Site ID RID001194323

Part A Application Yes ✓ No ____

RCRA INSPECTION CHECKLIST

Site Name: Ciba Geigy

Site Location: 180 Mill St.
Cranston RI

RCRA Contact: James Crowley

Phone No: (401) 467-8200

Inspectors:

EPA: Michele Travers, Grace Crooker

State: Tom Dolce

Induatry: Jim Crowley, Ed Beach
John Rotter, Serge Lopowkhine

Inspection Date: 2/11/81 10:55 Am

Type of Facility: ~~Gen.~~, ~~Tran.~~

Generator: ✓

Transporter: ✓

TSD: ✓

Permits Issued: NPDES

In Compliance: Yes ____ No ✓

I. Generator with Temp. Storage of TSD Facility

A. Pre-Inspection Meeting

1. General Information (Process Description, etc.)

Batch manu. of pharmaceuticals & organic chemicals.

SEMS DocID 667454

2. Hazardous Waste Profile

Type of Waste	Amt. of Waste kg/mo	Temp.	Onsite Storage/ TSD	Transporter	Offsite TSD
Spent Solvents	≈20,000 gal/month		Storage Tank		2 times/month Rollins NJ or McKintosh, Ala
Contaminated H_2SO_4	≈8000 gal		"		SCA every 10 days
Waste solids from process samples & distillation residues)	≈110 (55) gal drums/month		320 drums stored on site		Secos or McKintosh every 3 wks.
Contaminated H_2SO_4	≈50,000 gal				reclaimed by Chemical Co. that supplies acid to Ciba Geigy

3. Records

262.21 a.) Manifest

1) Document No.: ✓
2) Generator ID, name, address: ✓
3) Transporter(s) ID, name, address: ✓
4) TSD Facility ID, name address: ✓
5) Waste Type & Quantity: ✓
6 Date of Acceptance:

262.50 i) International Shipping Manifest:
262.42 ii) Exceptions Reports:

264.13 *b) Waste Analysis Plan:

1. Sampling and test methods: ✓
2. Results: ✓

OK ~~Get copy of waste analysis~~

*Not required for temporary storage.

264.15 c) Inspection Schedule and Log of Site

264.15 1. Daily - loading and unloading of areas subject to spills: _____
265.194 - discharge control equipment in tanks: _____
265.34, 265.377 - incinerator system, thermal treatment equipment, chem/phys/biol.
265.403 treatment equipment: _____
265.226 - freeboard level of surface impoundments: _____

OK

265.174 2. Weekly - physical conditions of containers:
265.194 - " tanks: _____
265.226 - " surface impoundments: _____
265.403 - " chem/phys/bio. treatment facility: _____

264.16 d) Personnel Training Records

1.) Job titles/position descriptions: Will send within 1 wk.
2.) Description of training: _____
3.) Records of training: _____

e) Contingency Plan

1.) Plan on site: ✓
2.) Local authority arrangements: ✓
3.) Identify emergency coordinator: ✓
4.) List of emergency equipment: ✓
5.) Evacuation Plans: ✓

B. Inspection

264.14 1. Site Security

a) 24 hour surveillance system ✓
b) or Artificial or natural barrier _____
c) and Means to control entry ✓
d) Danger sign posted at each entrance legible at 25' NO

264.30 - .37

2. Site Preparedness/Prevention

a) Internal communication/alarm ✓
b) Telephone/2-way radio —
c) Portable fire control equipment ✓
d) Adequate water for fire control ✓
e) Testing and Maintenance of equipment ✓
f) Adequate aisle spare ✓
g) Access to equipment ✓

265.170-177 3. Containers

Leaks yes
Ruptures
Corrosion
Closed except in use No
Heat/Pressure
50' bufferzone for I and R wastes
No smoking signs near I or R waste
Separation of incompatible wastes
Evidence of spills

262.30-34 Pre-transport requirements: packaging
labelling
marking
placarding

265.190-199 4. Tanks

Leaks OK
Ruptures OK
Corrosion
≥ 2' freeboard or secondary containment yes - dike
Heat/pressure
Evidence of spills
Inflow controls
Special Requirements for I and R wastes

265.220-.230 5. Surface Impoundments

Protective Cover on Dikes None
≥ 2' freeboard
Special requirements for I and R waste

265.250-.257 6. Waste Piles

Wind erosion control None
Prevention of leachate from pile
Special requirements for I and R wastes
Separation of incompatible wastes

265.340
265.382 7. Incinerators/Thermal Treatment

a) Steady State conditions None
b) Inspect combustion and emission control instruments every 15 min.
c) Observe stack plume hourly
d) Waste Analysis:
   1) Heating value of waste
   2) Organic halogen content

Incinerators/Thermal Treatment Cont.

3) Sulfur content _____
4) Lead concentrations _____
5) Mercury concentrations _____

e) Evidence of leaks of spills _____
f) Opening burning of explosives or others _____

265.400-.406 8. Phys/Chem/Bio. Treatment

a) Leaks None
b) Ruptures _____
c) Corrosion _____
d) Waste cut Off _____
e) Waste Analysis _____
f) Special Requirements for I and R wastes _____
g) Special Requirements for incompatible waste _____

PENALTY COMPUTATION WORKSHEET

Company Name: Ciba Geigy

Regulation Violated:

Part I - Seriousness of Violation Penalty

	265.14(c)	265.171	265.173	265.16(d)(1)+(2)
1. Regulation Class:	1 (last of 3 c-k)	1 (only a few bcs. while leaking)	1 (Only few w/ cans off)	2 (dam - viol. of reg.)
2. Conduct Category:	minor	minor	minor	minor
3. Damage Category:	(General Security = GOOD) Minor	Don't know contents. ∴ don't know potential harm. moder.	moder.	moder.
4. Matrix Cell Range:	500 - 2500	5000 - 6500 → "		3000 - 3800
Midpoint:	1500	5750 → "		3400
Adjustment From Midpoint:				
Single-Day Assessment:				
5. Number of Days of Violation:				3400 5750 5750 1500
6. Total Penalty Assigned for Seriousness (# of days times single-day assessment):				16,400

Part II - Penalty Adjustments

	Percentage Change*	Dollar Amount
1. Extraordinary Efforts To Comply		
2. Voluntary Efforts To Rectify Damage		
3. Lack of Control		
4. History of Violation		
5. Intent		
6. Government Costs		
7. Economic Benefits		
8. Penalty From Part I		
9. Total (Part I and Part II)		
10. Ability to Pay Adjustment (Up to 100% of total penalty)		

Part III - Multiple Violations**

Assessments for Separate Violations: _____ _____

Total Penalty Amount _____

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*Percentage adjustments are applied to the dollar amount calculated on Line 6, Part I.

**Assessments for multiple violations should be determined on a separate worksheet and totalled here. Care should be taken to avoid double-counting of adjustment factors.