DRAFT

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION & ENERGY

OFFICE OF ENFORCEMENT POLICY

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: NATIONAL STARCH & CHEMICAL CO.

FACILITY FILE NUMBER: 18-06-06

EPA ID NUMBER: NJD001519230

STREET ADDRESS: 10 FINDERN AVE.

MUNICIPALITY: BRIDGEWATER

COUNTY : SOMERSET TELEPHONE # 908-685-5024

LOT : 1 BLOCK: 6101

FACILITY PERSONNEL; BOB STRAIN - MGR., HEALTH & SAFETY;
(name & title)
ROGER GARY - COMPLIANCE SUPERVISOR; JULIAN FRIEDMAN - DIRECTOR SITE MGMT.

MAILING ADDRESS: SAME

INSPECTION TYPE: GRANT: 01 FEE BASED: ✓ PAC CODE: PWT

INSPECTION DATE: 7-24-92

INSPECTOR'S NAME: ROBIN JONES

INSPECTOR'S AGENCY: NJDEPE BUREAU: NFO

OTHER STATE/EPA PERSONNEL:

INCIDENT/CASE NUMPER:

BILLING ADDRESS: SAME

REPORT PREPARED BY: JONES

REVIEWED BY: [illegible] DATE OF REVIEW: 7-29-92

dhwm 29 draft rev. 03/27/92

INSPECTION DATES: 7-24-92
TIME IN: 0855
TIME OUT: 1345

PHOTOS TAKEN: (____) YES (X) NO HOW MANY (____) PHOTO LOG ATTACHED

SAMPLES TAKEN: (____) YES (✓) NO HOW MANY (____) SAMPLE LOG ATTACHED

SITE BACKGROUND INFORMATION

EMPLOYEES: 1,000 DATE OPERATIONS BEGUN: 1974

SHIFTS/WEEK: 5 SIC CODE: 7391

ACRES: 97 # OF BUILDINGS/SQFT: 2

PRODUCTS PRODUCED: R & D REGARDING ADHESIVES, RESINS AND STARCHES

VOLUME PRODUCED (or $ value): UNMEASURABLE AT THIS CAPACITY

PREVIOUS OPERATIONS AT SITE: NONE

WATER SUPPLY: CITY

SANITARY DISPOSAL: SEWER SOMERSET/RARITAN VALLEY SEWAGE AUTHORITY

FLOOR DRAINS: CAFETERIA AREA TO SEWER AUTHORITY

IF NEEDED ATTACH AN ADDENDUM LISTING PERTINENT INFORMATION FOR EACH OF THE ITEMS LISTED BELOW:

MONITORING WELLS: NO

TANKS ON SITE (NON HAZARDOUS/WASTE): NO

AIR PERMITS: 13 Dust collector, spray booths (SEE ATTACHED REPORT)

NJPDES PERMITS: 1 ONCE-THRU COOLING WATER → close to elimination (DEALS WITH PERMA-BOND UNDER NATIONAL STARCH NAME)

OTHER PERMITS:

TWO YEAR ENFORCEMENT HISTORY

SUBJECT: N/A

EPA ID No.:

List the date of each violation.

List each citation, description, and the basis for issuing the violation.

List the type and date of any documents issued:

add additional pages as needed

INSPECTION & GENERAL FACILITY DESCRIPTION & OPERATIONS

NOTE: A SYNOPSIS OF THIS INSPECTION SHOULD BE INCLUDED IN THE NARRATIVE SECTION OF THIS REPORT. THIS SYNOPSIS SHOULD INCLUDE,BUT NOT BE LIMITED TO, A DESCRIPTION OF THE CONDITIONS FOUND AT THE FACILITY.

NOTE: INCLUDE A SITE MAP OR SKETCH. MARK ALL HAZARDOUS WASTE STORAGE AREAS AND TANKS ON THE MAP.

NOTE: TAKE PICTURES OF ALL POTENTIAL VIOLATIONS. SECURE ALL EVIDENCE WHICH MAY BE NEEDED FOR FUTURE LITIGATION; LEAVE RECEIPTS FOR ANY EVIDENCE REMOVED FROM THE FACILITY.

add additional as needed

GENERAL FACILITY DESCRIPTIONS

National Starch and Chemical Company, (NSCC) which was last inspected in 1981, has its corporate operations at this site. Also occupying this property, is a small adhesives Q&A lab known as Permabond International. This facility has a separate EPA ID #, several air permits and a NJDPES permit, but is not associated with NSCC.

NSCC is composed of administrative offices and also two wings dedicated to QA/QC research lab activities. The labs which generate all hazardous waste, albeit small quantities of oil, perform analytical work for three distinct divisions: resins, adhesives and starches. Synthesized intermediates are developed both for food and non food grade products, including starches for food thickeners, cornstarch-based packing "peanuts" and paper products. Adhesives are used in a variety of commercial packaging products and associated wrappers, brown packing tapes and the auto and construction industries.

In most cases, the client will request research and development for existing or new products. Small batches not exceeding 5-50 gallons are produced and sent to the customer for trial run or further experimentation.

One wing is dedicated primarily for resins and adhesives and includes two floors, while the second wing primarily involves starch research. About 70% of all lab work involves non-hazardous chemicals.

Hazardous waste is generated primarily in glass and plastic containers consisting of no more than 1 gallon capacity. In most cases, the waste is brought to the accumulation area daily. No waste is allowed to accumulate in the labs for more than one week.

Product testing includes in addition to the wide variety of usual laboratory experiments, water and solvent-based adhesive applications within permitted spray booths, a small scale paper coating mill, and weather simulation machinery.

The explosion-proof accumulation room, located within the Product Storage Stockroom, consisted of five metal shelving units, which at this time, held 50-100 containers. The collection of glass and plastic containers also included about 10 1 gallon jars of various solvents, which were slated to be transferred to a 55 gallon drum by the transporter, AETC. Wastes are consolidated and removed from the site on a monthly basis. Outside this area was another room which housed reagents and raw products. Both rooms were kept clean and orderly.

HAZARDOUS WASTE GENERATION

A wide variety of wastes are generated from research and development activities such as extractions, batches beyond their usefulness, mismatched batches, small spills and broken thermometers. Much of their waste stream results from chemicals exceeding self life.

Small amounts of waste oil is generated in the process of vehicle and machinery maintenance.

The maintenance shop and garage each house one parts cleaner unit.

Attached is a list of all areas where "air" permits are valid.

The records associated with hazardous waste management were found to be in proper order, and all areas involving hazardous waste storage, well managed. However, only two LDR Notifications could be found involving parts cleaner removal. This matter will as a manner normal process, be referred to the EPA. Otherwise, no violations were issued, and no further action is recommended.

NATIONAL STARCH AND CHEMICAL
10 FINDERN AVE. BRIDGEWATER, NJ
SOMERSET CO
7-24-92

Stack #		Equipment
~~4~~		SO_2 Scrubber (Bldg. 5)
3		Maintenance Spray Booth
2		Spray Booth (West) > ADHESIVES
1		Spray Booth (East)
~~5~~		Reactor, Condenser (Bldg. 5)
~~6~~		Pre Wet Tank (Bldg. 5)
~~7~~		Anaerobic Process Vent South
~~8~~	NATIONAL STARCH AND CHEMICAL	Spray Booth (1224) → ADHESIVES
~~9~~		——— (Gasoline Tg)
10 ✓		Boiler #2
11 ✓		Boiler #3 (2 stacks)
12 ✓		Boiler #1
~~13~~		Anaerobic Process Vent North
14		Wood Adhesive Lab (Wood Shop Cyclone)
~~15~~		——— None
16		Portable Dust Collector (Bldg. 3)
17		VCM Afterburner/Scrubber
18 ✓		Panel Saw
19 ✓		Boiler #4
20		Faustel Pilot Coater Room Exhaust
21 ✓		Faustel Pilot Coater/Dryer Exhaust

STACK NUMBERS CROSSED OFF ARE ASSOCIATED WITH "PERMABOND INT'L" A SEPERATE, NON-RELATED COMPANY!

HAZARDOUS WASTE INVENTORY

SATELLITE STORAGE AREA
(mark individual areas on site sketch)

LOCATION	WASTE CODE	DESCRIPTION	CONTAINER SIZE TYPE	QUANTITY
SYNTHETIC POLYMER RESEARCH LAB	UNKNOWN	DICHLOROETHANE	1 GALLON PLASTIC JAR	1
ACCUMULATION ROOM	VARIOUS	VARIOUS	VARIOUS <1 pt – 1 gal. PLASTIC & GLASS JARS	50 – 100

add additional pages as needed

<90 DAY CONTAINER STORAGE AREA # (REPEAT FOR EACH AREA)
(mark individual area on site sketch)

LOCATION	WASTE CODE	DESCRIPTION	CONTAINER	SIZE TYPE	QUANTITY
		None			

add additional pages as needed

<90 DAY TANK STORAGE
(mark individual tanks on site sketch)

TANK #	WASTE CODE	DESCRIPTION	CAPACITY	QUANTITY
		None		

add additional pages as needed

MANIFESTS REVIEWED

Manifests reviewed from 7/89 through 7/92

Number of generator manifests in compliance: 64

Number of generator manifests not in compliance: 0

According to the manifests, does the generator export any waste? (yes/no) NO

List manifest document numbers of those manifests not in compliance and note each deficiency.

Attach copies of manifests which have deficiencies

Manifest Document Number	Deficiency (citation)

add additional pages as needed

WASTE MANIFESTS FROM 01/01/90 TO 07/29/92
FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ NJD001519230	ADVANCED ENV TECHNOLOGY CORP EDEN LANE FLANDERS , NJ NJD980536593					
		NJA0655211	05/17/90	D003	CHARACTERISTIC OF REACTIVITY	9 P
				D003	CHARACTERISTIC OF REACTIVITY	18 P
				D003	CHARACTERISTIC OF REACTIVITY	11 P
				D003	CHARACTERISTIC OF REACTIVITY	9 P
		NJA0756926	11/01/90	D003	CHARACTERISTIC OF REACTIVITY	10 P
				D003	CHARACTERISTIC OF REACTIVITY	10 P
				D003	CHARACTERISTIC OF REACTIVITY	10 P
				D003	CHARACTERISTIC OF REACTIVITY	10 P
		NJA0825661	04/12/90	F002	SPT HAL SOLV&STLBTM OF DEGREAS	180 P
				F003	NON HAL SOLV & STLBTM	460 P
				F005	NONHL SOLV & STLBTM	360 P
				U055	CUMENE	12 P
				U213	TETRAHYDROFURAN (I)	11 P
				D001	CHARACTERISTIC OF IGNITABILITY	640 P
				X726	OIL/MT/ WRK,TURBN,DESEL,QUENCH	40 P
				X850	PACKED LABORATORY CHEMICALS	313 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	1480 P
		NJA0825707	01/09/90	F003	NON HAL SOLV & STLBTM	3255 P
				F005	NONHL SOLV & STLBTM	120 P
				U188	PHENOL	60 P
				D001	CHARACTERISTIC OF IGNITABILITY	60 P
				D002	CHARACTERISTIC OF CORROSIVITY	130 P
				X850	PACKED LABORATORY CHEMICALS	60 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	1200 P
		NJA0825938	02/13/90	F002	SPT HAL SOLV&STLBTM OF DEGREAS	115 P
				F003	NON HAL SOLV & STLBTM	1320 P
				F005	NONHL SOLV & STLBTM	415 P
				D001	CHARACTERISTIC OF IGNITABILITY	130 P
				D002	CHARACTERISTIC OF CORROSIVITY	245 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	400 P
		NJA0826227	04/10/90	F002	SPT HAL SOLV&STLBTM OF DEGREAS	120 P
				F003	NON HAL SOLV & STLBTM	670 P
				F005	NONHL SOLV & STLBTM	60 P
				U008	ACRYLIC ACID(I)	10 P
				U012	ANILINE(I)	120 P
				U118	ETHYLEMETHACRYLATE	10 P
				U162	METHYL METHACRYLATE	13 P
				U211	TETRACHLOROMETHANE	71 P
				D001	CHARACTERISTIC OF IGNITABILITY	661 P

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

WASTE MANIFESTS FROM 01/01/90 TO 07/29/92
FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
NATIONAL STARCH & CHEMICAL	ADVANCED ENV TECHNOLOGY CORP					
10 FINDERNE AVE	EDEN LANE					
BRIDGEWATER , NJ	FLANDERS , NJ					
NJD001519230	NJD980536593	NJA0826365	03/13/90	F005	NONHL SOLV & STLBTM	60 P
				F003	NON HAL SOLV & STLBTM	800 P
				F003	NON HAL SOLV & STLBTM	420 P
				D001	CHARACTERISTIC OF IGNITABILITY	60 P
				F005	NONHL SOLV & STLBTM	60 P
				X850	PACKED LABORATORY CHEMICALS	235 P
		NJA0827929	04/10/90	F003	NON HAL SOLV & STLBTM	1920 P
				F005	NONHL SOLV & STLBTM	240 P
				U007	ACRYLAMIDE	60 P
				U008	ACRYLIC ACID(I)	32 P
				U213	TETRAHYDROFURAN (I)	54 P
				X850	PACKED LABORATORY CHEMICALS	240 P
		NJA0828234	03/15/90	F003	NON HAL SOLV & STLBTM	1830 P
				F005	NONHL SOLV & STLBTM	200 P
				U041	EPICHLOROHYDRIN	40 P
				U226	1,1,1-TRICHLOROETHANE	40 P
				D001	CHARACTERISTIC OF IGNITABILITY	644 P
				X850	PACKED LABORATORY CHEMICALS	140 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	200 P
		NJA0836968	05/08/90	F002	SPT HAL SOLV&STLBTM OF DEGREAS	60 P
				F003	NON HAL SOLV & STLBTM	950 P
				F005	NONHL SOLV & STLBTM	95 P
				D001	CHARACTERISTIC OF IGNITABILITY	139 P
				D002	CHARACTERISTIC OF CORROSIVITY	563 P
				D003	CHARACTERISTIC OF REACTIVITY	167 P
				U008	ACRYLIC ACID(I)	9 P
				P069	2-METHYL LACTONITRILE	115 P
				X850	PACKED LABORATORY CHEMICALS	360 P
		NJA0836972	05/08/90	F002	SPT HAL SOLV&STLBTM OF DEGREAS	155 P
				F003	NON HAL SOLV & STLBTM	230 P
				F005	NONHL SOLV & STLBTM	155 P
				U008	ACRYLIC ACID(I)	28 P
				D001	CHARACTERISTIC OF IGNITABILITY	360 P
				D002	CHARACTERISTIC OF CORROSIVITY	175 P
				D001	CHARACTERISTIC OF IGNITABILITY	32 P
				D007	CHROMIUM	60 P
				X850	PACKED LABORATORY CHEMICALS	180 P
		NJA0838761	07/10/90	F003	NON HAL SOLV & STLBTM	1260 P
				F005	NONHL SOLV & STLBTM	60 P
				U007	ACRYLAMIDE	14 P

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NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ NJD001519230	ADVANCED ENV TECHNOLOGY CORP EDEN LANE FLANDERS , NJ NJD980536593	NJA0838761	07/10/90	D001	CHARACTERISTIC OF IGNITABILITY	272 P
				D002	CHARACTERISTIC OF CORROSIVITY	308 P
				D003	CHARACTERISTIC OF REACTIVITY	50 P
				D006	CADMIUM	60 P
				D007	CHROMIUM	60 P
		NJA0838773	07/10/90	F003	NON HAL SOLV & STLBTM	640 P
				U102	DIMETHYLPHTHALATE	60 P
				U188	PHENOL	345 P
				D001	CHARACTERISTIC OF IGNITABILITY	21 P
				D002	CHARACTERISTIC OF CORROSIVITY	90 P
				D003	CHARACTERISTIC OF REACTIVITY	8 P
				D005	BARIUM	10 P
				D007	CHROMIUM	80 P
				X726	OIL/MT/ WRK,TURBN,DESEL,QUENCH	2000 P
		NJA0838879	08/14/90	F002	SPT HAL SOLV&STLBTM OF DEGREAS	115 P
				F002	SPT HAL SOLV&STLBTM OF DEGREAS	180 P
				F005	NONHL SOLV & STLBTM	1010 P
				P022	CARBON DISULFIDE	60 P
				P105	SODIUM AZIDE	10 P
				U225	1,2-DICHLOROETHANE,TRANS	435 P
				U008	ACRYLIC ACID(I)	9 P
				D001	CHARACTERISTIC OF IGNITABILITY	320 P
				D002	CHARACTERISTIC OF CORROSIVITY	118 P
		NJA0839207	06/12/90	F001	SPT HAL SOLV&SLUDG DEGREAS OPE	60 P
				F003	NON HAL SOLV & STLBTM	935 P
				F005	NONHL SOLV & STLBTM	900 P
				P005	ALLYL ALCOHOL	60 P
				U006	ACETYL CHLORIDE(C,T)	9 P
				U007	ACRYLAMIDE	60 P
				U008	ACRYLIC ACID(I)	217 P
				D001	CHARACTERISTIC OF IGNITABILITY	996 P
				X850	PACKED LABORATORY CHEMICALS	191 P
		NJA0944647	01/08/91	F002	SPT HAL SOLV&STLBTM OF DEGREAS	10 P
				F003	NON HAL SOLV & STLBTM	600 P
				F005	NONHL SOLV & STLBTM	120 P
				D001	CHARACTERISTIC OF IGNITABILITY	10 P
				D002	CHARACTERISTIC OF CORROSIVITY	120 P
				X726	OIL/MT/ WRK,TURBN,DESEL,QUENCH	800 P
				X850	PACKED LABORATORY CHEMICALS	115 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	160 P
				X910	CHEMICAL PROCESS-SOLID,NOS	40 P

WASTE MANIFESTS FROM 01/01/90 TO 07/29/92
FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ	ADVANCED ENV TECHNOLOGY CORP EDEN LANE FLANDERS , NJ					
NJD001519230	NJD980536593	NJA0945701	12/12/91	D001	CHARACTERISTIC OF IGNITABILITY	20 P
				D001	CHARACTERISTIC OF IGNITABILITY	10 P
				D003	CHARACTERISTIC OF REACTIVITY	10 P
				D003	CHARACTERISTIC OF REACTIVITY	10 P
		NJA0945731	05/13/92	D001	CHARACTERISTIC OF IGNITABILITY	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	10 P
		NJA0980764	08/28/91	F003	NON HAL SOLV & STLBTM	2430 P
				D001	CHARACTERISTIC OF IGNITABILITY	230 P
				D002	CHARACTERISTIC OF CORROSIVITY	310 P
				D003	CHARACTERISTIC OF REACTIVITY	10 P
				X726	OIL/MT/ WRK,TURBN,DESEL,QUENCH	1600 P
				X850	PACKED LABORATORY CHEMICALS	130 P
		NJA0980870	11/12/90	F003	NON HAL SOLV & STLBTM	1470 P
				F005	NONHL SOLV & STLBTM	370 P
				U122	FORMALDEHYDE	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	456 P
				D002	CHARACTERISTIC OF CORROSIVITY	947 P
				D005	BARIUM	60 P
				X850	PACKED LABORATORY CHEMICALS	69 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	400 P
				X940	POISON/PESTICIDE,NOS	40 P
		NJA0980949	12/11/90	F003	NON HAL SOLV & STLBTM	550 P
				F005	NONHL SOLV & STLBTM	535 P
				U008	ACRYLIC ACID(I)	69 P
				D002	CHARACTERISTIC OF CORROSIVITY	115 P
				X850	PACKED LABORATORY CHEMICALS	60 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	40 P
				X910	CHEMICAL PROCESS-SOLID,NOS	400 P
		NJA1010627	09/11/90	F002	SPT HAL SOLV&STLBTM OF DEGREAS	60 P
				F003	NON HAL SOLV & STLBTM	1945 P
				U108	1,4-DIOXANE	40 P
				U118	ETHYLEMETHACRYLATE	10 P
				U162	METHYL METHACRYLATE	10 P
				U169	NITROBENZENE(I,T)	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	370 P
				D002	CHARACTERISTIC OF CORROSIVITY	180 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	5400 P

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NATIONAL STARCH & CHEMICAL	ADVANCED ENV TECHNOLOGY CORP					
10 FINDERNE AVE	EDEN LANE					
BRIDGEWATER , NJ	FLANDERS , NJ					
NJD001519230	NJD980536593	NJA1010685	10/09/90	F002	SPT HAL SOLV&STLBTM OF DEGREAS	50 P
				F003	NON HAL SOLV & STLBTM	1550 P
				F004	CRESOLS NITROBENZ SOLV &STLBTM	60 P
				U098	1,1-DIMETHYLHYDRAZINE	10 P
				U113	ETHYL ACRYLATE (I)	30 P
				U117	ETHYL ETHER (I,T)	207 P
				D001	CHARACTERISTIC OF IGNITABILITY	1726 P
				X850	PACKED LABORATORY CHEMICALS	300 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	80 P
		NJA1040105	03/12/91	F002	SPT HAL SOLV&STLBTM OF DEGREAS	60 P
				F003	NON HAL SOLV & STLBTM	1430 P
				F005	NONHL SOLV & STLBTM	120 P
				U028	BIS(2-ETHYLHEXYL)PHTHALATE	60 P
				D001	CHARACTERISTIC OF IGNITABILITY	610 P
				D002	CHARACTERISTIC OF CORROSIVITY	200 P
				X850	PACKED LABORATORY CHEMICALS	70 P
				X910	CHEMICAL PROCESS-SOLID,NOS	400 P
		NJA1041104	09/19/91	D001	CHARACTERISTIC OF IGNITABILITY	30 P
				D003	CHARACTERISTIC OF REACTIVITY	40 P
				U096	ALFA,ALFA-DIMETYLBENZYHYROPERO	10 P
				U160	METHYL ETHYL KETONE PEROXIDE	10 P
		NJA1043681	02/12/91	F003	NON HAL SOLV & STLBTM	1020 P
				F005	NONHL SOLV & STLBTM	155 P
				D002	CHARACTERISTIC OF CORROSIVITY	10 P
				X726	OIL/MT/ WRK,TURBN,DESEL,QUENCH	840 P
				X850	PACKED LABORATORY CHEMICALS	60 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	400 P
		NJA1155428	04/09/91	F003	NON HAL SOLV & STLBTM	1720 P
				U007	ACRYLAMIDE	60 P
				U202	SACCHARIN	10 P
				U223	TOLUENE DIISOCYANATE	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	40 P
				D002	CHARACTERISTIC OF CORROSIVITY	240 P
				D003	CHARACTERISTIC OF REACTIVITY	50 P
				X850	PACKED LABORATORY CHEMICALS	370 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	120 P
		NJA1155613	05/07/91	F002	SPT HAL SOLV&STLBTM OF DEGREAS	60 P
				F003	NON HAL SOLV & STLBTM	1460 P
				F005	NONHL SOLV & STLBTM	420 P
				D001	CHARACTERISTIC OF IGNITABILITY	130 P

WASTE MANIFESTS FROM 01/01/90 TO 07/29/92
FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ NJD001519230	ADVANCED ENV TECHNOLOGY CORP EDEN LANE FLANDERS , NJ NJD980536593	NJA1155613	05/07/91	D002	CHARACTERISTIC OF CORROSIVITY	200 P
				D006	CADMIUM	10 P
				D008	LEAD	10 P
				X850	PACKED LABORATORY CHEMICALS	70 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	840 P
		NJA1155713	07/09/91	F002	SPT HAL SOLV&STLBTM OF DEGREAS	60 P
				F003	NON HAL SOLV & STLBTM	300 P
				F005	NONHL SOLV & STLBTM	980 P
				U007	ACRYLAMIDE	180 P
				U069	DI-N-BUTYL PHTHALATE	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	485 P
				D002	CHARACTERISTIC OF CORROSIVITY	280 P
				D003	CHARACTERISTIC OF REACTIVITY	420 P
				X850	PACKED LABORATORY CHEMICALS	70 P
		NJA1155724	05/09/91	D009	MERCURY	780 P
		NJA1164060	06/11/91	F003	NON HAL SOLV & STLBTM	1010 P
				F005	NONHL SOLV & STLBTM	690 P
				U078	1,1-DICHLOROETHYLENE	60 P
				U080	DICHLOROMETHANE	60 P
				U113	ETHYL ACRYLATE (I)	60 P
				U162	METHYL METHACRYLATE	240 P
				D001	CHARACTERISTIC OF IGNITABILITY	595 P
				X726	OIL/MT/ WRK,TURBN,DESEL,QUENCH	800 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	40 P
		NJA1176253	10/08/91	F003	NON HAL SOLV & STLBTM	1560 P
				U008	ACRYLIC ACID(I)	10 P
				U092	DIMETHYLAMINE(I)	60 P
				U113	ETHYL ACRYLATE (I)	10 P
				U129	HEXACHLOROCYCLOHEXANE	10 P
				U147	MALEIC ANHYDRIDE	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	602 P
				D002	CHARACTERISTIC OF CORROSIVITY	170 P
				X850	PACKED LABORATORY CHEMICALS	545 P
		NJA1176313	11/12/91	F003	NON HAL SOLV & STLBTM	1050 P
				U009	ACRYLONITRILE	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	220 P
				D002	CHARACTERISTIC OF CORROSIVITY	280 P
				D007	CHROMIUM	10 P
				X850	PACKED LABORATORY CHEMICALS	80 P
				X910	CHEMICAL PROCESS-SOLID,NOS	75 P

WASTE MANIFESTS FROM 01/01/90 TO 07/29/92
FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ	ADVANCED ENV TECHNOLOGY CORP EDEN LANE FLANDERS , NJ					
NJD001519230	NJD980536593	NJA1314608	12/10/91	F003	NON HAL SOLV & STLBTM	420 P
				F005	NONHL SOLV & STLBTM	310 P
				U077	1,2-DICHLOROETHANE	60 P
				D001	CHARACTERISTIC OF IGNITABILITY	80 P
				D002	CHARACTERISTIC OF CORROSIVITY	30 P
				D003	CHARACTERISTIC OF REACTIVITY	10 P
				X850	PACKED LABORATORY CHEMICALS	70 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	800 P
		NJA1314619	01/14/92	F003	NON HAL SOLV & STLBTM	910 P
				F005	NONHL SOLV & STLBTM	60 P
				F003	NON HAL SOLV & STLBTM	10 P
				U008	ACRYLIC ACID(I)	20 P
				U202	SACCHARIN	10 P
				U188	PHENOL	60 P
				D001	CHARACTERISTIC OF IGNITABILITY	130 P
				X726	OIL/MT/ WRK,TURBN,DESEL,QUENCH	400 P
				X850	PACKED LABORATORY CHEMICALS	60 P
		NJA1314812	01/24/92	D003	CHARACTERISTIC OF REACTIVITY	10 P
				D003	CHARACTERISTIC OF REACTIVITY	10 P
				P030	CYANIDES	20 P
				D003	CHARACTERISTIC OF REACTIVITY	60 P
				U223	TOLUENE DIISOCYANATE	60 P
				D003	CHARACTERISTIC OF REACTIVITY	60 P
		NJA1316149	02/11/92	F003	NON HAL SOLV & STLBTM	890 P
				F005	NONHL SOLV & STLBTM	70 P
				U117	ETHYL ETHER (I,T)	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	230 P
				D002	CHARACTERISTIC OF CORROSIVITY	150 P
				X850	PACKED LABORATORY CHEMICALS	240 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	440 P
		NJA1316165	03/10/92	F002	SPT HAL SOLV&STLBTM OF DEGREAS	40 P
				F003	NON HAL SOLV & STLBTM	1110 P
				F005	NONHL SOLV & STLBTM	160 P
				D001	CHARACTERISTIC OF IGNITABILITY	10 P
				D002	CHARACTERISTIC OF CORROSIVITY	30 P
				X850	PACKED LABORATORY CHEMICALS	60 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	40 P
		NJA1316187	04/21/92	F003	NON HAL SOLV & STLBTM	1920 P
				F003	NON HAL SOLV & STLBTM	120 P

WASTE MANIFESTS FROM 01/01/90 TO 07/29/92
FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ NJD001519230	ADVANCED ENV TECHNOLOGY CORP EDEN LANE FLANDERS , NJ NJD980536593					
		NJA1316187	04/21/92	D001	CHARACTERISTIC OF IGNITABILITY	180 P
				D002	CHARACTERISTIC OF CORROSIVITY	240 P
				X850	PACKED LABORATORY CHEMICALS	60 P
		NJA1396476	05/12/92	F003	NON HAL SOLV & STLBTM	1165 P
				F005	NONHL SOLV & STLBTM	40 P
				U113	ETHYL ACRYLATE (I)	10 P
				U122	FORMALDEHYDE	60 P
				U162	METHYL METHACRYLATE	10 P
				D001	CHARACTERISTIC OF IGNITABILITY	245 P
				D002	CHARACTERISTIC OF CORROSIVITY	120 P
				X725	OIL SPILL CLEANUP MATERIAL	1605 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	400 P
		NJA1484528	06/10/92	F003	NON HAL SOLV & STLBTM	1480 P
				F002	SPT HAL SOLV&STLBTM OF DEGREAS	60 P
				F005	NONHL SOLV & STLBTM	120 P
				D001	CHARACTERISTIC OF IGNITABILITY	920 P
				P028	ALPHA-CHLOROTOLUENE	60 P
				U008	ACRYLIC ACID(I)	20 P
				C283	FORMALDEHYDE	400 P
				X850	PACKED LABORATORY CHEMICALS	120 P
				X900	CHEMICAL PROCESS-LIQUID,NOS	400 P
		NJA1484594	07/15/92	F002	SPT HAL SOLV&STLBTM OF DEGREAS	10 P
				F003	NON HAL SOLV & STLBTM	1000 P
				F005	NONHL SOLV & STLBTM	300 P
				P003	ACROLEIN	10 P
				U001	ACETALDEHYDE	10 P
				U055	CUMENE	10 P
				U069	DI-N-BUTYL PHTHALATE	410 P
				D001	CHARACTERISTIC OF IGNITABILITY	445 P
				X850	PACKED LABORATORY CHEMICALS	80 P
	S & W WASTE INC 105 JACOBUS AVE SO KEARNY , NJ NJD991291105					
		NJA0788301	02/01/90	D001	CHARACTERISTIC OF IGNITABILITY	605 G
				C377	PHENOL	11050 G
				X900	CHEMICAL PROCESS-LIQUID,NOS	356 G
				X910	CHEMICAL PROCESS-SOLID,NOS	1000 G

WASTE MANIFESTS FROM 01/01/90 TO 07/29/92
FROM GENERATOR NJD001519230 TO SPECIFIED TSDF'S

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
NATIONAL STARCH & CHEMICAL 10 FINDERNE AVE BRIDGEWATER , NJ NJD001519230	SAFETY-KLEEN CORP. 2-118-04 509-515 EAST MAIN ST BOUND BROOK , NJ NJD000768077	NJA0802249	05/22/90	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA0818562	03/23/90	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA0917251	07/16/90	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA0920309	11/05/90	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA0982069	01/07/91	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA0993402	02/27/91	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1102213	09/18/90	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1139105	04/23/91	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1205073	07/02/91	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1206653	08/23/91	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1339023	03/17/92	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1341253	12/12/91	D002	CHARACTERISTIC OF CORROSIVITY	131 P
		NJA1341669	10/17/91	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1362430	01/24/92	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1420862	07/10/92	D001	CHARACTERISTIC OF IGNITABILITY	131 P
		NJA1447298	05/14/92	D001	CHARACTERISTIC OF IGNITABILITY	131 P

GENERATOR INDEX

CHECK THE SECTIONS AND ACTIVITIES OF THIS REPORT WHICH ARE APPLICABLE TO THE FACILITY AND COMPLETE THOSE SECTIONS FOR THIS INSPECTION.

#	SECTION	PAGE	
1.	WASTE DETERMINATION	10.	X
2.	GENERATOR STATUS	12.	X
3.	SATELLITE ACCUMULATION AREAS	13.	X
4.	<90 DAY CONTAINER STORAGE AREAS	15.	X
5.	WASTE OIL USAGE	16.	X
6.	WASTE OIL TANKS	19.	
7.	ABOVE GROUND TANKS (<90 DAY)	21.	
8.	WASTE MANAGEMENT PRACTICES	23.	X
9.	GENERATOR MANIFESTS	24.	X
10.	EXPORTING HAZARDOUS WASTE	27.	
11.	CONTINGENCY PLAN & EMERGENCY PROCEDURES	28.	X
12.	PERSONNEL TRAINING	32.	X
13.	PREPAREDNESS & PREVENTION	35.	X
14.	"WASTE WATER TREATMENT UNIT" QUALIFICATION	37.	
15.	SUMMARY OF VIOLATIONS	39.	

SECTION 1.

WASTE DETERMINATION:

HAS THE FACILITY PROPERLY CLASSIFIED ALL OF ITS WASTES AND IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

The Generator does NOT produce any materials which meet the definition of a "solid waste". These would include any solid, liquid, semi-solid or contained gaseous material which has served or can no longer serve its original intended use. These materials include spent materials, sludges (i.e. waste water treatment sludge or material from air pollution control equipment),by-products, discarded commercial chemical products, scrap metals and residues. _____

If the generator does produce any of these materials, the facility does NOT:

1. Discard or intend to discard the material. _____
2. Accumulate, store or physically, chemically or biologically treat the material prior to, or in lieu of, discarding the material. _____
3. Burn the material for energy recovery. _____
4. Recycle the material. _____

1.6(d) The generator does NOT process any material under toll agreement pursuant to N.J.A.C. 7:26-1.4 (such material is classified as a "solid waste"). _____

8.5 The generator failed to determine:

8.5(a) if its "solid waste" is hazardous. _____

8.5(b) If the waste is a listed (or a mixture):

8. 5(b)1 The generator failed to determine the hazardous characteristics based upon testing of the waste in accordance with N.J.A.C. 7:26-8.9 - 8.12. _____

8.5(b)2 The generator failed to determine the hazardous characteristics based upon knowledge of the waste in accordance with N.J.A.C. 7:26-8.9 - 8.12. _____

8.5(c) If the waste is not listed or hazardous based on characteristics, and the Department requested the generator to submit a plan to analyze for the presence of hazardous waste constituents N.J.A.C. 7:26-8.16:

The generator failed to submit the plan in a timely manner, _____

The generator failed to conduct the approved plan and submit the results. _____

BASED ON CONSTITUENTS, IS THE WASTE HAZARDOUS? _____

8.5(d) The generator failed to keep the test results, waste analysis, or other determinations made in accordance with this section for three years (in operating log) from the date that the waste was last sent to an on-site or off-site TSDF? _____

SECTION 2.

GENERATOR STATUS

Does the generator generate/store >100 kg of hazardous waste (1kg acutely) or greater than 1001 gal of listed waste oil in any calender month? (except x725 - 100 kg rule applies)

_____

If no, does the generator wish to delist? _____

If the generator wishes to delist, do a delisting inspection.

If the generator does not wish to delist, complete this generator inspection.

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

7.4(a)1 The Generator <u>failed to</u> have an EPA ID number. _____

SECTION 3.

SATELLITE ACCUMULATION AREAS

NOTE: Satellite rules apply for "active drums" that are being currently used to accumulate hazardous waste. Satellite rules can be utilized until the original drum is moved within three days. A second drum can be utilized until the original drum is moved within three days. Capacity for the total storage capacity for any satellite accumulation area shall not exceed 110 gallons for each waste stream.

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

9.3(d)1 The quantity of waste in each accumulation area exceeds 55 gallons (less than 1 quart if acutely hazardous). _____

9.3(d)2 In addition to container requirements, the containers do not:

(a) meet the standards of 7.2 (Container Requirements). _____

nor are they:

(b) managed in accordance with 9.4(d)2, 9.4(d)3, & 9.4(d)4i (proper container storage). _____

9.3(d)3 The accumulation area is not at or near a point of generation where wastes initially accumulate in a process. _____

AND,

The area is not under the control of the operator of the process. _____

9.3(d)4 The containers are not marked "Hazardous waste". _____

9.3(d)5 The containers Are not marked with the date the container(s) reached the volume specified (55 gal. or I qt.). _____

AND,

9.3(d)6 after reaching the volume indicated in 9.3(d)1 above, the containers were not moved within three days to one of the following:

i. A less than 90 day accumulation storage area. _____

ii. An on-site authorized facility. _____

iii. An off-site authorized commercial facility. _____

SECTION 4.

GENERATOR STORAGE AREAS

Short term accumulation standards for generators who accumulate waste in containers for less than 90 days:

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

7.2(a)	The owner/operator failed to conspicuously label appropriate manifest number on hazardous waste containers that are intended for shipment.	_____
7.2(b)	The owner/operator failed to insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations. (49CFR 171,179)	_____
9.3(a)1	The generator is storing hazardous waste over 90 days in an "unauthorized facility".	_____
9.3(a)2	The waste is not placed in containers which meet the standards of NJAC 7:26-7.2 and are not managed in accordance with NJAC 7:26-9.4(d).	_____
9.3(a)3	Each container is not clearly dated with each period of accumulation (when accumulation starts) so as to be visible for inspection or clearly marked with words "Hazardous Waste"?	_____

9.4(d)1i	The hazardous waste is <u>not</u> stored in adequate containers of sturdy or leak proof construction.	_____
9.4(d)1ii	The lids, caps, hinges, or other closures are <u>not</u> of sufficient strength that when closed, they will withstand dropping, overturning, or other shock without impairment of the container's ability to contain hazardous waste.	_____
9.4(d)2	The containers do <u>not</u> appear to be in good condition, and are in danger of leaking. Describe the type, condition, and number of leaking containers in the narrative. Take pictures. Be specific.	_____
9.4(d)3	Containers are <u>not</u> compatible with the waste being stored in them.	_____
9.4(d)4i	containers are <u>not</u> kept securely closed when not in use so that there is no escape of hazardous waste or its vapors.	_____
9.4(d)4iii	Containers appear <u>not</u> to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking.	_____
9.4(d)4iv	Containerized hazardous wastes are <u>not</u> segregated in storage by waste type. (type interpreted as DOT compatibility)	_____
9. 4(d)4v	Containers are <u>not</u> arranged so that their identification labels or markings are visible.	_____
9.4(d)4vi	Cleaning of hazardous waste residues from empty containers does <u>not</u> take place in a designated area.	_____
94.(d)4vii	Rinse waters or cleaning agents resulting from the cleaning of containers or vehicles are <u>not</u> handled or disposed of in a manner consistent with N.J.A.C. 7:26-7.1 <u>et seq</u> & 9.1 <u>et seq</u>.	_____

9.4(d)4viii	The reuse of containers is <u>not</u> in compliance with DOT regulations (49 CFR 173.28).	_____
9.4(d)5	The container storage area is <u>not</u> inspected daily for leaks and deterioration. note: The generator is not required to document there inspections in a log. However, if any containers violations are noted, the Department assumes that the generator has not been conducting the required inspections.	_____
9.4(d)6	Containers holding ignitable and reactive wastes are <u>not</u> located at least 50 feet from the facility's property line.	_____
9.6(d)	The owner/operator <u>failed</u> to maintain access to communication or alarm system.	_____
9.6(e)	There is <u>inadequate</u> aisle space which <u>fails</u> to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment? (Policy is 18"single stack, 30" double stacked)	_____

SECTION 5.
WASTE OIL

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

*THE GENERATOR ONLY GENERATES X722 WASTE OIL IN ANY AMOUNT.

or*

The generator ONLY generates or store (in above ground tanks or drums) less than 1001 gal of only waste oil (except X725 for which 100kg. rule applies) per month.

7.7(d) The generator fails to obtain receipts (or manifests) from a New Jersey registered hazardous waste hauler and retain them for three years? (check quantities on receipts to ensure that the amount of oil involved is below the limit) _____

NOTE: No other Hazardous Waste regulations apply, * unless the storage of X listed waste oils exceeds 1001 gal: or unless the waste oil is also a Federal (RCRA) hazardous waste.*

The generator generates over 100 kg of hazardous waste (or 1 kg if acutely hazardous) and any listed waste oil or generates/stores *>1001* gal of waste oil in any given month and fails to be in compliance with:

Manifests requirements (7.4) _____

labeling and container requirements [9.4(d), 7.2(a)&(b), 9.3(a)3, 9.6(e)] _____

Satellite regulations. 9.3(d) _____

documentary requirements [9.4(g), 9.6, 9.7] _____

SECTION 6.

WASTE OIL TANKS:

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

If there is an above ground tank with total capacity (which includes drums) > 1001 gal but <90 day storage, does the generator FAIL to:

9.3(b) Have a letter of approval from Hazardous Waste Engineering. _____

9.3(b)2 Have controls on the tank to prevent overfilling. _____

9.3(b)3 Provide the tank with adequate secondary containment. _____

9.3(b)4 Insure that the tank can be emptied at least 99% every 90 days or less. Explain how this is determined in the narrative of this report.(ie., logs, manifests). _____

9.3(b)5 Empty the tank every 90 days or less. _____

9.3(b)6 Remove all wastes from the tank(s) and ship off-site to an authorized facility or place in an on-site, authorized facility. _____

9.3(b)8 If part of the tank is below grade, it is not constructed in a manner which allows visual inspection of the tank, comparable to a totally above-ground tank. _____

and,

secondary containment is not provided for the below grade part. _____

9.3(b)9 The tank is not labeled with the words "HAZARDOUS WASTE". _____

If there is above ground >1001 gal capacity, and >90 day storage and the generator:

12.1(a) Acts as a TSDF. _____
(use the TSD check list)

9.3(a)1 Acts as a generator. _____
(proceed with the generator check list)

If under ground tanks are used to store waste oil, the generator fails to:

A. *Use new commercial service station waste oil tanks of <1001 gal capacity* _____

B. Use underground tanks in existence and in use for Hazardous Waste storage prior to 1/17/83. _____

REFER TO THE UNDER GROUND TANK SECTION OF THE TSD CHECKLIST [9.2(b)].

SECTION 7.

ABOVE GROUND TANKS

DOES THE GENERATOR ACCUMULATE HAZARDOUS WASTE ON-SITE IN ABOVE GROUND TANKS FOR LESS THAN 90 DAY STORAGE? _____

IF YES:

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

If the generator stores hazardous waste in an <u>above ground</u> tank for <90 days, does the generator <u>fail</u> to:

9.3(b) Have a letter of approval from Hazardous Waste Engineering. _____

9.3(b)2 Have controls on the tank to prevent overfilling. _____

9.3(b)3 Provide the tank with adequate secondary containment. _____

9.3(b)4 Insure that the tank can be emptied at least 99% every 90 days or less. Explain how this is determined in the narrative of this report.(ie., logs, manifests). _____

9.3(b)5 to empty the tank every 90 days or less. _____

9.3(b)6 Remove all wastes from the tank(s) and ship off-site to an authorized facility or place in an on-site, authorized facility. _____

9.3(b)8 If part of the tank is below grade, it is <u>not</u> constructed in a manner which allows visual inspection of the tank, comparable to a totally above-ground tank. _____

and,

secondary containment is <u>not</u> provided for the below grade part. _____

9.3(b)9 The tank is <u>not</u> labeled with the words "HAZARDOUS WASTE". _____

SECTION 8.

WASTE MANAGEMENT

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

12.1(a) The is generator ACTING as a TSDF by:
(no Part A or B)

1. Treating hazardous waste. _____
2. Storing hazardous waste in underground tanks. _____
3. Placing hazardous wastes in piles [9.2(b)4] or surface impoundments? _____
4. Disposing of hazardous waste on site (ie., landfill, incineration, or injection well)? _____
5. Accumulating of hazardous waste for more than 90 days? _____

COMMENT ON CONDITIONS FOUND IN THE NARRATIVE SECTION OF THIS REPORT.

9.3(a)1 The site is acting as a generator but accumulating waste in containers or approved tanks for more than 90 days. _____

COMMENT ON CONDITIONS FOUND IN THE NARRATIVE SECTION OF THIS REPORT.

IF THE FACILITY IS ACTING AS A TSD, COMPLETE THE TSD REPORT.

SECTION 9.

GENERATOR MANIFESTS

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE AND LIST THOSE MANIFESTS THAT ARE DEFICIENT ON THE MANIFEST TRACKING PAGE. ATTACH A COPY OF EACH DEFICIENT MANIFEST. _____

7.4(a)3	The generator failed prepare a Hazardous Waste Manifest before transporting or offering for transport hazardous waste off-site.	_____
7.4(a)4	Each manifest failed to have the following information:	
7.4(a)4i	The generator's name (as reported to EPA), mailing address (& site address if different), and phone number.	_____
7.4(a)4ii	The generator's EPA ID number.	_____
7.4(a)4iii	The transporter(s) name (as reported to USEPA), phone number and NJ registration and decal numbers.	_____
7.4(a)4iv	The transporter(s) EPA ID number.	_____
7.4(a)4v	The name (as reported to EPA), address and phone number of the designated TSD facility.	_____
7.4(a)4vi	The TSD's EPA ID number.	_____

7.4(a)4vii	The proper USDOT description of waste: proper shipping name, RCRA hazard class,ID number, quantity and waste code of hazardous waste being shipped.	_____
	OR	
	Complete NOS information in item J including chemical names, constituents percentages, physical state, and EPA hazard code(s).	_____
7.4(a)4viii	Special handling instructions and any other information required on form to be shipped by generator including chemical names, 2 major constituent percentages, physical states, DOT description for NOS material hazardous characteristics [49 CFR 172.201(k)], or the manifest document number assigned by the generator.	_____
7.4(a)4ix	The waste reuse facility ID# in section G of the uniform manifest when shipping hazardous waste to a waste reuse facility.	_____
7.4(a)5i	The generator signature and date for the manifest certification.	_____
7.4(a)5ii	Transporter's signature & date acknowledging acceptance.	_____
7.4(a)5iii	The generator failed to retain one copy and forward one copy to the state of origin and one copy to the state of destination.	_____
7.4(a)5v	The generator failed to give the remaining copies of the manifest form to the hauler.	_____
7.4(e)2	The generator <u>failed</u> to utilized a transporter which is properly registered or has an EPA ID #.	_____
7.4(e)3	The generator <u>failed</u> to designate on the manifest an authorized TSD or reuse facility.	_____

7.4(e)4	The generator <u>failed</u> to ship the shipment of hazardous waste to an authorized TSD or reuse facility.	_____
7.4(f)	The generator <u>failed</u> to maintain the following facility records for three (3) years:	
7.4(f)1	Manifests.	_____
7.4(f)2	Annual or exception reports.	_____
7.4(f)3	The generator <u>failed</u> to maintain records during course of unresolved enforcement action or as requested.	_____
7.4(h)1	The generator has <u>failed</u> to receive signed copies (from the TSD facility) of all manifests for waste shipped off site more than 35 days from the date the waste was accepted by the initial transporter.	_____
7.4(h)1	The generator <u>failed</u> to contact the hauler and/or the owner or operator of the TSDF and the NJDEPE at (609) 292-8341 to inform the NJDEPE of the situation.	_____
7.4(h)2	The generator <u>failed</u> to file exception reports with the Department which covered any of these shipments made more than 45 days from the date the waste was accepted by the initial transporter.	_____

SECTION 10.

HAZARDOUS WASTES IMPORTS & EXPORTS

DOES THE FACILITY EXPORT HAZARDOUS WASTE? (yes/no, see manifests) _____

HAS THE FACILITY COMPLIED WITH THE FOLLOWING ITEMS IN THIS SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF THE GENERATOR EXPORTS WASTE, does he <u>fail</u> to:

1. Notify the EPA of its intent to export. _____
2. Provide detailed information on the following:
   - A. Waste Generators. _____
   - B. Transporters. _____
   - C. Foreign Facility. _____
   - D. Type of Waste. _____
3. Obtain acknowledgement of consent from the receiving country. _____
2. Insure that the acknowledgement is attached to each manifest. _____
3. Submit an annual report to the Administrator of the EPA by March of each year? _____
4. Deliver a copy of the Hazardous Waste Manifest to the U.S. Customs Service at the point of departure from the United states? _____

SECTION 11.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE AREAS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

9.7(a) The facility failed to have a written contingency plan for emergency procedures designed to deal with fires, explosion hazards to human health or environment, or any unplanned sudden or non sudden release of hazardous waste constituents into air, soil, or surface water. _____

9.7(b) The generator failed to carry out provisions of the plan immediately whenever there is a fire, explosion, or release of hazardous waste constituents which could threaten human health or the environment, _____

9.7(c) The contingency plan fails to describe the actions personnel shall take in response to fires, explosions, or any unplanned sudden or non sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. _____

9.7(d) The owner or operator <u>failed</u> to prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Counter-measure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq. _____

<u>NOTE:</u> DPCC: >400,000 gal storage of hazardous substances.

SPCC: Storage of any kind of oil and most oil products including gasoline and fuel oils If:

1. 600 gal single tank
2. 1,320 gal multiple tanks
3. 42,000 gal underground storage.

9.7(d) If the owner/operator has a DPCC or SPCC plan, he <u>failed</u> to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section. _____

9.7(e) The plan <u>fails</u> to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. _____

9.7(f) The plan <u>fails</u> to list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and the others shall be listed in the order in which they will assume the responsibility as alternates. _____

9.7(g)	The plan <u>fails</u> to include a list of all emergency equipment at the facility. Where this equipment is required, this list would include: fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment. The list must be up-to-date and include the location and physical description of each item on the list, and brief outline of its capabilities.	_____
9.7(h)	The plan <u>fails</u> to include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary.	_____
9.7(h)	The plan <u>fails</u> to describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes in cases where the primary route could be blocked by releases of hazardous waste or fires.	_____
9.7(i)	The generator <u>fails</u> to:	
	1. keep a copy of the contingency plan and all revisions to the plan at the facility.	_____
	2. Submit the contingency plan to local authorities (police, fire departments emergency response teams).	_____

9.7(j) The generator fails to revise the contingency plan when:

1. Applicable regulations are revised. _____

2. The plan fails in an emergency situation. _____

3. The facility changes so as to increase the potential for fire, explosions, or releases. _____

4. The Emergency coordinator Changes. _____

5. The emergency equipment changes. _____

9.7(k) The generator fails to have an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures. _____

9.2(a)2 The generator DOES NOT handle hazardous waste in a manner which causes (or may, or has caused) a discharge of a hazardous waste onto the land, waters or air of the State. _____

N.J.S.A. 58:10-23.11(c)

THERE IS A DISCHARGE OF A HAZARDOUS SUBSTANCE (UNDER SPILL ACT). _____

N.J.S.A. 58:10-23.11(e)

THE GENERATOR FAILED TO REPORT THE SPILL TO THE DEPARTMENT. _____

NOTE: IF THE ABOVE SPILL ACT VIOLATIONS ARE FOUND, REFER THEM TO THE DIVISION OF RESPONSIBLE PARTY SITE REMEDIATION FOR FURTHER ENFORCEMENT ACTION.

SECTION 12.

PERSONNEL TRAINING

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

9.4(g)2	The training program is <u>not</u> directed by a person trained in hazardous waste management procedures and, is it <u>not</u> designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems including 9.4(g)3i through 3vii.	_____
9.4(g)3	The training program <u>fails</u> to include the following emergency response procedures:	
9.4(g)3i	Use of personnel safety equipment.	_____
9.4(g)3ii	Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.	_____
9.4(g)3iii	Key parameters for automatic waste feed cut-off systems.	_____
9.4(g)3iv	Procedures for utilizing communications or alarm systems.	_____
9.4(g)3v	Directions for responding to fires or explosions.	_____

9.4(g)3vi	procedures for responding to ground water contamination incidents.	_____
9.4(g)3vii	Procedures for conducting shutdown operations.	_____
9.4(g)4	The facility personnel involved with hazardous waste management **have not** successfully completed a program of classroom instruction or on-the-job training within six months of the date of their employment or assignment to the facility or to a new position at the facility.	_____
9.4(g)5	Facility personnel **have not** taken part in an annual review of initial training	_____
	There is NO written documentation of the following:	
9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.	_____
94(9)6ii	A written job description for each position related to hazardous waste management.	_____
9.4(g)6iii	A written description of the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management.	_____
9.4(g)6iv	Documentation of actual training or experience received by personnel.	_____
9.4(g)7	Training records are NOT kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	_____

9.4(g)8	The semi-annual drills, involving all employees and appropriate local authorities, to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development are **not** conducted pursuant to N.J.A.C. 7:26-9.7.	_____
	IF IN VIOLATION,	
9.4(g)8i	The owner or operator failed to petition the Department for an exemption from the drill requirement.	_____
	OR	
9.4(g)8ii	Failed to petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements.	_____
	IN WHICH CASE	
	The owner/operator failed to provide those specific local officials with written approval of the exemption.	_____

SECTION 13.

PREPAREDNESS AND PREVENTION

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

The facility fails to have:

9.6(b)1	An internal communications or alarm system.	_____
9.6(b)2	A telephone or other device to summon emergency assistance from local authorities.	_____
9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment.	_____
9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.	_____
9.6(c)	The owner/operator has failed to test and maintain all of the above emergency equipment.	_____

9.6(f)	The facility has <u>failed</u> to make the following arrangements (documented), as appropriate for the type waste handled on site:	_____
	The generator <u>failed</u> to:	
9.6(f)1	Familiarize Police, fire departments, and emergency response teams with the layout of the facility,hazardous waste handled, and associated hazardous places where facility personnel would normally be working; entrances, roads inside facility, and possible evacuation routes.	_____
9.6(f)2	Have an agreement designating primary emergency authority to a specific police and fire department where more than one Police and fire department might respond to an emergency, and agreements with others to provide support to the primary emergency authority.	_____
9.6(f)3	Agreements with emergency response contractors, and equipment supplier.	_____

LIST THE EMERGENCY RESPONSE CONTRACTORS IN THE NARRATIVE SECTION OF THIS REPORT.

9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions, or discharges at the facility.	_____
9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually.	_____
9.6(f)6	If authorities identified in (f)1 through 5 above decline to enter into such arrangements, the owner/ operator has <u>failed</u> to documented this refusal in the operating record.	_____

SECTION 14.

WASTE WATER TREATMENT PLANT SLUDGE

IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THIS INSPECTION REPORT?

IF YES, DESCRIBE CONDITIONS FOUND AT THE FACILITY IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.
DESCRIBE THE ITEMS OF NON COMPLIANCE FOUND IN THE NARRATIVE SECTION OF THIS REPORT.
PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

1. "WASTE WATER TREATMENT UNIT" QUALIFICATION PER 7:14A-4.3

The drying unit is NOT part of a waste water treatment facility which is subject to regulation under Section 402 or Section 307(b) of the federal Clean Water Act. _____

Note: In order to be considered "part of" the facility, the dryer need not be physically connected to the W.W.T. facility, but must be located at the same site.

The drying unit treat does NOT a sludge which is generated on-site by the wastewater treatment facility. _____

The sludge is NOT to be treated as a regulated hazardous waste as defined at N.J.A.C. 7:26-8. _____

The drying unit does NOT meet the definition of a "tank" at N.J.A.C. 7:14A-4.3. _____

Note: "Tank" means a stationary device designed to contain an accumulation of hazardous waste and constructed of non-earthen materials which provide the structural strength to totally contain the waste. Dryers that are integrally equipped with feed or discharge hoppers for treatment of sludge in bulk satisfy the definition of "tank". Others not so designed may still be considered tanks on a case-by-case bases.

2. PRIMARY PURPOSE RESTRICTION

The primary purpose of the dryer is NOT to dehydrate sludge, BUT TO destroy sludge to produce an ash residue. _____

3. THERMAL INPUT LIMITATION:

The dryer's maximum total thermal input, excluding the heating value of the sludge itself, IS MORE than 2,500 BTU's per pound of sludge treated on a wet-weight bases. _____

Note: Total thermal input equals dryer heating capacity (converted to btu/min) multiplied by the maximum drying time divided by weight of sludge per batch.

use the space provided below to determine the total thermal input.

If the answer to any of the above questions is YES, the dryer is subject to Hazardous Waste Facility permit requirements and must be regulated as a Miscellaneous Unit pursuant to N.J.A.C. 7:26-10.9 et seq. _____

SUMMARY OF VIOLATI

en making a referral, list each ci and the basis
issuing the violation :

add additional pages as needed

CONFIDENTIAL - RECOMMENDATIONS

TO: FILE_____ **DATE**_____

FROM: _____

SUBJECT: _____

EPA. ID. #: _____ **INSPECTION DATE:**_____

NOTE: 1) Confidential material can be subpoenaed.
2) May be subject to public review (Right to Know).
3) Confidentiality is limited, it includes :
   1) Criminal activity (including suspected or potential)
   2) Potential non-compliance or potential violations
   3) Information obtained by informants (do not use names)
   4) Proprietary information regarding industrial processes (only if requested in writing).
   5) Attorney client relations (with DAG)
   6) Entire file is confidential while violations are under investigation.

add additional pages as needed

SECTION 10.

WASTE MINIMIZATION

DOES THE FACILITY HAVE A WASTE MINIMIZATION PLAN? _____

IF YES, IS THE FACILITY IN COMPLIANCE WITH THE REGULATIONS OF THE FOLLOWING SECTION OF THE INSPECTION REPORT? _____

IF YES, IDENTIFY AND REVIEW THE FACILITY'S WASTE MINIMIZATION PLAN.

DESCRIBE THE FACILITY'S PLAN IN THE NARRATIVE SECTION OF THIS REPORT. PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

IF NO, NOTE THIS IN THE NARRATIVE SECTION OF THIS REPORT. PROCEED TO THE NEXT SECTION OF THIS REPORT. _____

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: NATIONAL STARCH AND CHEMICAL Co.

U.S. EPA ID No.: NJD001519230

Street: 10 FINDERN AVE.

City: BRIDGEWATER State: NJ Zip: 08807

Telephone: 908 - 685 - 5024

Inspection Date: 7/24/92 Time: 0855 (am/pm)

Weather Conditions: CLOUDY & UNSEASONABLY COOL

	Name	Agency/Title	Telephone
Inspectors:	ROBIN JONES	NJDEPE	201-299-7592

Facility Representatives: BOB STRAIN - Mgr. HEALTH & SAFETY 908 685 5024
ROGER GARY - COMPLIANCE SUPERVISOR

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	X				
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]	X				
Second Third [40 CFR 268.11]	X				
Third Third [40 CFR 268.12]	X				

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

See RCRA REPORT

LDR Waste Management:

Summary:

Signature:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

SEE PRINT OUT

1. F001 through F005 spent solvents: _____

2. F020-F023 and F026-F028 dioxin-containing wastes: _____

3. California List Wastes (See Appendix A): _____

4. First Third Wastes [40 CFR 268.10]: _____

5. Second Third Wastes [40 CFR 268.11]: _____

6. Third Third Wastes [40 CFR 268.12]**: _____

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ✓ No___

If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

FIRST-THIRD	SECOND-THIRD	THIRD-THIRD	F001--005
P005	P003	D001	F001
P069	U008	D002	F002
P105	U038	D003	F003
U007	U060	D005	F004
U009	U098	D006	F005
U041	U107	D007	
U061	U147	D008	
U077	U162	P022	
U078	U169	P028	
U129	U213	U001	
U188		U069	
U210		U096	
U211		U113	
U223		U117	
U226		UII8	
		U024	
		U055	
		UI60	
		U152	
		U202	
		U225	

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ✓ No ___ NA ___

Comments ___

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments ___

C. **Does the facility handle the following wastes (national capacity variances)?**

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List ___

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List ___

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List ___

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List ___

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List ___

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ✓ No ___ List P087

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ✓ No ___ List D009

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes ✓ No ___ NA ___

   If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

   Yes ___ No ___ NA ✓

   If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

      Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
See ATTACHED			

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes __ No ✓ NA __

c. Does the generator specify alternative treatment standards for lab packs?*

Yes __ No ✓ NA __

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

__ Organometallics: 40 Part 268, Appendix IV constituents
__ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes __ No __ NA ✓

If yes, check the appropriate treatability group:

__ 50 to 500 ppm PCBs
__ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	_____	__/__/__
___	_____	__/__/__
___	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ✓ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	_____	_____	_____
___	_____	_____	_____
___	_____	_____	_____

Comments_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]
ALL WASTE ARE NOT ALTERED FROM PRODUCT ORIGIN

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No ✓ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ✓ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ✓ NA ___

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ✓ NA ___

C. Management

1. On-Site Management:

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ✓

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility

See ATTACHED

See PRINTOUT THOSE CIRCLED DID NOT HAVE NOTIFICATION

* Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

*b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

See MANIFEST ACTIVITIES SHEET ATTACHED

Yes ___ No ✓

Are copies of relevant tolling argreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No ✓ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ___ No ___ NA ___

   (If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

_____

Subcategory Checklist

I. Characteristic Wastes.

A) Does facility handle D001 waste ?
Yes X No____
If yes, which subcategory(ies) ?

Ignitable compressed gas	Yes X	No____
Ignitable liquids High TOC ≥ 10%	Yes____	No X
Ignitable liquids Low TOC < 10%	Yes____	No X
Ignitable reactives	Yes____	No X
Oxidizers [wastewater or non-wastewater]	Yes____	No X
Ignitible liquids [wastewater or non-wastewater]	Yes X	No____

B) Does facility handle D002 waste ?
Yes X No____
If yes, which subcategory(ies) ?

Acids, pH ≤ 2 [wastewater or non-wastewater]	Yes X	No____
Alkaline, pH ≥ 12.5 [wastewater or non-wastewater]	Yes X	No____
Radioactive high level wastes	Yes____	No X

C) Does facility handle D003 waste ?
Yes X No____
If yes, which subcategory(ies) ?

Explosives [wastewater or non-wastewater]	Yes____	No X
Reactive cyanides:		
•wastewater - cyanides ≥ 0.86 ppm	Yes____	No X
•non-wastewater - total cyanides ≥ 590 ppm and amenable cyanides ≥ 30 ppm	Yes____	No X
Reactive sulfides [wastewater or non-wastewater]	Yes____	No X
Reactive [wastewater or non-wastewater]	Yes X	No____

D) Does facility handle D004 waste ?
Yes____ No X
If yes, is it this subcategory ?

Radioactive high level wastes	Yes____	No____

E) Does facility handle D005 waste ?
Yes X No____
If yes, is it this subcategory ?

Radioactive high level wastes	Yes____	No X

F) Does facility handle D006 waste ?
Yes X No_____
If yes, which subcategory(ies) ?

Cadmium batteries	Yes_____	No X
Radioactive high level wastes	Yes_____	No X

G) Does facility handle D007 waste ?
Yes X No_____
If yes, is it this subcategory ?

Radioactive high level wastes	Yes_____	No X

H) Does facility handle D008 waste ?
Yes X No_____
If yes, which subcategory(ies) ?

Lead acid batteries	Yes_____	No X
Radioactive lead solids	Yes_____	No X
Radioactive high level wastes	Yes_____	No X

I) Does facility handle D009 waste ?
Yes X No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm [organics or non-organics]	Yes X	No_____
Low mercury < 260 ppm	Yes X	No_____
Elemental mercury with radioactive materials	Yes_____	No X
Hydraulic oil with mercury and radioactive materials	Yes_____	No X
Radioactive high level wastes	Yes_____	No X

J) Does facility handle D010 waste ?
Yes_____ No X
If yes, is it this subcategory ?

Radioactive high level wastes ?	Yes_____	No_____

II. Listed wastes

A) Does facility handle F001-F005 waste ?
Yes X No_____
If yes, which subcategory(ies) ?

Non-pharmaceutical	Yes X	No_____
Pharmaceutical [methylene chloride ≥ 0.44 mg/l]	Yes_____	No X

B) Does facility handle F025 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

Filters, filter aids, and/or desiccants [wastewater or non-wastewater] Yes_____ No_____
Light ends Yes_____ No_____

C) Does facility handle K061 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High zinc ≥ 15% Yes_____ No_____
Low zinc < 15% Yes_____ No_____

D) Does facility handle K069 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

Calcium sulfate Yes_____ No_____
Non-calcium sulfate Yes_____ No_____

E) Does facility handle K106 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

F) Does facility handle P065 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

G) Does facility handle P092 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

H) Does facility handle U151 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____
Radioactive elemental mercury Yes_____ No_____

California List Applicability

I. California List Waste Determination.

A) Using either knowledge of the waste or determination by the paint filter liquids test (PFLT), has the generator determined whether its waste is a liquid ?

Yes X No

B) Current Applicability.

1) Do liquid hazardous wastes contain over 50 ppm PCBs ?

Yes_____ No X

2) Do hazardous wastes contain Halogenated Organic Compounds (HOCs) where it is identified as hazardous by a characteristic property that does not involve HOCs ?

Yes_____ No X

3) Do liquid hazardous wastes contain a total concentration of more than 134 mg/l of nickel and/or 130 mg/l of thallium ?

Yes_____ No X

See LDR Checklist pg. 8 if yes is answered to any of the above questions, the waste is currently subject to California List Prohibitions.

C) Historical Violations.

California List Prohibitions became effective on July 8, 1987 for wastes falling under any of the following descriptions:

1) Does the liquid hazardous waste, including free liquids associated with solid or sludge, contain free cyanide at concentrations $\geq$ 1000 mg/l ?

Yes_____ No X

2) Does liquid hazardous waste, including free liquids associated with any solid or sludge, contain the following metals (or elements) or compounds of these metals (or elements) at concentrations greater than or equal to these prohibition levels ?

Yes X No_____

Arsenic	500 mg/l	Yes_____	No X
Cadmium	100 mg/l	Yes X	No_____
Chromium VI	500 mg/l	Yes X	No_____
Lead	500 mg/l	Yes X	No_____
Mercury	20 mg/l	Yes X	No_____
Nickel	134 mg/l	Yes_____	No X
Selenium	100 mg/l	Yes_____	No X
Thallium	130 mg/l	Yes_____	No X

3) Does the liquid (aqueous) hazardous waste have a pH ≤ 2 ?

Yes X No ____

4) Do HOC wastewaters, defined as HOC-waste mixtures that are primarily water, contain ≥ 1000 mg/l but < 10,000 mg/l ?

Yes ____ No X

5) Do other liquid hazardous wastes contain HOCs in total concentrations ≥ 1000 mg/l ?

Yes ____ No X

6) Do non-liquid hazardous wastes contain HOCs in total concentrations > 1000 mg/kg ?

Yes ____ No X

7) Do liquid hazardous wastes contain polychlorinated biphenyls (PCBs) at concentrations ≥ 50 ppm but < 500 ppm ?

Yes ____ No X

8) Does the liquid hazardous waste contain PCBs ≥ 500 ppm ?

Yes ____ No X

TOXICITY CHARACTERISTIC ("TC") INSPECTION CHECKLIST

1. Has the handler tested all its solid waste streams using the TCLP?

   Yes_____ No X

   a) If no, are there any waste streams which should be tested.

   Explain NO. ~~ALL~~ NO WASTES HAVE ~~MET~~ BEEN ~~FOUND~~ SIGNIFICANTLY ALTERED TO WARRANT TESTING.

   b) If the handler is a TSD, has the owner/operator revised its waste analysis plan to incorporate the new TCLP requirements?

   N/A

   Yes_____ No_____

2. Does the handler generate waste exceeding the regulatory level for any constituent listed in Table I-TC?

   Yes X No_____

   If no this checklist need not be completed.

3. Was the handlers waste(s) considered a federal hazardous waste prior to the promulgation of the new TCLP requirement?

   Yes X No_____

   If No, proceed to question number 4. If yes, answer questions 3a), 3b) and 3c) and then stop.

   a) Have both the listed and characteristic waste code been assigned, were a listed waste exhibits a characteristic for which the waste is not listed?

   Yes X No_____

   Comments _____

   b) Does the handler determine and list on its manifests all of it's waste(s) TCLP characteristics?

   Yes X No_____

   Comments _____

c) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request indicating the new hazardous constituent(s) found in their waste(s)?

N/A

Yes_____ No_____

4. Is the waste managed as a hazardous waste?

Yes X No_____

If No, this is a high priority violation. Be sure to obtain a detailed description of the wastes final disposition.

Comments _____

a) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request for the previously unregulated waste or hazardous waste unit which has become subject to hazardous waste regulation as a result of the new TC Rule?

N/A

Yes_____ No_____

NOTE: The inspector should bear in mind that any waste stream, unit or handler newly regulated on account of the change in the analytical procedures associated with the Toxicity Characteristic may now be subject to all the applicable requirements of N.J.A.C. 7:26-1, 7 - 12 and 40 C.F.R. Parts 260 - 270. All applicable current checklists should be used to determine compliance status.

EFFECTIVE DATES FOR COMPLIANCE WITH TC REQUIREMENTS

Generators of ≥1,000 kg/mo. of hazardous waste	9/25/90
Generators of <1,000 kg/mo. of hazardous waste	3/29/91

ADDITIONAL COMMENTS: _____

LIST OF NEW JERSEY C-CODE WASTE WHICH POTENTIALLY EXHIBIT THE NEW TOXICITY CHARACTERISTIC

ORGANICS

C133	Benzene	C292	Hexachloroethane
C162	Chlordane	C319	Methyl Ethyl Ketone
C170	Chlorobenzene	C340	Nitrobenzene
C176	Chloroform	C375	Pentachlorophenol
C468	Cresol	C396	Pyridine
C216	1,2-Dichloroethane	C415	Tetrachloroethylene
C219	1,1-Dichloroethylene	C442	Trichloroethylene
C260	2,4-Dinitrotoluene	C444	2,4,5-Trichlorophenol
C286	Heptachlor	C445	2,4,6-Trichlorophenol
C288	Hexachlorobenzene	C459	Vinyl Chloride

note: Some X700 series waste which formerly were not regulated under the federal program may now be subject to RCRA as a characteristic hazardous waste (i.e. D018 - Benzene.)

METALS AND PESTICIDES

Arsenic: C123, C124, C125, C126.

Barium: C129, C130.

Cadmium: C157.

Chromium: C184.

Lead: C306, C307, C308, C309.

Mercury: C313, C479, C380.

Selenium: C400, C401, C402.

Silver: C404, C405.

Endrin: C270.

Toxaphene: C437.

2,4-D: C223.

Silvex: C447.

note: Since the Toxicity Characteristic Leaching Procedure ("TCLP") is a more stringent analytical method than the Extraction Procedure ("EP"), wastes which contain toxic metals and pesticides which were not subject to RCRA regulation as hazardous waste when tested via the EP (i.e. the above listed C-code wastes) could now be a hazardous waste under the TCLP.

TABLE I-TC

TC Constituents and Their Regulatory Levels

Newly Added Constituents

Constituent	Regulatory Level (mg/l)	Constituent	Regulatory Level (mg/l)
D018 Benzene*	0.5	D032 Hexachlorobenzene	0.13
D019 Carbon Tetrachloride*	0.5	D033 Hexachloro-1, 3-Butadiene	0.5
D020 Chlordane	0.03	D034 Hexachloroethane	3.0
D021 Chlorobenzene	100.0	D035 Methyl Ethyl Ketone	200.0
D022 Chloroform	6.0	D036 Nitrobenzene	2.0
D023 O-Cresol	200.0	D037 Pentachlorophenol	100.0**
D024 M-Cresol	200.0	D038 Pyridine	5.0
D025 P-Cresol	200.0	D039 Tetrachloroethylene	0.7
D027 1, 4-Dichlorobenzene*	7.5	D040 Trichloroethylene*	0.5
D028 1, 2-Dichloroethane*	0.5	D041 2, 4, 5-Trichlorophenol	400.0
D029 1, 1-Dichloroethylene*	0.7	D042 2, 4, 6-Trichlorophenol	2.0
D030 2, 4-Dinitrotoluene	0.13	D043 Vinyl Chloride*	0.2
D031 Heptachlor	0.008	D026 Cresol	200.0

EP Constituents (Being Retained at Current Levels)

Constituent	Regulatory Level (mg/l)	Constituent	Regulatory Level (mg/l)
D004 Arsenic*	5.0	D011 Silver*	5.0
D005 Barium*	100.0	D012 Endrin*	0.02
D006 Cadmium*	1.0	D013 Lindane*	0.4
D007 Chromium*	5.0	D014 Methoxychlor*	10.0
D008 Lead*	5.0	D015 Toxaphene*	0.5
D009 Mercury*	0.2	D016 2, 4-D*	10.0
D010 Selenium*	1.0	D017 2, 4, 5-TP (Silvex)*	1.0

* Regulated based on an MCL.

**The Agency will propose a new (lower) regulatory level for this constituent, based on the latest toxicity information.

Waste Minimization Checklist

GENERATOR CHECKLIST

MANIFEST

GENERAL 262.20	YES	NO	N/A
Does the generator, offer for tranportation, hazardous waste for off-site treatment/disposal? If yes. proceed to next question. If no, proceed to 264.75/265.75.	X	—	—
262.23			
Does the generator sign the manifest certification which states;	X	—	—

" If I am a large quantity generator, I have a program in place to reduce the volume and toxicity of the waste generated to the degree I have determined to be economically practical and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the enviroment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."

Does the generator have a written Waste Minimization Plan?	X	—	—
If no, is the generator able to describe his plan orally.	—	—	X

COMMENTS:
(Explain in this space the areas that visually show evidence that a program is in place and is being implemented)

ANNUAL/BIENNIAL REPORT

262.41	YES	NO	N/A
Has the generator submitted Annual (AR) or Biennial reports (BER) to the appropiate regulatory agency?	X	—	—

The inspector should review these reports prior to the inspection (see above), and should try to verify the information in the report during his/her site inspection. The following questions should be addressed during the inspection.

262.56(a)(5)			
Does the BER or AR include the efforts undertaken during the year to reduce the volume of toxicity of the wastes generated?	X	—	—
Does the BER or AR include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?	X	—	—
Do these efforts match the information contained in the generator's written or verbally described waste minimization program.	X	—	—
Is the BER or AR certification signed by the generator or authorized representatives?	X	—	—

TSDF CHECKLIST

The inspector should review a copy of the AR/BER prior to the inspection, and should try to verify the information in the report during his inspection. The following question should be addressed during the inspection.

	YES	NO	N/A
Does the AR/BER include the efforts undertaken during the year to reduce the volume of toxicity of the waste generated?	X		
Does the AR/BER include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?	X		
Doe these efforts match the information contained in the generator's written or verbally described waste minimization program.			
Is the AR/BER certification signed by the generator or authorized representatives?	X		
264.75/265/75 (h-j) Does the generator treat, store and dispose hazardous waste on site?		X	
If yes to the above question, does the generator submit BERs or ARs to the appropiate regulatory agency?			X