice to disposers that waste is exempt from land disposal restrictions ? ___ Yes ___ No

6. Does the generator or handler keep records of all notifications or certifications for waste sent to offsite facilities <u>after</u> August 16, 1988 ? ___ Yes ___ No

Inspector's Initials: JEP

Facility Name: FSR+L
EPA Id Number: 439

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form D - Testing and Management of F-solvents and Dioxins

Note: This form should be completed only if the facility generates or handles F-solvents or Dioxin wastes regardless of concentrations.

NA

1. Has the facility correctly determined the appropriate treatability group [268.41] for F-solvents generated or handled onsite (see Appendix A) ? ___ Yes ___ No

2. Has the facility determined whether F-solvent wastes exceed treatment standards based on the following:

   A. Knowledge of process ? ___ Yes ___ No

      i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

      _____

      _____

      _____

   B. Toxicity Characteristic Leaching Process (TCLP) ? ___ Yes ___ No

      i. If yes, provide the following information:

         a. Last test date: _____

         b. Frequency of testing: _____

         c. Indicate any problems with testing procedure below:

         _____

         _____

         _____

      ii. Attach test results to report.

      iii. Were wastes tested using TCLP when processes or wastestreams changed ? ___ Yes ___ No

      iv. Was testing done prior to dilution or solidification ? ___ Yes ___ No

   C. Other (specify): _____

3. Did F-solvent wastes exceed their applicable treatment standards upon generation [268.7(a)(2)] ? ___ Yes ___ No

Facility Name: FSRPL
EPA Id Number: #39

Form D - Testing and Management of F-solvents and Dioxins (cont'd)

N/A

4. Did the facility dilute the waste or treatment residuals as a substitute for adequate treatment [268.3] ? ___ Yes ___ No

5. Were treatment residuals generated from 264/265 RCRA-exempt units or processes ? ___ Yes ___ No

   If yes,

   A. List the type(s) of treatment and unit(s) below:

   _____

   _____

   _____

   Note: If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

6. Have F-solvents or dioxin wastes been stored for greater than 90 days ? ___ Yes ___ No

   If yes,

   A. Is facility operating under interim status or final permit ? ___ Yes ___ No

If the answer was yes for either 6 or 6A, complete Form B - Treatment, Storage and Disposal.

Inspector's Initials: T.E.M.

Facility Name: FSR+L
EPA Id Number: 439

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form E - Testing and Management of California List Wastes

Note: This form should be completed only if the facility generates or handles California List wastes at the concentrations listed in Form A - Restricted Waste Determination.

NA

1. Has the facility conducted any testing of restricted wastes to determine whether the concentrations qualify them as California Wastes ? ___ Yes ___ No

   If no,

   Has the facility retained records documenting that the waste is not restricted under the California List by knowledge of process ? ___ Yes ___ No

2. Has the Paint Filter Liquids Test (PFLT) been performed as described by SW-846 to determine whether California List wastes (except halogenated organic compounds) are in liquid form ? ___ Yes ___ No

3. If wastes have been determined to be in liquid form, were these wastes solidified using an absorbent ? ___ Yes ___ No

   A. If yes, note type of absorbent used: _____

   B. Indicate which wastes were solidified by aborbent below:

   Check each box that applies:

   ☐ Liquid hazardous wastes or liquids associated with solids or sludges containing free cyanides at concentration greater than 1000 mg/L.

   ☐ Liquid hazardous wastes or liquids associated with solids or sludges containing one or more of the following concentrations:

   ☐ Arsenic or compounds containing arsenic greater than 500 mg/L;

   ☐ Cadmium or compounds containing cadmium greater than 100 mg/L;

   ☐ Chromium or compounds containing chromium greater than 500 mg/L;

   ☐ Lead or compounds containing lead greater than 500 mg/L;

Facility Name: FSR+L
EPA Id Number: 439

Form E - Testing and Management of California List Wastes (cont'd)

NA

- ☐ Mercury or compounds containing mercury greater than 20 mg/L;
- ☐ Nickel or compounds containing nickel greater than 134 mg/L;
- ☐ Selenium or compounds containing selenium greater than 100 mg/L; or
- ☐ Thallium or compounds containing Thallium greater than 130 mg/L.

☐ Liquid hazardous wastes exhibiting a pH less than or equal to 2.0.

☐ Liquid hazardous wastes that also contain polychlorinated biphenols (PCBs) at concentrations between 50 to 500 mg/L.

☐ Liquid or nonliquid hazardous waste containing halogenated organic compounds at concentrations greater than or equal to 1000 mg/Kg.

4. Has the facility determined whether concentration levels of the analytes (not extracts or filtrates) equal or exceed prohibition levels or whether the pH of the wastes is less than or equal to 2.0 based on:

A. Knowledge of process ? ___ Yes ___ No

i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

_____

_____

_____

B. Testing ? ___ Yes ___ No

i. Did the facility determine if concentration levels in PFLT extracts exceed cyanide or metal treatment standards ? ___ Yes ___ No

ii. List the test methods used: _____

iii. List constituents and respective concentration levels for wastes found to exceed prohibition levels below:

_____

_____

_____

Facility Name: FSR+L
EPA Id Number: 439

Form E - Testing and Management of California List Wastes (cont'd)

5. Has the facility treated waste onsite or offsite: NA

   A. If onsite, complete Form B - Treatment, Storage, and Disposal.

   B. If offsite, complete Form C - Manifesting Restricted Wastes.

Inspector's Initials: T.E.M

Facility Name: FSR+L
EPA Id Number: 439

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form F - Testing and Management of "First Third" Wastes

Note: This form should be completed only if the facility generates or handles wastes restricted under the "First Third" list (August 17, 1988).

N/A

I. Hard Hammer Provisions

1. Has the facility correctly determined the appropriate treatability group for hard hammer wastes generated or handled onsite ? ___ Yes ___ No

2. Has the facility determined whether hard hammer wastes exceed treatment standards based on the following:

   A. Knowledge of process ? ___ Yes ___ No

      i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

      _____

      B. Toxicity Characteristic Leaching Process (TCLP) ? ___ Yes ___ No

      i. If yes, provide the following information:

         a. Last test date: _____

         b. Frequency of testing: _____

         c. Indicate any problems with testing procedure below:

         _____

      ii. Attach test results to report.

      iii. Were wastes tested using TCLP when processes or wastestreams changed ? ___ Yes ___ No

      iv. Was testing done prior to dilution or solidification ? ___ Yes ___ No

T.E.M.

Facility Name: FSR+L
EPA Id Number: 439

Form F - Testing and Management of "First Third" Wastes

NA

C. Other (specify): _____

3. Did the hard hammer wastes exceed their applicable treatment standards upon generation [268.7(a)(2)] ? ___ Yes ___ No

4. Is there any reason to believe that the facility may have diluted these wastes to change the applicable treatment standard (based on review if process operation, pipe routing, point of sampling, etc.) ? ___ Yes ___ No

5. Did the facility ascertain whether hard hammer wastes were appropriately assigned wastewater on non-wastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) ? ___ Yes ___ No

6. Does the facility handle K061 wastes ? ___ Yes ___ No

   If yes,

   A. Were nonwastewaters appropriately classified in either the high or low zinc subcategories (> 15% Zn) ? ___ Yes ___ No

7. Does the facility handle K101 or K102 wastes ? ___ Yes ___ No

   If yes,

   A. Were nonwastewaters appropriately classified in either the high or low arsenic subcategories ? ___ Yes ___ No

8. Have hard hammer wastes been stored for greater than 90 days ? ___ Yes ___ No

   If yes,

   A. is facility operating under interim status or final permit ? ___ Yes ___ No

If the answer was yes for either 8 or 8A, complete Form B - Treatment, Storage and Disposal.

Facility Name: FSR&L
EPA Id Number: 439

Form F - Testing and Management of "First Third" Wastes

II. Soft Hammer Provisions

N/A

1. Has the facility submitted demonstrations and certifications for each soft hammer waste destined for disposal in landfills or surface impoundments to the Regional Administrator prior to the shipment of the waste to the disposal facility ? ___ Yes ___ No

   If yes,

   i. Has the facility retained a copy of each demonstration onsite ? ___ Yes ___ No

   ii. Has the facility retained copies of all certifications sent to the disposal facility ? ___ Yes ___ No

2. Has the facility sent copies and kept copies of the following information with each shipment of soft hammer wastes:

   A. Manifest document number ? ___ Yes ___ No

   B. EPA waste identification code ? ___ Yes ___ No

   C. All applicable restrictions ? ___ Yes ___ No

   D. Waste analysis data (if available) ? ___ Yes ___ No

   E. Applicable certifications ? ___ Yes ___ No

3. Do facility records indicate that soft hammer wastes are destined for disposal in landfills or surface impoundments ? ___ Yes ___ No

   If yes,

   A. List the name of the waste(s) destined for disposal:

   _____

   _____

   _____

   B. Name the facility where the waste is destined:

   _____

   _____

Facility Name: FSR+L
EPA Id Number: 439

Form F - Testing and Management of "First Third" Wastes

NA

4. Have soft hammer wastes been stored for greater than 90 days ?

___ Yes ___ No

A. If yes, is facility operating under interim status or final permit ?

___ Yes ___ No

If the answer was yes for either 4 or 4A, complete Form B - Treatment, Storage and Disposal.

Inspector's Initials: JEM

Attachment 1

ENVIRONMENTAL CONTROL TECHNOLOGY CORPORATION (ENCOTEC)
3985 Research Park Drive * Ann Arbor, MI 48108
313 / 761-1389

ORGANICS DATA SUMMARY REPORT
GC/MS WASTE CHARACTERIZATION/PROFILE

Project Name: Rollins (TX)
Project Number: 82300
Method: 3580/8240/8270
Report Date: May 05, 1989

SAMPLE MANAGEMENT INFORMATION

Generator Sample Identification: Waste Cement Rubber

ENCOTEC Identification: 30482

HO- 15290

Generator Name: Firestone Synthetic Rubber

Date Received: 4/10/89

Date Analyzed

8240: 4/14/89

8270: 4/14/89

Sample Date: 4/06/89

PHYSICAL CHARACTERISTICS

Sample Form: Solid

Number of Phases: One

Physical Properties: Clear Jelly

Miscible In Dilution Solvent?

METHANOL: Partially

METHYLENE CHLORIDE: Yes

QUALITY CONTROL/QUALITY ASSURANCE

Volatile QC Set Number: 041489C

Semivolatile QC Set Number: 041489D

SURROGATE PERCENT RECOVERIES

		QC LIMITS
VOLATILE SURROGATES		
D4-1,2-Dichloroethane:	100	(70 - 121)
D8-Toluene:	108	(81 - 117)
Bromofluorobenzene:	112	(74 - 121)
SEMIVOLATILE SURROGATES		
2-Fluorophenol:	77	(25 - 121)
D6-Phenol:	72	(24 - 113)
2,4,6-Tribromophenol:	78	(19 - 122)
D5-Nitrobenzene:	76	(23 - 120)
2-Flurobiphenyl:	81	(30 - 115)
D14-Terphenyl:	70	(18 - 137)

Percent Recoveries: 0 out of 9 outside of QC limits*

*Note: All surrogates are evalated based on U.S. E.P.A. published limits for Medium-High level waste samples.

KEY TO DATA QUALIFIERS

U = Analyte not detected

B = Analyte present in method blank

J = Analyte concentration is estimated due to matrix interferences.

VOLATILE ORGANICS	CAS #	UNITS	CONC.	DETECTION LIMIT
Acetone	67-64-1	g/kg	U	2.0
Acetonitrile	75-05-8	g/kg	U	10.0
Acrolein	107-02-8	g/kg	U	2.0
Acrylonitrile	107-13-1	g/kg	U	2.0
Benzene	71-43-2	g/kg	U	1.0
2-Butanone	78-93-3	g/kg	U	2.0
Bromodichloromethane	75-27-4	g/kg	U	1.0
Bromoform	75-25-2	g/kg	U	1.0
Bromomethane	74-83-9	g/kg	U	2.0
Carbon Disulfide	75-15-0	g/kg	U	2.0
Carbon Tetrachloride	56-23-5	g/kg	U	1.0
Chlorobenzene	108-90-7	g/kg	U	1.0
2-Chloro-1,3-Butadiene (Chloroprene)	126-99-8	g/kg	U	2.0
Chloroethane	75-00-3	g/kg	U	2.0
2-Chloroethyl Vinyl Ether	110-75-8	g/kg	U	2.0
Chloroform	67-66-3	g/kg	U	1.0
Chloromethane	74-87-3	g/kg	U	2.0
3-Chloropropene (Allyl Chloride)	107-05-1	g/kg	U	2.0
Dibromochloromethane	124-48-1	g/kg	U	1.0
1,2-Dibromo-3-chloropropane	96-12-8	g/kg	U	2.0
1,2-Dibromoethane	106-93-4	g/kg	U	2.0
Dibromomethane	74-95-3	g/kg	U	2.0
trans-1,4-Dichloro-2-butene	110-57-6	g/kg	U	2.0
Dichlorodifluoromethane	75-71-8	g/kg	U	2.0
1,1-Dichloroethane	75-34-3	g/kg	U	1.0
1,2-Dichloroethane	107-06-2	g/kg	U	1.0
1,1-Dichloroethene	75-35-4	g/kg	U	1.0
trans-1,2-Dichloroethene	156-60-5	g/kg	U	1.0
1,2-Dichloropropane	78-87-5	g/kg	U	1.0
cis-1,3-Dichloropropene	10061-01-5	g/kg	U	1.0
trans-1,3-Dichloropropene	10061-02-6	g/kg	U	1.0
1,4-Dioxane	123-21-1	g/kg	U	10.0
Ethylbenzene	100-41-4	g/kg	U	1.0
Ethyl methacrylate	97-63-2	g/kg	U	10.0
2-Hexanone	591-78-6	g/kg	U	2.0
Iodomethane	74-88-4	g/kg	U	2.0
Isobutyl alcohol	78-83-1	g/kg	U	10.0
Methacrylonitrile	126-98-7	g/kg	U	2.0
Methylene chloride	75-09-2	g/kg	U	1.0
Methyl methacrylate	80-62-6	g/kg	U	2.0
4-Methyl-2-pentanone	108-10-1	g/kg	U	2.0
Propionitrile	107-12-0	g/kg	U	20.0
Pyridine	110-86-1	g/kg	U	10.0

VOLATILE ORGANICS	CAS #	UNITS	CONC.	DETECTION LIMIT
Styrene	100-42-5	g/kg	U	1.0
1,1,1,2-Tetrachloroethane	630-20-6	g/kg	U	2.0
1,1,2,2-Tetrachloroethane	79-34-5	g/kg	U	1.0
Tetrachloroethene	127-18-4	g/kg	U	1.0
Toluene	108-88-3	g/kg	U	1.0
1,1,1-Trichloroethane	71-55-6	g/kg	U	1.0
1,1,2-Trichloroethane	79-00-5	g/kg	U	1.0
Trichloroethene	79-01-6	g/kg	U	1.0
Trichlorofluoromethane	75-69-4	g/kg	U	2.0
1,2,3-Trichloropropane	96-18-4	g/kg	U	2.0
Vinyl Acetate	108-05-4	g/kg	U	2.0
Vinyl Chloride	75-01-4	g/kg	U	2.0
Total Xylenes	1330-20-7	g/kg	U	1.0

EXTRACTABLE ORGANICS SEMIVOLATILES	CAS #	UNITS	CONC.	DETECTION LIMIT
Acenaphthene	83-32-9	g/kg	U	2.0
Acenaphthylene	208-96-8	g/kg	U	2.0
Acetophenone	98-86-2	g/kg	U	4.0
2-Acetylaminofluorene	53-96-3	g/kg	U	4.0
4-Aminobiphenyl	92-67-1	g/kg	U	4.0
Aniline	62-53-3	g/kg	U	4.0
Anthracene	120-12-7	g/kg	U	2.0
Benzidine	92-87-5	g/kg	U	10.0
Benzo(a)anthracene	56-55-3	g/kg	U	2.0
Benzo(a)pyrene	50-32-8	g/kg	U	2.0
Benzo(b)fluoranthene	205-99-2	g/kg	U	2.0
Benzo(k)fluoranthene	207-08-9	g/kg	U	2.0
Benzo(ghi)perylene	191-24-2	g/kg	U	2.0
Benzoic Acid	65-85-0	g/kg	U	10.0
Benzyl alcohol	100-51-6	g/kg	U	2.0
Bis(2-chloroethoxy) methane	111-91-1	g/kg	U	2.0
Bis(2-chloroethyl) ether	111-44-4	g/kg	U	2.0
Bis(2-chloroisopropyl) ether	39638-32-9	g/kg	U	2.0
Bis(2-ethylhexyl) phthalate	117-81-7	g/kg	U	2.0
4-Bromophenyl phenyl ether	101-55-3	g/kg	U	2.0
Butyl benzyl phthalate	85-68-7	g/kg	U	2.0
4-Chloroaniline	106-47-8	g/kg	U	2.0
Chlorobenzilate	510-15-6	g/kg	U	4.0
4-Chloro-3-methylphenol	59-50-7	g/kg	U	2.0
2-Chloronaphthalene	91-58-7	g/kg	U	2.0
2-Chlorophenol	95-57-8	g/kg	U	2.0
4-Chlorophenyl Phenyl Ether	7005-72-3	g/kg	U	2.0
Chrysene	218-01-9	g/kg	U	2.0
Diallate	2303-16-4	g/kg	U	4.0
Dibenzo(a,h) anthracene	53-70-3	g/kg	U	2.0
Dibenzofuran	132-64-9	g/kg	U	2.0
Di-n-butyl Phthalate	84-74-2	g/kg	U	2.0
1,2-Dichlorobenzene	95-50-1	g/kg	U	2.0

EXTRACTABLE ORGANICS SEMIVOLATILE	CAS #	UNITS	CONC.	DETECTION LIMITS
1,3-Dichlorobenzene	541-73-1	g/kg	U	2.0
1,4-Dichlorobenzene	106-46-7	g/kg	U	2.0
3,3'-Dichlorobenzidine	91-94-1	g/kg	U	4.0
2,4-Dichlorophenol	120-83-2	g/kg	U	2.0
2,6-Dichlorophenol	87-65-0	g/kg	U	4.0
Diethyl Phthalate	84-66-2	g/kg	U	2.0
p-(Dimethylamino) azobenzene	60-11-7	g/kg	U	4.0
7,12-Dimethylbenz(a)anthracene	57-97-6	g/kg	U	4.0
3,3'-Dimethylbenzidine	119-93-7	g/kg	U	8.0
alpha, alpha-Dimethyl phenethylamine	122-09-8	g/kg	U	10.0
2,4-Dimethylphenol	105-67-9	g/kg	U	10.0
Dimethyl Phthalate	131-11-3	g/kg	U	2.0
1,3-Dinitrobenzene	99-65-0	g/kg	U	4.0
4,6-Dinitro-2-methylphenol	534-52-1	g/kg	U	10.0
2,4-Dinitrophenol	51-28-5	g/kg	U	10.0
2,4-Dinitrotoluene	121-14-2	g/kg	U	2.0
2,6-Dinitrotoluene	606-20-2	g/kg	U	2.0
Di-n-octyl Phthalate	117-84-0	g/kg	U	2.0
Diphenylamine*	122-39-4	g/kg	U	4.0
1,2-Diphenylhydrazine	122-66-7	g/kg	U	4.0
Ethyl methane sulfonate	62-50-0	g/kg	U	8.0
Fluoranthene	206-44-0	g/kg	U	2.0
Fluorene	86-73-7	g/kg	U	2.0
Hexachlorobenzene	118-74-1	g/kg	U	2.0
Hexachlorobutadiene	87-68-3	g/kg	U	2.0
Hexachlorocyclopentadiene	77-47-4	g/kg	U	2.0
Hexachloroethane	67-72-1	g/kg	U	2.0
Hexachlorophene	70-30-4	g/kg	U	10.0
Hexachloropropene	1888-71-7	g/kg	U	10.0
Indeno(1,2,3-cd)pyrene	193-39-5	g/kg	U	2.0
Isophorone	78-59-1	g/kg	U	2.0
Isosafrole	120-58-1	g/kg	U	4.0
Methapyrilene	91-80-5	g/kg	U	10.0
3-Methylchlanthrene	56-49-5	g/kg	U	10.0
Methyl methanesulfonate	66-27-3	g/kg	U	8.0
2-Methylnaphthalene	91-57-6	g/kg	U	2.0
2-Methylphenol	95-48-7	g/kg	U	2.0
3-Methylphenol	108-39-4	g/kg	U	4.0
4-Methylphenol	106-44-5	g/kg	U	2.0
Naphthalene	91-20-3	g/kg	U	2.0
1,4-Naphthoquinone	130-15-4	g/kg	U	4.0
1-Naphthylamine	134-32-7	g/kg	U	4.0
2-Naphthylamine	91-59-8	g/kg	U	4.0
2-Nitroaniline	88-74-4	g/kg	U	10.0
3-Nitroaniline	99-09-2	g/kg	U	10.0
4-Nitroaniline	100-01-6	g/kg	U	10.0
Nitrobenzene	98-95-3	g/kg	U	2.0
2-Nitrophenol	88-75-5	g/kg	U	2.0

EXTRACTABLE ORGANICS SEMIVOLATILE	CAS #	UNITS	CONC.	DETECTION LIMITS
4-Nitrophenol	100-02-7	g/kg	U	10.0
5-Nitro-o-toluidine	99-55-2	g/kg	U	10.0
4-Nitroquinoline-1-oxide	56-57-5	g/kg	U	10.0
Ni-Nitroso-di-n-butylamine	924-16-3	g/kg	U	4.0
N-Nitrosodiethylamine	55-18-5	g/kg	U	4.0
N-Nitrosodimethylamine	62-75-9	g/kg	U	4.0
N-Nitrosodiphenylamine*	86-30-6	g/kg	U	2.0
N-Nitroso-di-n-propylamine	621-64-7	g/kg	U	4.0
N-Nitrosomethylethylamine	10595-95-6	g/kg	U	4.0
N-Nitrosomorpholine	59-89-2	g/kg	U	4.0
N-Nitrosopiperdine	100-75-4	g/kg	U	4.0
N-Nitrosopyrolidine	930-55-2	g/kg	U	4.0
Pentachlorobenzene	608-93-9	g/kg	U	8.0
Pentachloroethane	76-01-7	g/kg	U	10.0
Pentachloronitrobenzene	82-68-8	g/kg	U	10.0
Pentachlorophenol	87-86-5	g/kg	U	10.0
Phenacetine	62-44-2	g/kg	U	4.0
Phenanthrene	85-01-8	g/kg	U	2.0
Phenol	108-95-2	g/kg	U	2.0
p-Phenylene diamine	106-50-3	g/kg	U	10.0
2-Picoline	109-06-8	g/kg	U	10.0
Pronamide	23950-58-5	g/kg	U	10.0
Pyrene	129-00-0	g/kg	U	2.0
Safrole	94-59-7	g/kg	U	4.0
1,2,4,5-Tetrachlorobenzene	95-94-3	g/kg	U	8.0
2,3,4,6-Tetrachlorophenol	58-90-2	g/kg	U	8.0
0-Toluidine	95-53-4	g/kg	U	4.0
1,2,4-Trichlorobenzene	120-82-1	g/kg	U	2.0
2,4,5-Trichlorophenol	95-95-4	g/kg	U	2.0
2,4,6-Trichlorophenol	88-06-2	g/kg	U	2.0
1,3,5-Trinotrobenzene	99-35-4	g/kg	U	4.0

*Note: Compounds cannot be separated.

EXTRACTABLE ORGANICS PESTICIDES / PCB'S	CAS #	UNITS	CONC.	DETECTION LIMIT
Aldrin	309-00-2	g/kg	U	4.0
Alpha-BHC	319-84-6	g/kg	U	4.0
Beta-BHC	319-85-7	g/kg	U	4.0
Delta-BHC	319-86-8	g/kg	U	4.0
Gamma-BHC (Lindane)	58-89-9	g/kg	U	4.0
Chlordane	57-74-9	g/kg	U	50.0
4,4'-DDD	72-54-8	g/kg	U	4.0
4,4'-DDE	72-55-9	g/kg	U	4.0
4,4'-DDT	50-29-3	g/kg	U	4.0
Dieldrin	60-57-1	g/kg	U	4.0
Alpha-Endosulfan	959-98-8	g/kg	U	4.0
Beta-Endosulfan	33213-65-9	g/kg	U	4.0
Endrin	72-20-8	g/kg	U	4.0

EXTRACTABLE ORGANICS PESTICIDES / PCB'S	CAS #	UNITS	CONC.	DETECTION LIMIT
Endrin Aldehyde	7421-93-4	g/kg	U	8.0
Heptachlor	76-44-8	g/kg	U	4.0
Heptachlor Epoxide	1024-57-3	g/kg	U	8.0
Methoxychlor	72-43-5	g/kg	U	10.0
Aroclor-1016	12674-11-2	g/kg	U	10.0
Aroclor-1221	11104-28-2	g/kg	U	10.0
Aroclor-1232	11141-16-5	g/kg	U	10.0
Aroclor-1242	53469-21-9	g/kg	U	10.0
Aroclor-1248	12572-29-6	g/kg	U	10.0
Aroclor-1254	11097-69-1	g/kg	U	50.0
Aroclor-1260	11096-82-5	g/kg	U	50.0
Toxaphene	80001-35-2	g/kg	U	50.0

ENVIRONMENTAL CONTROL TECHNOLOGY CORPORATION
3985 Research Park Drive * Ann Arbor, MI 48108
313 / 761-1389

ORGANIC COMPOSITION REPORT

Project Name: Rollins (TX)
Project Number: 82300
Method: 3580/8240/8270
Report Date: May 05, 1989

SAMPLE IDENTIFICATION

Encotec Identification: 30482

HO- 15290

Generator Name: Firestone Synthetic Rubber

ORGANICS DETECTED BY THIS METHOD

TARGET COMPOUNDS	CAS #	CONCENTRATION (g/Kg)

No Organic Compounds Above 1% Detected By This Method.

NON-TARGET COMPOUNDS	CAS #	ESTIMATED CONCENTRATION (g/Kg)

NOTE: This report should be accompanied by the Volatile and Semivolatile Organic Data Summary Report. Do not distribute this form without all reports being present.

STATE OF LOUISIANA
HAZARDOUS WASTE DIVISION
OFFICE OF SOLID AND HAZARDOUS WASTE
DEPARTMENT OF ENVIRONMENTAL QUALITY
P. O. BOX 44307 BATON ROUGE, LA 70804

FOR DEPARTMENT USE

Date Received: _____

Date Checked: _____

Checked by: _____

Hazardous Waste Notification Form

XX HAZARDOUS WASTE XX REUSE/RECYCLE

1. NAME OF INSTALLATION: FIRESTONE SYNTHETIC RUBBER & LATEX CO.

2. MAILING ADDRESS: (STREET OR P.O. BOX) P O BOX 1361
(CITY OR TOWN) LAKE CHARLES (STATE) LA (ZIP CODE) 70602

3. LOCATION: (STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER) HWY 108 SOUTH ROSE BLUFF (FIPS PARISH CODE)
(CITY OR TOWN) SULPHUR (STATE) LA (ZIP CODE) 70663

4. CONTACT: (NAME & TITLE (last, first & title)) MARIO JUVES ENVIRONMENTAL ENGR (PHONE (area code & no.)) 318 882 5375

5. OWNERSHIP: (NAME) BRIDGESTONE/FIRESTONE INC

6. OPERATOR: (NAME OF COMPANY (CONTRACTOR) - IF APPLICABLE) N/A

7. NOTIFICATION TYPE: (Mark applicable boxes. Give Installation's La. I.D. No. and EPA I.D. No. if known)

Notification is: ☐ the first for this installation XX a subsequent notification

8. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity	B. Used Oil Fuel Activities
XX a Generator	☐ 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)* N/A
☐ 2. Transporter	☐ a. Generator Marketing to Burner
☐ 3. Treater/Storer/Disposer	☐ b. Other Marketer
☐ 4. Underground Injection	☐ c. Burner
☐ 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*	☐ 7. Specification Used Oil Fuel Marketer *(for On site Burner)* Who First Claims the Oil Meets the Specification
☐ a. Generator Marketing to Burner	
☐ b. Other Marketer	
XX c. Burner	

9. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

☐ A. Utility Boiler XX B. Industrial Boiler ☐ C. Industrial Furnace

10. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es))*

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other *(specify)* N/A

11. DESCRIPTION OF HAZARDOUS WASTES

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES (Category I-A)

WASTE NUMBER	DISPOSED ON SITE	DISPOSED OFF SITE	REUSED RECYCLE	
D001	X		X	Slop Oil

WASTE NUMBER	DISPOSED ON-SITE	DISPOSED OFF-SITE	REUSED RECYCLE	

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES (Category I-B)

WASTE NUMBER	DISPOSED ON-SITE	DISPOSED OFF SITE	REUSED RECYCLE	

WASTE NUMBER	DISPOSED ON-SITE	DISPOSED OFF SITE	REUSED RECYCLE	

C. COMMERCIAL CHEMICAL PRODUCTS HAZARDOUS WASTES (Category I-C)

WASTE NUMBER	DISPOSED ON-SITE	DISPOSED OFF SITE	REUSED RECYCLE	

WASTE NUMBER	DISPOSED ON-SITE	DISPOSED OFF SITE	REUSED RECYCLE	

D. CHARACTERISTICS OF NON-[illegible]D HAZARDOUS WASTES (Category II)

1. Mark the boxes corresponding [illegible] characteristics of non-listed hazardous wastes your installation handles. Use criteria in Appendix A, Cate

☐ Ignitable (D001) ☐ Corrosive (D002) ☐ Reactive (D003) ☐ Toxic (D000-EP Toxic)

2. List EP Toxic Waste numbers [illegible] at Category II-B, Appendix A and make other appropriate entries in the spaces provided.

WASTE NUMBER	DISPOSED ON-SITE	DISPOSED OFF SITE	[illegible]	

WASTE NUMBER	DISPOSED ON-SITE	DISPOSED OFF SITE	REUSED RECYCLE	

10. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature [signature] Name and Official Title Environmental Engineer

Company Firestone Synthetic Rubber & Latex Co. Date Signed 12-13-89

HW-1 (R 7/92)

Western Atlas International
A Litton/Dresser Company

CORE LABORATORIES

Job Number	-	893166
Date Received	-	08/31/89
Time Received	-	10:00
Customer Name	-	FIRESTONE
Customer Address	-	P.O. DRAWER 1361
Customer Location	-	LAKE CHARLES, LA 70601
Customer Contact	-	MARIO JUVES
Sample Description	-	API SEPERATOR - OIL PHASE

HAZARDOUS WASTE CHARACTERIZATION

CHARACTERISTICS	RESULT	UNITS	METHOD	REGULATORY THRESHOLD
Toxicity / Method 1310				
Arsenic	<0.48	mg/l	6010	≥ 5.0 mg/l
Barium	0.19	mg/l	6010	≥ 100 mg/l
Cadmium	<0.05	mg/l	6010	≥ 1.0 mg/l
Chromium	<0.48	mg/l	6010	≥ 5.0 mg/l
Lead	<0.87	mg/l	6010	≥ 5.0 mg/l
Mercury	<0.019	mg/l	7470	≥ 0.2 mg/l
Selenium	<0.77	mg/l	6010	≥ 1.0 mg/l
Silver	<0.48	mg/l	6010	≥ 5.0 mg/l

REFERENCE: EPA Test Methods for Evaluating Solid Waste: Nov 1986 SW-846 Third Edition

NOTE: ALL RESULTS ARE DRAMATICALLY DIFFERENT DUE TO CALCULATION ERROR.

On Behalf of Core Laboratories,

Robert Morris /cm

Robert Morris
Laboratory Supervisor

3239 Arizona Street
Sulphur, La. 70663
(318) 583-4926

The analysis, opinions or interpretations contained in this report are based upon observations and material supplied by the client for whose exclusive and confidential use this report has been made. The interpretations or opinions expressed represent the best judgement of Core Laboratories. Core Laboratories assumes no responsibility and makes no warranty or representations express or implied as to the productivity, proper operations, or profitableness however of any oil, gas, coal or other mineral, property, well or sand in connection with which such report is used or relied upon for any reason whatsoever.

Attachment 4

LOUISIANA DEPARTMENT
OF ENVIRONMENTAL QUALITY

GENERATOR'S ANNUAL
HAZARDOUS WASTE REPORT

Information submitted in the following report is for calendar year 1988

SITE IDENTIFICATION

Reporting Facility EPA ID # LAD008073439

Reporting Facility Name Firestone Synthetic Rubber and Latex Co.

SITE LOCATION

Reporting Facility Location Highway 108, Rose Bluff

City or Town Lake Charles Parish Calcasieu State LA Zip 70602 Parish Code 019

SITE MAILING ADDRESS

Reporting Facility Mailing Address P.O. Box 1361

City or Town Lake Charles State LA Zip 70602

REPORT CONTACT

Name Mario - Juves
(first) (mi) (last)

Phone Number (318) 882 - 5375 Extension --

REPORT CERTIFICATION

I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name Mario - Juves
(first) (mi) (last)

Title Environmental Coordinator

Signature Mario Juves Signature Date 4/24/89

FORM A - Cover Sheet/Certification (R-2/89)

LOUISIANA DEPARTMENT
OF ENVIRONMENTAL QUALITY

GENERATOR SUMMARY
FOR DISPOSED WASTE

Information submitted in the following report is for calendar year 1988

Reporting Facility EPA ID # LAD008073439

Disposing Facility EPA ID # LAD000777201

Disposing Facility Name Chemical Waste Management, Inc.

Disposing Facility Location Route 2, John Brannon Road

City or Town Carlyss State LA Zip 70663

Summary Totals (By Waste Type)

EPA Hazardous Waste Number	Handling Method	Total Amount of Waste in Tons (Do NOT Change Reporting Increment)
D001	S01, D80	134 (waste rubber amount)
D008	S02, D80	21 (API Separator oil)